

BEFORE THE POWER SITING BOARD OF THE STATE OF OHIO

**In the Matter of the Letter of Notification Application )  
of American Electric Power Ohio Transmission )  
Company for a Certificate of Environmental ) Case No. 18-1389-EL-BLN  
Compatibility and Public Need for the Howard-Fostoria )  
and Howard-Bucyrus Center 138 kV Transmission Line )  
Extension 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.

Staff recommends the application for automatic approval December 28, 2018, 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 December 28, 2018, which is the recommended automatic approval date.

Sincerely,



Raymond W. Strom  
Chief of Siting, Efficiency and Renewables Division  
Rates and Analysis Department  
Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, Ohio 43215  
(614) 466-7707  
[ContactOPSB@puc.state.oh.us](mailto:ContactOPSB@puc.state.oh.us)

## OPSB STAFF REPORT OF INVESTIGATION

**Case Number:** 18-1389-EL-BLN  
**Project Name:** Howard-Fostoria and Howard-Bucyrus Center 138 kV Transmission Line Extension Project  
**Project Location:** Crawford and Richland counties  
**Applicant:** American Electric Power Ohio Transmission Company  
**Application Filing Date:** September 28, 2018  
**Filing Type:** Letter of Notification  
**Inspection Date:** November 27, 2018  
**Report Date:** December 20, 2018  
**Recommended Automatic Approval Date:** December 28, 2018  
**Applicant's Waiver Requests:** none  
**Staff Assigned:** J. Pawley, J. Cross, G. Zeto

### Summary of Staff Recommendations (see discussion below):

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

### Project Description

The purpose of this project is to provide 138 kilovolt (kV) transmission support for an interconnection customer facility. The project would be located in Vernon Township, Crawford County and Sharon Township, Richland County. The project would consist of constructing 4.5 miles of new 138 kV transmission line between the existing AEP Howard Station and a future switching station for an interconnection customer. The existing Howard-Bucyrus Center 138 kV transmission line is built on lattice towers, and is designed for multiple circuit use. Currently, only one circuit occupies these towers (there is an "open arm" side of the tower structures that is unoccupied). As such, 3.9 miles of the new transmission line would be located on this open-arm side of existing lattice towers for the Howard-Bucyrus Center line.

The project would also consist of 0.5 mile of new 138 kV transmission line extension from the Howard Station to the Howard-Bucyrus Center line (connecting at Tower 3), and an additional new 0.1 mile of tie-in from the Howard-Bucyrus Center line to the interconnection substation. The future switching station would be constructed and permitted by the interconnection customer.

All work to be performed for the 3.9 miles of construction along the open arm portion of the Howard-Bucyrus Center line would utilize the existing 100-foot right-of-way. No new right-of-way would be necessary for construction of this portion of the project. The 0.5 mile portion of the project would parallel AEP's existing Howard-Fostoria 138 kV transmission line, and the Applicant would need to acquire additional 100-foot right-of-way for this section. A new

structure required for the 0.1 mile extension into the interconnection substation would be located within the existing Howard-Bucyrus Center line right-of-way. No new right-of-way would be required for this portion of the project. The existing structures for the 3.9 mile portion of the project are steel lattice tower and would not be replaced. New steel monopole structures would be needed for the 0.5 mile extension and 0.1 mile tie in portions of the project.

The Applicant anticipates that construction of this project would begin in the first quarter of 2019, and that the facility would be placed in service by approximately October 2019. The Applicant states that the total cost of the transmission line project is estimated at \$3 million, borne in its entirety by the interconnection customer.

### **Basis of Need**

The Applicant states that the facility is required pursuant to an Interconnection Construction Services Agreement (ICSA) and Interconnection Services Agreement (ISA). The ICSA and ISA for Queue ID Number U4-001, between Black Fork Wind Energy, LLC, AEP Ohio Transmission Company, Inc., and PJM Interconnection LLC (PJM), was executed April 2013 and amended April 2017.<sup>1, 2</sup>

The project was not included in the Applicant's most recent Long-Term Forecast Report (LTFR) filing. The Applicant plans to include the project in their 2019 LTFR filing.

