

**Legal Department** 

American Electric Power 1 Riverside Plaza Columbus, OH 43215-2373 AEP.com

May 24, 2017

Re:

Chairman Asim Z. Haque Ohio Power Siting Board 180 East Broad Street Columbus, Ohio 43215

Case No. 17-1315-EL-BNR Pre-Application Notification: In the Matter of the Construction Notice for the Middleboro Switch Extension

Dear Chairman Haque,

AEP Ohio Transmission Company, Inc. ("AEP Ohio Transco") files this preapplication notification letter in accordance with Rule 4906-6-03(A) Ohio Administrative Code (O.A.C.).

AEP Ohio Transco proposes to build a single steel pole structure at the existing Middlesboro Switch location. Dayton Power and Light (DP&L) has an associated project (17-1240-EL-BNR). PJM is requiring relocation of the existing DP&L and AEP metering point at that existing Middleboro Substation by June 1, 2017.

The construction schedule for this Project is based upon an agreement between PJM and DP&L. AEP is requesting as timely a review as possible to assist DP&L in completing this project based upon their agreement with PJM.

In its application, DP&L requested an approval date in advance of the time periods provided for under the rules for expedited applications. AEP Ohio Transco respectfully requests a waiver of these time periods for the same reason, and that its construction notice for this project be approved at the same time as DP&L's.

To facilitate the expedited review requested, AEP Ohio Transco attaches a copy of the Construction Notice for the above-referenced project together with this preapplication notification letter, subject to the provisions of O.A.C. Section 4906-6-05, 4906-6-04, and 4906-6-03(A).

Hector Garcia Senior Counsel – Regulatory Services (614) 716-3410 (P) (614) 716-2014 (F)

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A copy of this filing will also be submitted to the executive director or the executive director's designee. A copy is also being provided to the OPSB Staff via electronic message. The Company will also submit a check in the amount of \$2,000 to the Treasurer, State of Ohio, for Fund 5610 for the expedited fees.

Respectfully Submitted,

/s/ Hector Garcia

#### **Hector Garcia**

Counsel for AEP Ohio Transmission Company, Inc.

cc: Werner Margard, Counsel OPSB Staff Jon Pawley, OPSB Staff

Construction
Notice for the
Middleboro Switch
138kV Transmission
Line Extension
Project



PUCO Case No. 17-1315-EL-BNR

Submitted to: The Ohio Power Siting Board Pursuant to Ohio Administrative Code Section 4906-6-05

Submitted by: AEP Ohio Transmission Company, Inc.

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#### Construction Notice

#### **Middleboro 138kV Transmission Line Extension Project**

4906-6-05

AEP Ohio Transmission Company, Inc. ("AEP Ohio Transco") is providing the following information to the Ohio Power Siting Board ("OPSB") in accordance with the accelerated request of Ohio Administrative Code Section 4906-6-05.

4906-6-5(B) General Information

#### **B(1) Project Description**

The name of the project and applicant's reference number, names and reference number(s) of resulting circuits, a brief description of the project, and why the project meets the requirements for a Construction Notice.

AEP Ohio Transco is proposing the Middlesboro Switch 138kV Transmission Line Extension Project ("Project"), located in Warren County, Ohio.

Dayton Power and Light (DP&L) and AEP own an existing, 53.4 mile tie-line interconnection from Hutchings (DP&L) to Hillsboro (AEP). The interconnection metering point is at Hutchings; therefore, the tie-line is in AEP's transmission zone. There is a 3 MW DP&L load served off this tie line at Middleboro Station. However, beginning January 1, 2016, due to the competitive market, the load will no longer be served by DP&L. To avoid the associated settlement issues, DP&L has proposed to move the interconnection metering point to Middleboro (DP&L), 30.98 miles toward Hillsboro (AEP). The proposed modifications will include a physical reconfiguration of AEP's Middleboro Switch by removing the tap to the Northwest towards DP&L's Hutchings Station and rerouting the electrical through-path to go through DP&L's Middleboro Station. **AEP will be installing a single steel pole as a result of this project.** 

Figure 1 shows the location of the Project. Figures 2 shows how the metering location will change at Middlesboro Switch, and Figure 3 shows there are no cultural resources that have been identified within the project area.

The Project meets the requirements for a Construction Notice ("CN") because it is within the types of projects defined by 1(a) of Ohio Administrative Code Section 4906-1-01 Appendix A of the Application Requirement Matrix For Electric Power Transmission Lines:

- (1) New construction, extension, or relocation of single or multiple circuit electric power transmission line(s), or upgrading existing transmission or distribution line(s) for operation at a higher transmission voltage, as follows:
  - (a) Line(s) not greater than 0.2 miles in length.

