

BEFORE THE
OHIO POWER SITING BOARD

In the Matter of the Application of)	
American Transmission Systems, Incorporated)	Case Numbers:
for a Certificate of Environmental Compatibility)	14-2162-EL-BSB
and Public Need for the Lake Avenue Substation)	
Project)	

INITIAL TESTIMONY OF

NATALIYA BRYKSENKOVA

ON BEHALF OF

AMERICAN TRANSMISSION SYSTEMS, INCORPORATED

1 **TESTIMONY OF MS. NATALIYA BRYKSENKOVA**
2

3 **INTRODUCTION AND PURPOSE**

4 **Q. PLEASE STATE YOUR NAME, EMPLOYER, BUSINESS ADDRESS AND**
5 **POSITION.**

6 A. My name is Nataliya Bryksenkova. I am employed by the FirstEnergy Service Company. My
7 business address is 76 South Main Street, Akron, Ohio 44308. I am an Engineer IV in the
8 Transmission Engineering Group of the Energy Delivery organizational unit.
9

10 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS CASE?**

11 A. I am sponsoring the Application for a Certificate of Environmental Compatibility and Public
12 Need for the Lake Avenue Substation on behalf of American Transmission Systems,
13 Incorporated, the Applicant in this proceeding.
14

15 **OBSERVATIONS THAT WILL ASSIST THE READER WITH**

16 **UNDERSTANDING THIS TESTIMONY**
17

18 **Q. BEFORE TURNING TO SUBSTANTIVE MATTERS, DO YOU HAVE ANY**
19 **OBSERVATIONS THAT WILL ASSIST THE READER WITH UNDERSTANDING**
20 **THIS TESTIMONY?**

21 A. Yes. My testimony is being submitted in the proceeding for Lake Avenue Substation project
22 (Ohio Power Siting Board Case No. 14-2162-EL-BSB).

1 Unless otherwise indicated, capitalized terms that are used in my testimony have the same
2 meaning as the same capitalized terms have in the Application. The common terms used in
3 my testimony are as follows:

4 **Application:** means the Application of American Transmission Systems, Incorporated for a
5 Certificate of Environmental Compatibility and Public Need for the Lake Avenue Substation.

6 **Applicant:** means American Transmission Systems, Incorporated.

7 **ATSI:** means American Transmission Systems, Incorporated, the Applicant in this
8 proceeding.

9 **Lake Avenue Substation:** means the new substation at either the proposed Preferred or
10 Alternate Site of the proposed Project.

11 **OPSB:** means the Ohio Power Siting Board.

12 **Project:** means the proposed Lake Avenue Substation Project.

13
14 Also, I note that the Application is filed with the OPSB and posted on the Board's website,
15 and is therefore available to all parties who have been granted intervention and other
16 interested parties.

17
18 Finally and again speaking as sponsor of the Application, in the unlikely event that there is a
19 difference between data or information provided in my prefiled testimony and the
20 Application, the data or information in my prefiled testimony will control.

1 **SUMMARY OF EMPLOYMENT HISTORY, EDUCATION AND INVOLVEMENT IN**
2 **PROJECT**

3
4 **Q. HOW LONG HAVE YOU BEEN EMPLOYED BY FIRSTENERGY SERVICE**
5 **COMPANY, FIRSTENERGY CORP., OR ITS OTHER SUBSIDIARIES OR**
6 **PREDECESSOR COMPANIES?**

7 A. I have been employed by FirstEnergy Service Company continuously since March 26th,
8 2010, for a total of approximately 5.5 years.

9
10 **Q. WHAT IS YOUR CURRENT JOB TITLE?**

11 A. I am an Engineer in the Transmission Engineering Group of the Energy Delivery
12 organizational unit.

13
14 **Q. HOW LONG HAVE YOU BEEN IN YOUR CURRENT POSITION?**

15 A. I have been in my current position as an Engineer since November 2014.

16
17 **Q. PLEASE DESCRIBE YOUR CURRENT POSITION.**

18 A. In this position I provide support for the efforts of FirstEnergy and its subsidiaries, including
19 ATSI, to site new transmission facilities by assisting in the development of transmission line
20 route siting studies, transmission substation siting studies, and associated regulatory filings,
21 including applications to the Ohio Power Siting Board. This involves working with internal
22 and external resources that include FirstEnergy's Legal-Regulatory, Real Estate,
23 Transmission Engineering, Customer Support, External Affairs Managers, Environmental

1 Permitting & Compliance, Vegetation Management, Operations Support, Transmission Lines
2 Services Department, Public Communications, Regional Organizations, Area Managers, and
3 Asset Management Departments.

