BEFORE
THE OHIO POWER SITING BOARD

In the Matter of the Application of Duke Energy Ohio, Inc., for a Letter of Notification for the Garver T-Loop	)))	Case No. 19-49-EL-BLN
In the Matter of the Application of Duke Energy Ohio, Inc., for a Letter of Notification for a New Line to AK Steel	)))	Case No. 19-50-EL-BLN

NTE OHIO, LLC COMMENTS

I. INTRODUCTION

On January 31, 2019, Duke Energy Ohio, Inc. ("Duke Energy") filed two accelerated applications for certificate**s** of environmental compatibility and public need to construct and operate transmission facilities. The first application seeks to replace an existing lattice tower and six wood poles with steel poles, and install 11 new steel poles to extend and route three transmission lines into the proposed 138-kV substation yard at the Garver Substation, (Case No. 19-49-EL-BLN). The second application proposes to install a new 138-kilovolt (kV) transmission line for 1.2 miles from the planned 138kV Garver Substation yard to the existing AK Steel Substation (Case No. 19-50-EL-BLN). Portions of the transmission lines will cross NTE Ohio, LLC's ("NTE") property, where the Middletown Energy Center ("MEC") is located. NTE has not granted Duke Energy an easement for these overhead lines.

On February 11, 2019, NTE filed motions to intervene in the above referenced cases, indicating that the proposed route of the transmission lines will interfere with NTE's planned utilization of its property. In the motions to intervene, NTE stated that it would submit

comments to the Ohio Power Siting Board ("OPSB" or "Board") with more details surrounding these uses by February 15, 2019.

II. COMMENTS

As stated in its motions to intervene, NTE plans to utilize the areas of its property that will be impacted by Duke Energy's proposed transmission lines for any of the following purposes: (1) location of a black start facility/power plant; (2) for outage support (either during NTE's major planned maintenance and/or during an unplanned outage of similar scope); or (3) location for the expansion of the MEC, with a combustion turbine generator peaking power plant facility. More detail about each of these potential uses for the areas of NTE property that Duke Energy proposes to cross with its transmission lines is provided below.

1. Location for Black Start Facility on MEC site.

If a blackout of the electrical grid were to occur, it would be necessary to have a means to support bringing the electrical grid back into operation. The deployment of emergency generators in strategic locations throughout the PJM Interconnection ("PJM") region, including Ohio, will allow for a rapid response to blackout conditions, facilitating the safe re-energizing of the electrical grid. This serves an important role in getting a power grid back up following a system blackout.

NTE has plans to add "black start" capabilities to the MEC facility. This black start facility will consist of multiple (i.e. 4-5) internal combustion engines, generators, and supporting auxiliary equipment (small power plant). Importantly, this system would allow the MEC facility to restart without any power supplied from the grid. PJM periodically runs auctions for back start capability, and if selected by PJM to provide black start capability, PJM would pay a fixed

premium for this capability.[1] This black start facility, including the land required for both the permanent equipment and the construction facilities, would be a prohibited use under Duke Energy's proposed overhead easement.

2. Outage support for MEC facility.

During major planned maintenance (or during an unplanned outage of similar scope), MEC will disassemble the combustion and steam turbine for inspections and repair. This major outage work will require a substantial work force with special tools, as well as an area where the large components can be stored during the outage. This work will require space to mobilize the outage workforce and will include space to locate trailers, workshops, tented maintenance areas, warehousing, laydown area for large components, and parking. Many of these activities will require the use of a crane, which will be a prohibited use under Duke Energy's proposed overhead easement.

3. Location for expansion of MEC with a combustion turbine generator peaking power plant.

The area of NTE's property over which Duke Energy proposes to locate transmission lines is also a potential location for a combustion turbine peaking power plant. This peaking facility would include the combustion turbine, generator, and auxiliary equipment. Locating this facility within the fence line of MEC provides the ability to share common facilities such as gas pipeline and metering station, administrative and warehouse facilities, operating staff, etc., allowing this additional power plant to be a highly economical addition to the Southwest Ohio and PJM region.

[1] The Board has approved at least one amendment to allow the addition of black start capacity to a combined cycle natural gas turbine power plant, see, *In the Matter of the Application of Carroll County Energy, LC, for a Third Amendment to its Certificate to Install and Operate an Electric Generation Facility in Carroll County, Ohio* (Case No. 17-0925-EL-BGA).

4. Summary.

All of NTE's planned uses of its property relate directly to its provision of electricity for public use. This includes the ability of NTE to perform ongoing maintenance on the MEC facility, along with the ability of NTE to bring additional grid services to the MEC site. Locating Duke Energy's overhead easement in this area of NTE's property will not only preclude at least one of these uses in this particular area, it will cause a domino effect—severely limiting NTE's ability to use other areas of its property for these public purpose activities.

III. CONCLUSION

For these reasons, NTE is concerned about the impact of Duke Energy's proposed transmission line routes to the MEC facility. However, NTE and Duke are currently negotiating potential solutions to accommodate Duke Energy's proposed routes over NTE's property and is hopeful for a reasonable resolution by the end of March. NTE understands that Duke Energy has a limited window to complete tree clearing activities within areas of the proposed transmission line routes. NTE does not wish to unduly delay Duke Energy's ability to meet this timeline and is committed to working with Duke Energy and the OPSB Staff to accommodate this need.

Respectfully submitted on behalf of
NTE OHIO, LLC

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Petition for Leave to Intervene was served upon the parties of record listed below this 15th day of February 2019 *via* electronic mail.

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Summary: Comments of NTE Ohio, LLC electronically filed by Teresa Orahood on behalf of Dylan F. Borchers