BEFORE THE POWER SITING BOARD OF THE STATE OF OHIO

In the Matter of the Letter of Notification Application by	**)**	
American Electric Power Ohio Transmission Company	**)**	**Case Number**
for a Certificate of Environmental Compatibility and	**)**	**14-1075-EL-BLN**
Public Need for the Ross-Delano 138 kV Transmission	**)**	
Line Rebuild Project in Ross County, Ohio.	**)**	

Members of the Board:

Chairman, Public Utilities Commission	Ohio House of Representatives
Director, Development Services Agency	Ohio Senate
Director, Department of Health	
Director, Department of Agriculture	
Director, Environmental Protection Agency	
Director, Department of Natural Resources	
Public Member	

To the Honorable Power Siting Board:

Please review the attached Staff Report of Investigation, which has been filed in accordance with the Board's rules. The applicant's accelerated certificate application in this case is subject to an automatic approval process as required by Section 4906.03 of the Ohio Revised Code.

The application will be automatically approved on **July 17, 2014**, unless suspended by the Board's chairperson, the executive director, or an administrative law judge. If suspended, the Board must render a decision on the application within 90 days.

The Staff Report includes recommended conditions of the certificate. Prior to the automatic approval date, the applicant must file a supplement to its application that adopts these conditions. Absent such supplement, Staff will recommend that the case be suspended.

Any concerns you or your representative may have with this case must be presented to the Executive Director of the Power Siting Board at least four business days prior to **July 17, 2014**, which is the automatic approval date. To contact the Executive Director with concerns, you can reply to the email to which this document was attached, or use the ContactOPSB email address listed below.

Sincerely,

Patrick Donlon
Interim Executive Director
Ohio Power Siting Board
(614) 466-6692
ContactOPSB@puc.state.oh.us

OPSB STAFF REPORT OF INVESTIGATION

Case Number:	14-1075-EL-BLN
Project Name:	Ross-Delano 138 kV Transmission Line Rebuild Project
Project Location:	Ross County
Applicant:	American Electric Power Ohio Transmission Company
Application Filing Date:	June 18, 2014
Filing Type:	**Expedited** Letter of Notification
Inspection Dates:	July 2, 2014
Report Date:	July 9, 2014
Automatic Approval Date:	July 17, 2014
Applicant's Waiver Requests:	None
Staff Assigned:	J. Pawley, D. Rostofer, J. Cross, S. Irwin

Summary of Staff Recommendations (see discussion below):

Application: ☐ Approval ☐ Disapproval ☒ Approval with Conditions

Waiver: ☐ Approval ☐ Disapproval ☒ Not Applicable

Project Description

This project will consist of rebuilding the existing 138 kilovolt (kV) single circuit Ross-Delano transmission line to a 138 kV double circuit transmission line, primarily within existing right-of-way. The Applicant will need to obtain a small portion of new right-of-way to allow for a relocation of approximately 350 feet to the west of the existing centerline for approximately 0.4 miles at the southern end of the project. The project will replace existing wood H-frame structures with steel monopole structures. The project is approximately 4.8 miles total in length. Construction is anticipated to begin in July 2014 with engineering and design and access road planning. The anticipated in-service date is June 2017. The cost of the project is estimated at approximately $3.3 million.

Site Description

Land use along the existing right-of-way and adjacent to the project area is primarily commercial and light industrial, agricultural, wooded parcels, and residential. Since the project is within an existing electrical transmission line corridor, and the characteristics of the project are not significantly different from the existing transmission line, the project would not significantly impact surrounding land uses. The existing right-of-way has been maintained over the years. Some vegetative clearing/trimming will be required. The project crosses U.S. Routes 23 and 35, as well as the Scioto River and a City of Chillicothe pedestrian/bikeway trail.

Need

Facility Need

The proposed project is a baseline reliability upgrade approved by the PJM Interconnection (PJM) Board of Directors as a part of the Regional Transmission Expansion Plan (RTEP) to meet system reliability requirements, due to generation retirements in Ohio. A PJM baseline reliability upgrade resolves a system reliability criteria violation, which was found by AEP, North American Electric Reliability Corporation, or PJM planning criteria.