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The Project has been assigned PUCO Case No. 17-1315-EL-BNR.

#### **B(2) Statement of Need**

If the proposed project is an electric power transmission line or gas or natural gas transmission line, a statement explaining the need for the proposed facility.

To address a retail wheeling settlements issue, PJM requires relocation of the existing DP&L and AEP metering points at the existing Middleboro Substation by June 1, 2017. Currently, Middleboro Substation is tapped off the Hutchings- Hillsboro 138kV line. This project will reconfigure Middleboro Substation to a low through configuration, thereby providing for a single metering point located at Middleboro Substation, which will facilitate the PJM settlements process.

#### **B(3) Project Location**

The applicant shall provide the location of the project in relation to existing or proposed lines and substations shown on an area system map of sufficient scale and size to show existing and proposed transmission facilities in the project area.

Figure 1 identifies the location project within Warren County, Ohio.

#### **B(4) Alternatives Considered**

The applicant shall describe the alternatives considered and reasons why the proposed location or route is best suited for the proposed facility. The discussion shall include, but not be limited to, impacts associated with socioeconomic, ecological, construction, or engineering aspects of the project.

There are no alternatives for this project. Based on the small scope of the project and limited alternatives to achieve a flow through configuration, it was not reasonable to study other options. The proposed option has the fewest effects and is the most cost efficient solution to achieve the desired electrical configuration.

#### **B(5) Public Information Program**

The applicant shall describe its public information program to inform affected property owners and tenants of the nature of the project and the proposed timeframe for project construction and restoration activities.

The entire construction of the single steel pole will be within AEP's easement and will be accessed through DP&L's property.

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#### **B(6) Construction Schedule**

The applicant shall provide an anticipated construction schedule and proposed in-service date of the project.

Based upon an agreement between DP&L and PJM, this project is required as soon as possible.

#### B(7) Area Map

The applicant shall provide a map of at least 1:24,000 scale clearly depicting the facility with clearly marked streets, roads, and highways, and an aerial image.

Figure 1 and Figure 2 identify the location of the Project and the associated changes that will be occurring. Please note that AEP will only be constructing a single steel pole. The other modifications to the station are included in DP&L's project (17-1240-EL-BNR). To visit the Project from Columbus, take I-71 South toward Cincinnati. Take exit 45 for OH-73 toward Waynesville and turn left onto OH-73 E. Turn right onto OH-380 South for 3.5 miles. In 2.5 miles turn left onto Creek Road. Then turn right onto North 1st Street. Continue onto OH-132 South for 4.4 miles. Turn left onto Middlesboro Road. The station will be on the right in approximately 0.8 miles.

#### **B(8) Property Agreements**

The applicant shall provide a list of properties for which the applicant has obtained easements, options, and/or land use agreements necessary to construct and operate the facility and a list of the additional properties for which such agreements have not been obtained.

All work will be performed on DP&L's land and will within AEP Ohio Transco's current easement for the Hillsboro-Hutchings 138kV circuit. No other property easements, options, or land use agreements are necessary to construct the Project or operate the transmission line.

#### **B(9) Technical Features**

The applicant shall describe the following information regarding the technical features of the Project:

B(9)(a) Operating characteristics, estimated number and types of structures required, and right-of-way and/or land requirements.

The Project involves the installation of a single dead-end steel structure at 120 feet tall. A structure diagram is presented as Figure 4. All of the proposed transmission line work will occur within existing AEP Ohio Transco ROW.

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#### **B(9)(b) Electric and Magnetic Fields**

For electric power transmission lines that are within one hundred feet of an occupied residence or institution, the production of electric and magnetic fields during the operation of the proposed electric power transmission line. The discussion shall include:

#### B(9)(b)(i) Calculated Electric and Magnetic Field Strength Levels

This section is not applicable. There are no occupied residences or institutions located within 100 feet of the Project.

#### B(9)(b)(ii) Design Alternatives

A discussion of the applicant's consideration of design alternatives with respect to electric and magnetic fields and their strength levels, including alternate conductor configuration and phasing, tower height, corridor location, and right-of-way width.

The transmission line work associated with the Project will occur on existing AEP Ohio Transco property. Therefore, no design alternatives were considered.

#### B(9)(b)(ii)(c) Project Cost

#### The estimated capital cost of the project.

The capital costs estimate for the proposed Project, comprised of applicable tangible and capital costs, is approximately \$150,000.

#### **B(10) Social and Economic Impacts**

The applicant shall describe the social and ecological impacts of the project.