4
5 **Q. PLEASE DESCRIBE BRIEFLY AND GENERALLY THE POSITIONS YOU HAVE**
6 **HELD IN YOUR CAREER WITH FIRSTENERGY.**

7 A. I was hired by FirstEnergy Service Company in March 2010. The general sequence and time
8 frame of my positions with FirstEnergy are as follows: From March 2010 to October 2011, I
9 was working as a contract employee in the Drawings and Standards Group. In 2011, I was
10 transferred to Transmission Design Group. In August 2012, I was hired full-time as an
11 Advanced Engineer, and continued working in Transmission Design Group until October
12 2014. In October 2014, I was transferred to Transmission Siting Group as an Engineer IV
13 performing transmission line siting tasks. My current assignment includes leading and
14 assisting in the coordination of environmental studies and regulatory permitting for
15 FirstEnergy's transmission projects.

16
17 **Q. STARTING AFTER HIGH SCHOOL GRADUATION, PLEASE TELL US YOUR**
18 **EDUCATIONAL BACKGROUND.**

19 A. I earned a Bachelor of Science degree in Mechanical Engineering in June 1990 from the
20 Polytechnic University, Saint Petersburg, Russia.

21
22 **Q. DO YOU HAVE ANY PROFESSIONAL LICENSES OR CERTIFICATIONS?**

23 A. No.

1 **Q. HAVE YOU EVER HAD TO TESTIFY PREVIOUSLY IN OHIO POWER SITING**
2 **BOARD OR OTHER ELECTRIC-UTILITY PROCEEDINGS?**

3 A. No.

4
5 **Q. HAVE YOU BEEN INVOLVED ON OTHER PROJECTS REQUIRING SUBMITTAL**
6 **OF OTHER TYPES OF SITING FILINGS FOR APPROVAL OF THE**
7 **CONSTRUCTION OF OTHER ELECTRIC TRANSMISSION PROJECTS?**

8 A. Yes, I have either prepared or participated in the preparation of a Construction Notice filing
9 with the Ohio Power Siting Board, four Letter of Notification filings with the Ohio Power
10 Siting Board, and a Letter of Notification filing with the Pennsylvania Public Utility
11 Commission.

12
13 **Q. WHAT IS YOUR ROLE ON THE PROJECT?**

14 A. I am the person responsible for coordinating the Applicant's efforts to obtain the OPSB's
15 authorization to construct the proposed Project. As such, I am responsible for the overall
16 Project, including the Site Selection Study, the preparation of the Application, filing the
17 Application with the OPSB and acting as the Applicants' lead representative to the OPSB
18 Staff throughout the Board's regulatory process.

19
20 **Q. GO ON.**

21 A. In this role, I worked with the subject matter experts with expertise on the various topics that
22 are described in Chapter 4906-15 of the Board's regulations. The subject matter experts

1 were drawn from qualified employees of the Applicant or the Applicant's affiliates or, in
2 some cases, from qualified external consulting firms.

3
4 **Q. DO YOU HOLD FINAL DECISION-MAKING AUTHORITY FOR THE PROJECT?**

5 A. No. The Applicant's executives hold final decision-making authority for the Project. My role
6 is to formulate issues and recommendations for executive review and approval and to
7 implement the executives' decisions and guidance. As such, I hold responsibility for
8 identifying issues that require executive authorization, presentation of such issues to the
9 executives - including answering questions from the executives, and then executing on
10 executive decisions and direction. In this role, I was the project lead for preparation of the
11 Application draft that was presented for executive authorization. Once the executives
12 approved filing of the Application, I was responsible for acting as the Applicant's lead
13 representative to the OPSB Staff throughout the OPSB's regulatory process.

14
15 **Q. PLEASE IDENTIFY THE RESOURCES THAT WERE AND ARE AVAILABLE TO**
16 **YOU AS YOU PERFORM YOUR DUTIES IN THIS MATTER.**

17 A. I received and continue to receive assistance from the subject matter experts. In addition, I
18 obtained and continue to obtain assistance on an "as needed" basis from other internal
19 FirstEnergy (and affiliated company) personnel in engineering, real estate, regulatory, asset
20 management, legal, construction, forestry, procurement, customer relations, area and
21 community relations, and communications resources. Finally, acting pursuant to executive
22 direction, I have access to and, on an "as needed" basis have receive, assistance from external
23 resources, such as Burns & McDonnell Engineering Company, Inc. ("Burns & McDonnell").

1 **OVERVIEW OF THE APPLICATION**

2

3 **Q. WHAT IS THE PURPOSE OF THIS PART OF YOUR TESTIMONY?**

4 A. This section of my prefiled testimony will provide a summary of the history of the
5 Application and how the Application is organized and will briefly summarize each section of
6 the Application.

7

8 **Q. PRIOR TO THE FILING OF THE APPLICATION WITH THE OPSB, DID THE**
9 **APPLICANT REQUEST ANY WAIVERS?**

10 A. Yes, Applicant requested on March 6, 2015 a limited partial waiver on the need to submit
11 fully developed EMF data on the Alternate Site in the Application. The waiver was requested
12 because fully developed EMF data on the Alternate Site would be costly and time consuming
13 to prepare and would be largely duplicative of the information in the Application for the
14 Preferred Site. The Administrative Law Judge granted this request for a limited partial waiver
15 on June 15, 2015.