The proposed project will address several planning criteria violations and improve reliability of the system:

- N-1-1emergency loading can not exceed 100 percent: Delano-Scioto Trail and Scioto Trail-Scippo 138 kV lines load above 100 percent of the emergency capability;
- Voltages can not fall below 92 percent for N-1-1emergency loading: Voltages fall below 92 percent on several stations; and,
- Voltage drops of 8 percent are unacceptable: Voltage drops exceed 8 percent at several stations.

Long Term Forecast Report

The Ohio Administrative Code requires electric utilities and transmission owners to annually file a forecast report with the Public Utilities Commission of Ohio (PUCO). The report requires a 10-year plan of committed or tentatively projected projects on the bulk power transmission network. The proposed transmission line project was identified in the 2014 *AEP Ohio Transmission Company's Long-Term Forecast Report to the Public Utilities Commission of Ohio.* The PUCO assigned this document case number 14-1501-EL-FOR.[1]

PJM Regional Transmission Expansion Plan

PJM is the Regional Transmission Organization charged with planning for upgrades to the regional transmission system in Ohio. PJM annually issues the RTEP report. The RTEP analyzes reliability criteria, operational performance of the transmission system, and economic and environmental factors. The RTEP provides for the construction of expansions and upgrades of the PJM transmission system, as needed to maintain compliance with reliability criteria and, when appropriate, to enhance the economic and operational efficiency of wholesale electricity markets in the PJM Region.

The proposed project was identified as a baseline upgrade in the 2013 PJM RTEP[2] and approved by the PJM Board of Directors. The Applicant's project was assigned upgrade ID b2256. Status of the project can be tracked on PJM's website.[3]

[1] AEP Ohio Transco 2014 LTFR. http://dis.puc.state.oh.us/CaseRecord.aspx?CaseNo=14-1501-EL-FOR
[2] 2013 PJM RTEP Regional Transmission Expansion Plan. February 2014. p.246. Retrieved June 23, 2014, from http://pjm.com/planning.aspx
[3] PJM Transmission Construction Status. http://pjm.com/planning/rtep-upgrades-status/construct-status.aspx

Nature of Impacts

Social

The Applicant has proposed to rebuild the transmission line predominately within existing right-of-way. Therefore, potential impacts are expected to be largely confined to access for structure replacement and line stringing and should be temporary in nature. The proposed segment of new right-of-way is located in an agricultural field and grassland, and crosses over a City of Chillicothe pedestrian/bikeway trail on top of the city's floodwall protection levy for the Scioto River. The Applicant will need to coordinate a variety of factors with all impacted property owners to ensure minimal impacts along the new right-of-way, including tree clearing restrictions, temporary closure of the path, and structure location away from the floodwall protection levy.

Aesthetic impacts are expected to be similar to those present. Wood H-Frame structures currently support the Ross-Delano 138 kV transmission line between the respective substations. These structures would be replaced by double circuit steel monopole structures, placed in approximately the same locations, with the exception of the portion of new right-of-way at the southern end of the project (approximately 350 feet west of the existing transmission line, for a length of approximately 0.4 miles). This portion of the existing transmission line would be relocated due to plans to expand the Ross Substation to the west.

The Applicant has recently conducted a Phase I archaeological survey for this project. The results of this survey will be forwarded to Staff as soon as possible, with a recommendation of whether there are any sites affected by this project, and if they are eligible for inclusion in the National Register of Historic Places, as well as whether additional archaeological survey work is recommended.

Surface Waters

The electric transmission line right-of-way crosses the Scioto River, Dry Run, and five unnamed tributary stream segment, totaling 1,308 linear feet. According to the Federal Emergency Management Agency (FEMA) National Flood Hazard Layer (NFHL), the southern portion of the project is located within a 100-year flood zone. Approximately three poles are expected to be placed within the 100-year flood zone. The remaining portions of the project are located within Flood Zone X, an area with minimal flood hazard. No changes in flood elevations are anticipated as a result of the project.