### **Nature of Impacts**

#### *Land Use*

The project is located in a predominately rural area (approximately 95 percent of the land this project would cross is classified as agricultural) west of I-71 and north of State Route 61 (OH-61). Adjacent land uses include agricultural land used for row crops, open field and rural residential properties. No residences are located within 100 feet of the proposed project, while 13 residences are located within 1,000 feet of the project. No residential structures would need to be removed to construct this project. The Applicant states that no churches, schools, cemeteries, parks or preserves are located within 1,000 feet of the centerline of the project. By utilizing the "open arm" of an existing transmission line, and by not replacing existing structures, agricultural land use impacts are expected to be minimal. Access can be obtained to each structure along the existing right-of-way, as the terrain is relatively flat.

#### *Cultural Resources*

The Applicant's cultural resources consultant performed a literature review and Phase I cultural resource management investigation (archaeology and history/architecture) for the project in the summer of 2018. After further analysis to historic structures in the project area, the consultant determined that the project would not involve or impact any significant cultural resources or

---

1. PJM Interconnection, LLC is the regional transmission organization charged with planning for upgrades and administering the generation queue for the regional transmission system in Ohio. Generators wanting to interconnect to the bulk electric transmission system located in the PJM control area are required to submit an interconnection application for review of system impacts. The interconnection process provides for the construction of expansions and upgrades of the PJM transmission system, as needed to maintain compliance with reliability criteria with the addition of generation in its footprint.

2. PJM Interconnection, LLC, "Interconnection Service Agreement and Interconnection Service Construction Agreement, Queue ID Number U4-001," accessed December 13, 2018, <https://pjm.com/planning/services-requests.aspx>.

landmarks, and that no further cultural resource management work was considered to be necessary. The findings were submitted to the Ohio Historic Preservation Office (OHPO). The OHPO responded to the consultant in concurrence that this project would not affect historic properties.

### *Surface Waters*

The transmission line would involve five stream crossings, including two intermittent streams and one perennial stream. One intermittent stream would be crossed three times by the proposed transmission line. No in-water work is proposed so no direct impacts are anticipated. The proposed transmission line would cross a 100-year floodplain. The Applicant stated that it would contact the floodplain coordinator in Richland County to determine if a floodplain permit is necessary.

The project area contains one category 1 wetland. No wetland fill is proposed for this project. Further details about how the streams and wetland would be protected from indirect construction stormwater impacts using erosion and sedimentation controls would be outlined in the Applicant's Stormwater Pollution Prevention Plan to be submitted as part of the required National Pollutant Discharge Elimination System permit.

### *Threatened and Endangered Species*

Some tree clearing would be required for this project. The project area is within the range of state and federal endangered Indiana bat (*Myotis sodalis*) and the federal threatened northern long-eared bat (*Myotis septentrionalis*). As tree roosting species in the summer months, the habitat of these species would be impacted by the project. In order to avoid impacts to the Indiana bat and northern long-eared bat, Staff recommends that the Applicant adhere to seasonal tree cutting dates of October 1 through March 31 for all trees three inches or greater in diameter, unless coordination efforts with the Ohio Department of Natural Resources and the U.S. Fish and Wildlife Service allows a different course of action. The proposed project is expected not to impact any bat hibernacula.

Due to no proposed in-water work and a lack of suitable habitats, impacts to other state and federal listed species are not anticipated.

### **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. Subject to the following condition, Staff recommends automatic approval of this application on December 28, 2018.

### **Condition:**

- (1) 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 and the U.S. Fish and Wildlife Service allows a different course of action.

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**12/20/2018 1:44:26 PM**

**in**

**Case No(s). 18-1389-EL-BLN**

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