16

17 **Q. HOW IS THE APPLICATION ORGANIZED?**

18 A. The Application was submitted in Docket No. 14-2162-EL-BSB.

19 The Application was prepared in accordance with the OPSB's rules as provided in Chapter
20 4906-15 of the Ohio Administrative Code which is titled "Instructions for the Preparation of
21 Certificate Applications for Electric Power, Gas and Natural Gas Transmission Facilities."
22 This chapter of the OPSB's rules is divided into seven second level divisions, sections 4906-
23 15-01 through 4906-15-07. The OPSB's rules generally instruct an applicant to provide

1 narrative and other data in response to each section, section titles, subsection, and
2 subheadings. Most of the sub-subheadings direct the applicant to provide information on
3 maps or figures and typically do not require a narrative response.

4
5 The Application mirrors the organization of Chapter 4906-15 of the Ohio Administrative
6 Code. Thus, the Application is organized into seven sections, each of which corresponds to
7 the sections in Chapter 4906-15-01 through 4906-15-07 of the OPSB rules. Each page of
8 each section is numbered with identification unique to that section, for example the page
9 numbers of the section corresponding to section 4906-15-01 are number 01-1, 01-2, 01-3,
10 etc. Further, the various Tables, Exhibits and Appendixes of each section also utilize a
11 similar numbering nomenclature. The sections of the Application are further divided to
12 correspond to the section titles, subsection titles, subheadings and sub-subheadings, each of
13 which is numbered with a heading that corresponds to the associated parts of Chapter 4906-
14 15 of the OPSB rules. Where the appropriate response to the OPSB rules requires inclusion
15 of information on a map, exhibit or similar document, more so for the sub-subheading
16 aspects of the rules, the information is provided on a map or exhibit and usually described in
17 the narrative of the next higher division.

18
19 **Q. PLEASE BRIEFLY SUMMARIZE EACH SECTION OF THE APPLICATION.**

20 A. The Application was submitted to the OPSB on March 6, 2015. The Application for the
21 Project was submitted in a single volume marked as the Lake Avenue Substation Project.

1 The seven sections of the Application are:

- 2 • Section 1 - Project Summary and Facility Overview, beginning at page 1-1 of the
3 Application, addresses the requirements of the OPSB rules provided in Ohio
4 Administrative Code Section No. 4906-15-01 – Project Summary and Facility
5 Overview;
- 6 • Section 2 – Review of Need for Proposed Project, beginning at page 2-1 of the
7 Application, addresses the requirements of the OPSB rules provided in Ohio
8 Administrative Code Section No. 4906-15-02 – Review of Need for Proposed Project;
- 9 • Section 3 – Site Alternatives Analysis, beginning at page 3-1 of the Application, of
10 the Application addresses the requirements of the OPSB rules provided in Ohio
11 Administrative Code Section No. 4906-15-03 – Site and Route Alternatives Analysis;
- 12 • Section 4 – Technical Data, beginning at page 4-1 of the Application, of the
13 Application addresses the requirements of the OPSB rules provided in Ohio
14 Administrative Code Section No. 4906-15-04 – Technical Data;
- 15 • Section 5 – Financial Data, beginning at page 5-1 of the Application, of the
16 Application addresses the requirements of the OPSB rules provided in Ohio
17 Administrative Code Section No. 4906-15-05 – Financial Data;
- 18 • Section 6 - Socioeconomic and Land Use Impact Analysis, beginning at page 6-1 of
19 the Application, of the Application addresses the requirements of the OPSB rules
20 provided in Ohio Administrative Code Section No. 4906-15-06 – Socioeconomic and
21 Land Use Impact Analysis; and

1 **Q. TO THE BEST OF YOUR INFORMATION AND BELIEF IS THE APPLICATION**
2 **SUBMITTED TO THE OHIO POWER SITING BOARD COMPLETE AND**
3 **ACCURATE?**

4 A. Yes, having reviewed the entire Application and been responsible for the collection and
5 development of the information in the Application, I believe to the best of my knowledge and
6 belief that the information in the Application is true, accurate and complete.

7
8 **Q. DOES THIS CONCLUDE YOUR INITIAL DIRECT TESTIMONY?**

9 A. Yes it does. However, I reserve the right to supplement my initial testimony if anything
10 changes with respect to the status of the Application, the Staff's Recommended Conditions,
11 or for the development of any stipulations with the Staff or intervening party.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Initial Testimony of Nataliya Bryksenkova* was served upon the following persons by electronic filing and by emailing a copy on August 18, 2015 to:

John Jones
Assistant Attorney General, Public Utilities Section
Office of the Ohio Attorney General
30 East Broad Street
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s/Robert J. Schmidt _____
Robert J. Schmidt

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Summary: Testimony of Nataliya Bryksenkova on behalf of Applicant, American Transmission Systems, Incorporated electronically filed by Mr. Robert J Schmidt on behalf of American Transmission Systems Inc.