

BEFORE THE OHIO POWER SITING BOARD

In the Matter of the Application for a)	
Certificate of Environmental)	Case No. 14-1280-EL-BSB
Compatibility and Public Need for the)	
Gable Substation Project)	

AEP OHIO TRANSMISSION COMPANY’S MOTION FOR WAIVER

Pursuant to Rule 4906-5-04(B), Ohio Administrative Code (“O.A.C.”), AEP Ohio Transmission Company (“AEP Ohio Transco”) hereby requests a waiver from the requirement of submitting fully developed information on an alternative site for the Gable Substation. As discussed in the accompanying Memorandum in Support, good cause exists for granting the waiver.

WHEREFORE, AEP Ohio Transco respectfully requests that the Ohio Power Siting Board grant this motion for waiver.

Respectfully submitted,

/s/ Yazen Alami

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MEMORANDUM IN SUPPORT

I. Introduction

On September 8, 2014, AEP Ohio Transmission Company (“AEP Ohio Transco” or “Applicant”) filed a Pre-Application Notification Letter concerning its application for a certificate of environmental compatibility and public need to reinforce its transmission system in eastern Ohio by constructing a new 138 kV transmission substation in Wells Township of Jefferson County. The proposed Gable Substation will allow AEP to increase the reliability of the electric transmission grid in the eastern Ohio area. The new substation will reduce the likelihood of outages and speed restoration by dividing the existing transmission lines into smaller sections. AEP Ohio Transco intends to file the full Gable Substation application very soon.

II. Rule 4906-5-04 of the Ohio Administrative Code

Rule 4906-5-04(A), O.A.C., requires that all applications for electric power transmission facilities include information on two sites. Rule 4906-5-04(B), O.A.C., provides that for good cause shown, the Board or the administrative law judge may waive the requirement of fully developed information on an alternative site.

AEP Ohio Transco proposes to install a 138 kV transmission switching substation near Smithfield, Ohio, which is located in Jefferson County. During August and September 2014, AEP Ohio Transco’s consultant, URS Corporation (“URS”), conducted a Site Selection Study for the proposed Gable Substation. The goal of the Site Selection Study was to identify viable site locations based on the siting criteria while avoiding or limiting impacts to sensitive land uses

and ecological and cultural features in the project vicinity. The study area was reviewed based on desktop data and a windshield survey.

While many properties within the extended area were initially considered, six properties that appeared to provide the best opportunities for a substation site were evaluated further. These six potential sites were evaluated, compared, and ranked to aid in the selection of the best candidates. The results of the Site Selection Study suggested that Site 5 appeared to be the most viable candidate. As AEP owns the overall property, Site 5 was selected by AEP Ohio Transco as one of the candidates to be further considered.

In July, August, and September 2014, ecological and cultural resource field surveys were conducted on Site 5 to investigate the presence of sensitive resources on the overall property. No wetlands, streams, sensitive habitats, or cultural resources were identified. Based on the results of the Site Selection Study and field surveys, AEP Ohio Transco selected Site 5 as the preliminary Preferred Site for the Gable Substation. Due to the relative lack of impacts to ecological, cultural, and land use resources, as well as AEP's current ownership of the Preferred Site property, expending additional resources to develop information for an alternate site is unwarranted. Therefore, good cause exists for granting the requested waiver.

III. Conclusion

Good cause exists for granting this waiver request. Accordingly, pursuant to Rule 4906-5-04(B), AEP Ohio Transco respectfully requests that the Board or the administrative law judge grant a waiver from the requirement that the Gable Substation application include fully developed information on an alternate site.

Respectfully submitted,

/s/ Yazen Alami

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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

10/13/2014 3:35:34 PM

in

Case No(s). 14-1280-EL-BSB

Summary: Motion for Waiver and Memorandum in Support electronically filed by Mr. Yazen Alami on behalf of AEP Ohio Transmission Company