#### **B(10)(a) Operating Characteristics**

Provide a brief, general description of land use within the vicinity of the proposed project, including a list of municipalities, townships, and counties affected.

The Project is located in the Harlan Township, Warren County, Ohio. The land in the vicinity of the proposed project is residential and agricultural. Due to the small scope of this project and the fact that the entirety of the work will be contained to the existing DP&L Middleboro Substation property, no effects are anticipated with respect to land use in the vicinity of the project.

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#### B(10)(b) Agricultural Land Information

Provide the acreage and a general description of all agricultural land, and separately all agricultural district land, existing at least sixty days prior to submission of the application within the potential disturbance area of the project.

No agricultural land will be impacted by this project since the entirety of the work is within existing DP&L property.

#### B(10)(c) Archaeological and Cultural Resources

Provide a description of the applicant's investigation concerning the presence or absence of significant archeological or cultural resources that may be located within the potential disturbance area of the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.

Figure 3 depicts an online review of the State Historic Preservation Office Online GIS website. No cultural resources were identified within or in proximity to the study area.

#### B(10)(d) Local, State, and Federal Agency Correspondence

Provide a list of the local, state, and federal governmental agencies known to have requirements that must be met in connection with the construction of the project, and a list of documents that have been or are being filed with those agencies in connection with siting and constructing the project.

The project will be the installation of a single steel pole. This activity is below the reporting levels for an OEPA Stormwater Pollution Prevention Plan. No other local, state, or federal permits are applicable.

#### B(10)(e) Threatened, Endangered, and Rare Species

Provide a description of the applicant's investigation concerning the presence or absence of federal and state designated species (including endangered species, threatened species, rare species, species proposed for listing, species under review for listing, and species of special interest) that may be located within the potential disturbance area of the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.

The United States Fish and Wildlife Service ("USFWS") Federally Listed Species by Ohio Counties October 2015 (available at www.fws.gov/midwest/ohio/pdf/OhioTEListByCountyOct2015.pdf) was reviewed to determine the threatened and endangered species currently known to occur in Warren County. This USFWS publication lists Indiana bat (Myotis sodalis; federally listed endangered), northern long-eared bat (Myotis septentrionalis; federally listed threatened, Rayed Bean Mussel; federally listed endangered, Running Buffalo Clover; federally listed endangered, Eastern Massasauga; federally listed

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threatened, and bald eagle (*Haliaeetus leucocephalus*; de-listed but still protected under the Bald and Golden Eagle Protection Act), were also on this list of species for Warren County.

The Project is within the range of the Indiana bat and northern long-eared bat. Due to this potential, the USFWS/ODNR recommends seasonal tree cutting for trees  $\geq 3$  inches diameter at breast height between October 1 and March 31 to avoid adverse impacts to this species. There is a small stand of trees that are currently under the transmission lines. The steel pole will be placed adjacent to these trees shown in Image 1 and 2. There may be the need for trimming. However, no tree clearing activities are anticipated to be required for the construction of this Project. Therefore, the Project is not likely to adversely affect those species.

There are no streams related with this project. Therefore, there will be no impacts associated with the Rayed Bean Mussel.

Running Buffalo Clover's habitat is located in areas where there is a prolonged pattern of moderate periodic disturbance. The project area as seen in Image 1 and 2 depicts undisturbed soils. Therefore, due to the absence of proper habitat and the small nature of the project impacts to Running Buffalo Clover are unlikely.

The Eastern Massasauga rattlesnake is strongly associated with wetlands across most of its range. Wet prairie, bogs, and swamps are the preferred habitat. Therefore, due to the absence of proper habitat and the small nature of the project impacts to Eastern Massasauga are unlikely.

No Bald Eagles nests were identified in the vicinity of the project. Therefore, impacts to the Bald Eagle are unlikely.

#### B(10)(f) Areas of Ecological Concern

Provide a description of the applicant's investigation concerning the presence or absence of areas of ecological concern (including national and state forests and parks, floodplains, wetlands, designated or proposed wilderness areas, national and state wild and scenic rivers, wildlife areas, wildlife refuges, wildlife management areas, and wildlife sanctuaries) that may be located within the potential disturbance area of the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.

Image 1 and 2 show the project area as hard packed lightly vegetated areas. There does not appear to be any hydrologic soils or hydric vegetation where the orange stake is placed. Therefore, wetland impacts are not anticipated. However, even if the pole location could be considered a wetland, the impact would be significantly below the 0.1 acre threshold for reporting to the Army Corps of Engineers and would be covered under a Nationwide 12 permit.

