

BEFORE THE POWER SITING BOARD OF THE STATE OF OHIO

In the Matter of the Expedited Letter of Notification)
Application of AEP Ohio Transmission Company for)
the Carrollton-Sunnyside 138 kV Transmission Line) **17-1318-EL-BLN**
Rebuild Project)

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 Ohio Power Siting Board (Board) rules. The accelerated certificate application in this case is subject to an automatic approval process as required by Ohio Revised Code (R.C.) 4906.03 and Ohio Administrative Code (Ohio Adm.Code) 4906-6-04.

Staff recommends the application for automatic approval on September 25, 2017, unless suspended by the Board, an administrative law judge, or the chairperson or executive director of the board for good cause shown. If suspended, the Board must render a decision on the application within 90 days from the date of suspension.

Please present any concerns you or your designee may have with this case to my office at least four business days prior to September 25, 2017, which is the automatic approval date.

Sincerely,



Patrick Donlon
Director, Rates and Analysis
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215
(614) 644-8932

OPSB STAFF REPORT OF INVESTIGATION

Case Number: 17-1318-EL-BLN
Project Name: Carrollton-Sunnyside 138 kV Transmission Line Rebuild Project
Project Location: Stark and Carroll counties
Applicant: AEP Ohio Transmission Company
Application Filing Date: June 26, 2017
Filing Type: Letter of Notification
Inspection Date: July 28, August 1, 2017
Report Date: September 18, 2017
Recommended Automatic Approval Date: September 25, 2017
Applicant's Waiver Requests: none
Staff Assigned: G. Zeto, J. Cross

Summary of Staff Recommendations (see discussion below):

Application: ☐ Approval ☐ Disapproval ☒ Approval with Conditions
Waiver: ☐ Approval ☐ Disapproval ☒ Not Applicable

Project Description

AEP Ohio Transmission Company, Inc. (AEP Ohio Transco or Applicant) proposes to rebuild approximately 19.7 miles of existing 138 kilovolt (kV) transmission line. The rebuild would occur primarily along existing right-of-way. The Applicant plans to rebuild the line approximately 40 feet offset from the current centerline along properties with blanket easements. The Applicant is working with landowners to define these easements. Additionally, approximately 0.8 mile of the rebuild will occur within completely new right-of-way to avoid physical obstructions, including residences, or to meet engineering requirements. The replacement structures would be primarily galvanized steel single pole structures with Davit arms. The Applicant proposes to begin construction in September 2017 and place the line in service by June 2019. The Applicant estimates the total cost of the project at \$50 million.

Basis of Need

AEP Ohio Transco states the project is needed to remediate significant rusting and deterioration on the lattice towers and brittle copper conductor. The existing Carrollton-Sunnyside 138kV circuit was constructed in 1916 and does not meet AEP standards. In addition to old equipment, load in the area has been increasing due to the Utica shale industry. The proposed project would allow the transmission system to provide safe, reliable electric service, while meeting all the applicable planning criteria.

Long Term Forecast

Ohio Adm.Code requires electric utilities and transmission owners to annually file a forecast report with the PUCO.¹ The report requires a 10-year plan of committed or tentatively projected projects on the bulk power transmission network. AEP Ohio Transco identified the need for the proposed transmission line project in the *2017 AEP Ohio Transmission Company Long-Term Forecast Report to the Public Utilities Commission of Ohio*.²

PJM Interconnection

The Applicant plans to discuss the proposed project at a future PJM Transmission Expansion Advisory Committee meeting. The project would be issued a PJM upgrade ID and the construction status of transmission projects will be able to be tracked on PJM's website.³

Nature of Impacts

Socioeconomic Impacts

The surrounding land use is a mix of agricultural fields, wood lots, and scattered residences. Portions of the project cross five agricultural district parcels within Stark County. The Applicant was not able to obtain information on agricultural district lands for Carroll County. Because of the nature of the project, changes to agricultural district designation would be unlikely. However, Staff recommends that the Applicant continue coordination with Staff to provide further information on agricultural districts within Carroll County to assure that impacts to agricultural districts are minimized.

The existing right-of-way and proposed offset right-of way contains several storage sheds which may require removal. No residences would be removed as a result of the project.

The Applicant sent notification about the project to area public officials and affected property owners. The Applicant is currently working with property owners on acquiring both temporary and supplemental easements for the transmission line and access roads.

Cultural Resources

The Applicant performed a Phase I cultural resource management investigation for the project in July 2017, concluding that the project would not affect any historic properties or landmarks and that no further cultural resources work is considered to be necessary for this project. The report has been provided to the Ohio Historic Preservation Office (OHPO). In order to ensure minimal impacts to historical resources, Staff recommends that the Applicant continue to coordinate with Staff and the OHPO regarding the recommendations contained in the Applicant's cultural resources survey reports.