Ten wetlands were identified within the study corridor. This project would cross five Category 1 and 2 wetlands, totaling 1,057 linear feet. Stream impacts would be avoided by accessing pole locations from either side of the streams, where practicable. Timber matting will be utilized for temporarily crossing some streams and wetlands for access to pole locations and to reduce and/or eliminate permanent impacts to these water resources. Wetlands would be clearly staked prior to the commencement of any clearing in order to minimize incidental vehicle impacts.

No ponds are located within the project right-of-way and no national forests or parks designated or proposed wilderness areas, national wild and scenic rivers, wildlife areas, wildlife refuges, wildlife management areas, or wildlife sanctuaries were identified within 1,000 feet of the proposed project.

The Applicant has provided a construction access plan, which will be incorporated into a final Stormwater Pollution Prevention Plan (SWPPP). Based on review of the construction access plan, Staff has determined that the Applicant considered the locations of streams, wetlands, wooded areas, and sensitive plant species, as identified by the Ohio Department of Natural Resources (ODNR), and has illustrated appropriately how impacts to all sensitive resources would be avoided or minimized during construction in this plan. The SWPPP will be provided to the Ohio Power Siting Board (OPSB) under separate cover, after submission of this Letter of Notification.

The Applicant will utilize best management practices (BMPs), as outlined in the SWPPP, to minimize impacts to surface waters. A Notice of Intent will be filed with the Ohio Environmental Protection Agency for authorization of construction stormwater discharges under General Permit OHC000003. Coverage under a U.S. Army Corps of Engineers Section 10 permit for crossing a navigable waterway (Scioto River) is also required.

Threatened and Endangered Species
Preferred summer roosting habitat for the federal and state endangered Indiana bat (*Myotis sodalis*) is located in the project area. The Applicant has committed to seasonal cutting dates of October 1 to March 31 for the clearing of trees that exhibit suitable Indiana bat summer habitat. Additionally, the project is within the range of the Uhler's sundragon (*Helocordulia uhleri*), a state endangered dragonfly. ODNR stated that wetland impacts must be avoided in order to avoid potential impacts to this species. After receiving the ODNR Biodiversity Database response, the Applicant sent a second letter to ODNR soliciting specific comments regarding the project on May 13, 2014. As of June 17, 2014, no response has been received. Staff would recommend that the Applicant be required to coordinate further with ODNR concerning the Uhler's sundragon to determine if the temporary impacts to wetlands would impact this species, prior to the commencement of construction.

Conclusion

The Applicant's utilization of existing right-of-way and temporary access for the majority of the length of the project significantly minimizes potential adverse impacts. With the following conditions, the construction of this project should pose only minimal negative social and ecological impacts. Staff recommends automatic approval of this case on July 17, 2014.

Staff Recommended Conditions:

1. Prior to construction, the Applicant shall obtain all applicable permits and authorizations as required by federal and state entities for any activities where such permit or authorization is required;

2. The Applicant shall institute a public information program that informs affected property owners of the nature of the project, specific contact information for Applicant personnel who are familiar with the project, the proposed timeframe for project construction, and a schedule for restoration activities. Notification to property owners shall be given at least seven days prior to work on the affected property;

3. The Applicant shall adhere to seasonal cutting dates of October 1 and March 31 for removal of suitable Indiana bat habitat trees, if avoidance measures cannot be achieved;

4. The Applicant shall not conduct mechanized clearing of trees within 25 feet of any stream channel;

5. Prior to the commencement of construction, the Applicant shall coordinate with ODNR concerning the Uhler's sundragon to determine if the temporary impacts to wetlands would impact this species;

6. The Applicant shall avoid, where possible, any damage to field drainage systems resulting from construction of the facility in agricultural areas. Damaged systems shall be repaired to at least original conditions at the Applicant's expense. Severely compacted soils shall be plowed, if necessary, to restore them to original condition;

7. The Applicant will coordinate all traffic (vehicular and pedestrian) related issues with the appropriate entities to ensure that traffic will be maintained along public roadways and diverted as necessary on the levy pathway during construction;

8. The Applicant will submit a Phase I archaeological survey and recommendations to Staff for review and approval;

9. The Applicant shall secure all necessary easements prior to the commencement of construction.

Summary: Staff Report of Investigation electronically filed by Mr. Matt Butler on behalf of Staff of OPSB