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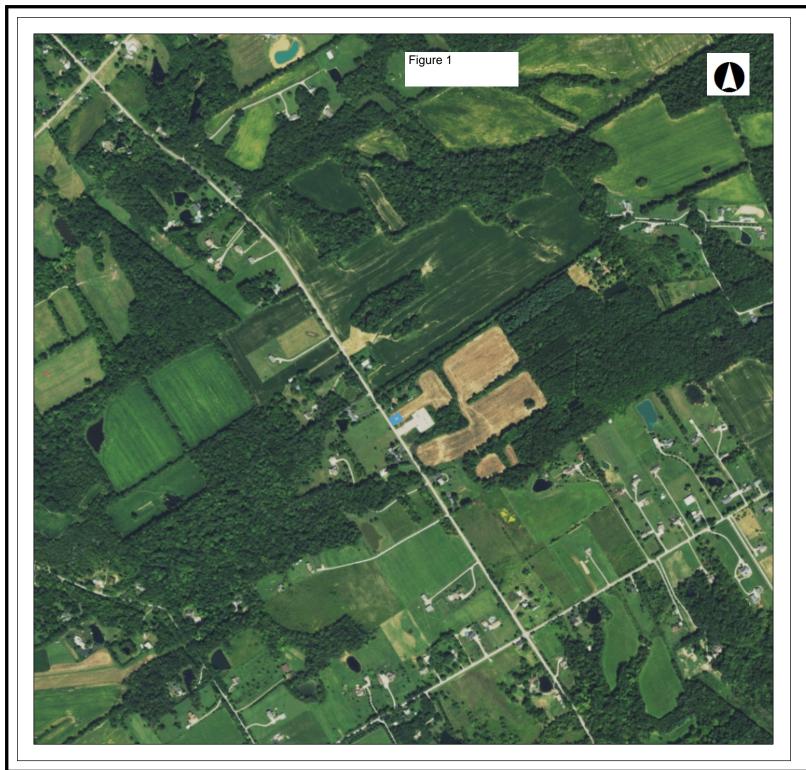
#### B(10)(g) Unusual Conditions

Provide any known additional information that will describe any unusual conditions resulting in significant environmental, social, health, or safety impacts.

To the best of AEP's knowledge, there are no known unusual conditions that would result in significant environmental, social, health, or safety impacts.

Project Figures May 24, 2017

**Project Figures** 





#### Legend

#### NR Listings

Listed

National Historic Landmark

Delisted

- NR Determinations of Eligibi
- Archaeological Sites
- Historic Structures
- Historic Bridges
- Historic Tax Credit Projects

#### **OGS** Cemeteries

Confident

Not Confident

Dams

UTM Zone Split

NR Boundaries

**OAI Site Boundaries** 

Phase1

7

Phase2

0.17

0.34 Miles

1: 13,446

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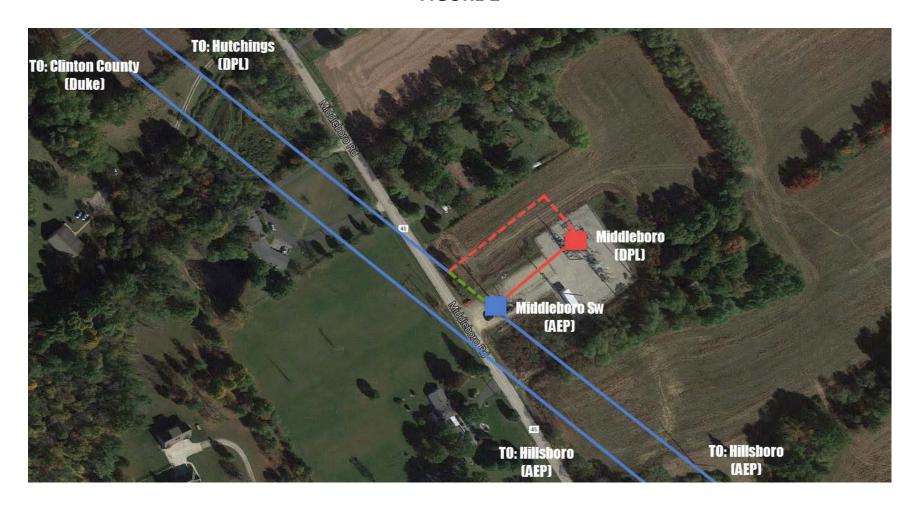
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### FIGURE 2







#### Legend

#### NR Listings

Listed



National Historic Landmark

Delisted

- NR Determinations of Eligibi
- Archaeological Sites
- Historic Structures
- Historic Bridges
- Historic Tax Credit Projects