1. Ohio Adm.Code 4901:5-5.

2. "2017 Long-Term Forecast Report to the Public Utilities Commission of Ohio," AEP Ohio Transmission Company, Public Utilities Commission of Ohio Case No. 17-1501-EL-FOR, August 4, 2017.

3. "Transmission Construction Status," PJM Interconnection, accessed September 13, 2017, <http://pjm.com/planning/rtep-upgrades-status/construct-status.aspx>.

Surface Waters

The survey corridor contains 69 streams, including 26 ephemeral streams, 29 intermittent streams, and 14 perennial streams. No poles would be located in streams. No in-water work is planned in any streams, and no permanent impacts are anticipated.

The survey corridor contains 63 wetlands totaling 28 acres. These include 16 category 2 wetlands and 47 category 1 wetlands. If pole placement within wetland becomes necessary impacts would be covered under the Army Corps of Engineers Nationwide 12 permit.

Construction access would require wetland and stream crossings. The Applicant has committed to use timber matting to avoid permanent impacts to wetlands and streams. Erosion control measures, including silt fencing, are expected to be used where appropriate to minimize runoff impacts to stream channels.

The survey corridor contains eight ponds. No impacts to these resources are anticipated.

The Applicant would submit a Notice of Intent for coverage under the Ohio Environmental Protection Agency General National Pollutant Discharge Elimination System Permit.

Approximately 1.2 miles of the proposed centerline crosses floodplain areas. Staff recommends the Applicant coordinate with the Stark and Carroll county floodplain administrators to obtain any applicable floodplain development permits prior to construction.

Threatened and Endangered Species

The state and federal listed species and/or their suitable habitat that may be found in the project area include the state and federal endangered Indiana bat (*Myotis sodalis*) and the federal threatened northern long-eared bat (*Myotis septentrionalis*). The U.S. Fish and Wildlife Service (USFWS) and the Ohio Department of Natural Resources (ODNR) recommend that removal of any trees greater than three inches in diameter only occur from October 1 through March 31, unless coordination with ODNR and USFWS allows a different course of action.

Potential nesting habitats of the state threatened least bittern (*Ixobrychus exilis*) have been identified in the project area. These include seven dense emergent wetlands totaling approximately 9.4 acres. At the time of the field surveys, these wetlands exhibited vegetation sufficient to provide potential nesting habitat. Staff recommends that no construction activities occur within this habitat from May 1 through July 31, unless coordination with ODNR allows a different course of action.

The project lies within the range of listed fish and mussel species. Due to the project location, and that there is no in-water work in perennial streams proposed for this project, no impacts to these species are anticipated. The Applicant would utilize best management practices to avoid any indirect impacts to streams through its use of erosion and sediment controls within its Stormwater Pollution Prevention Plan.

Conclusion

Staff's review of the application included consideration of the requirements listed in R.C. 4906.10. Based on Staff's review, the application meets the necessary criteria for granting a certificate. Staff recommends automatic approval of this case on November 23, 2016, provided that the following conditions are satisfied.

Conditions

- (1) Prior to the commencement of construction activities in areas that require permits or authorizations by federal or state laws and regulations, the Applicant shall obtain and comply with such permits or authorizations. The Applicant shall provide copies of permits and authorizations, including all supporting documentation, to Staff within seven days of issuance or receipt by the Applicant.
- (2) The Applicant shall provide to Staff the PJM Interconnection upgrade ID and a copy of the presentation presented at the PJM Transmission Expansion Advisory Committee or other applicable PJM committee.
- (3) The Applicant shall adhere to seasonal cutting dates of October 1 through March 31 for removal of any trees greater than three inches in diameter, unless coordination with the Ohio Department of Natural Resources (ODNR) and the U.S. Fish and Wildlife Service allows a different course of action.
- (4) The Applicant shall not conduct construction activities within potential least bittern nesting habitat from May 1 through July 31, unless coordination with the ODNR allows a different course of action.
- (5) The Applicant shall provide a copy of any floodplain permits required for construction of this project, or a copy of correspondence with the floodplain administrator showing that no permit is required, to Staff within seven days of issuance or receipt by the Applicant.
- (6) The Applicant shall not conduct mechanized clearing in wetlands or within 25 feet of any stream channel.
- (7) In order to ensure minimal impacts to historical resources, the Applicant shall continue to coordinate with Staff and the Ohio Historic Preservation Office regarding the recommendations contained in the Applicant's cultural resources survey reports.
- (8) The Applicant shall continue coordination with Staff to provide further information on agricultural districts within Carroll County to assure that impacts to agricultural districts are minimized.

This foregoing document was electronically filed with the Public Utilities

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Case No(s). 17-1318-EL-BLN

Summary: Staff Report of Investigation electronically filed by Adam Bargar on behalf of Staff of OPSB