**OGS** Cemeteries



Not Confident

Dams

UTM Zone Split

NR Boundaries

OAI Site Boundaries

Phase1

 $\overline{Z}$ Phase2

0.04 0.08 Miles

1: 3,362

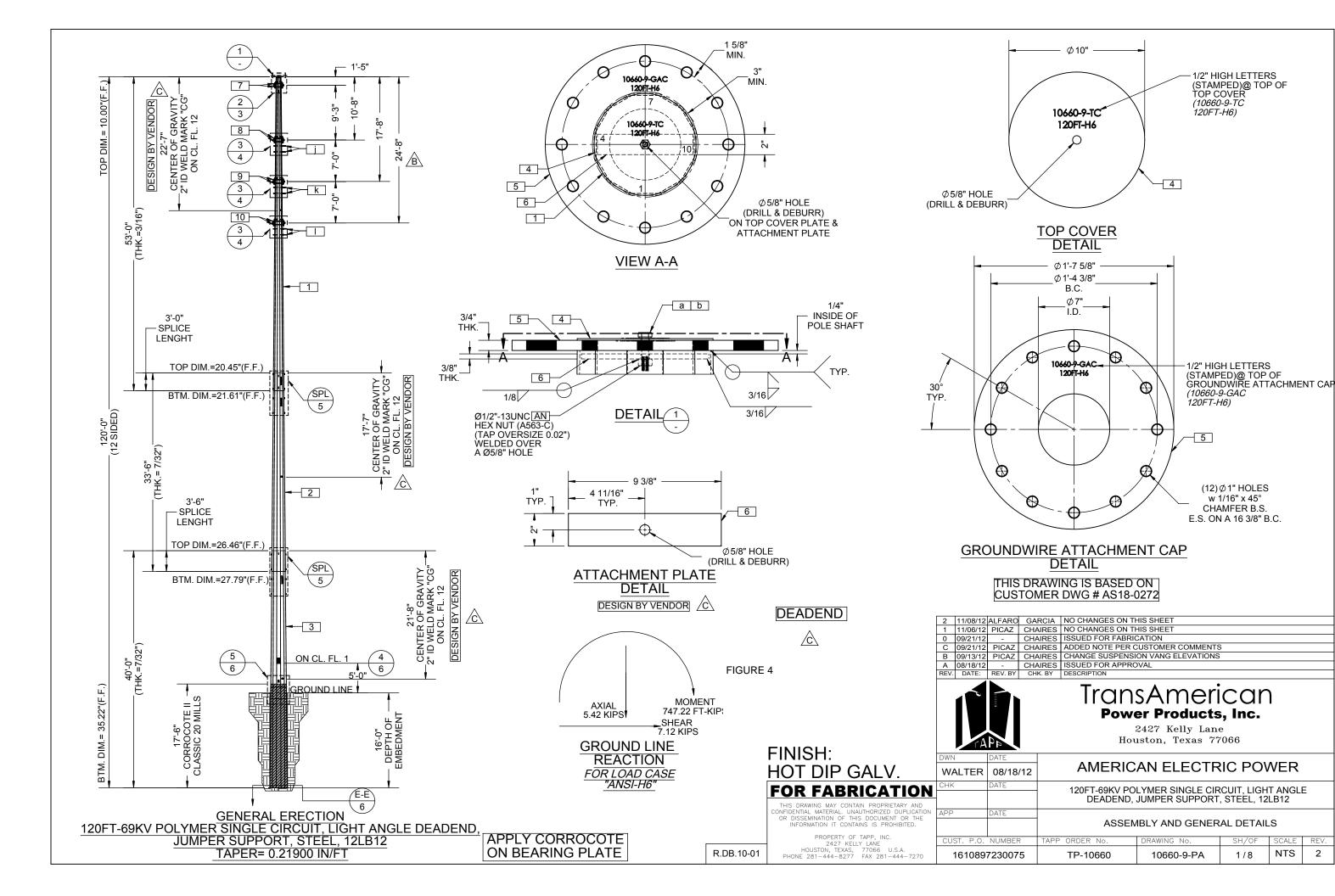
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Datum: [Datum]

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Project Figures May 24, 2017

**Project Images** 

Project Figures May 24, 2017

### IMAGE 1



Project Figures May 24, 2017

### IMAGE 2



This foregoing document was electronically filed with the Public Utilities

**Commission of Ohio Docketing Information System on** 

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in

Case No(s). 17-1315-EL-BNR

Summary: Notification electronically filed by Mr. Hector Garcia on behalf of AEP Ohio Transmission Company