Robert J. Schmidt, Jr.
rschmidt@porterwright.com

Porter Wright
Morris & Arthur LLP
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Suites 2800-3200
Columbus, Ohio 43215-6194

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PITTSBURGH
WASHINGTON, DC

April 16, 2019

Ms. Barcy F. McNeal
Docketing Division
The Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215-3793

RE: Supplemental Docketing of Exhibits
Kirby-Roberts Loop to Crissinger Project
Case No. 19-0803-EL-BLN

Dear Ms. McNeal:

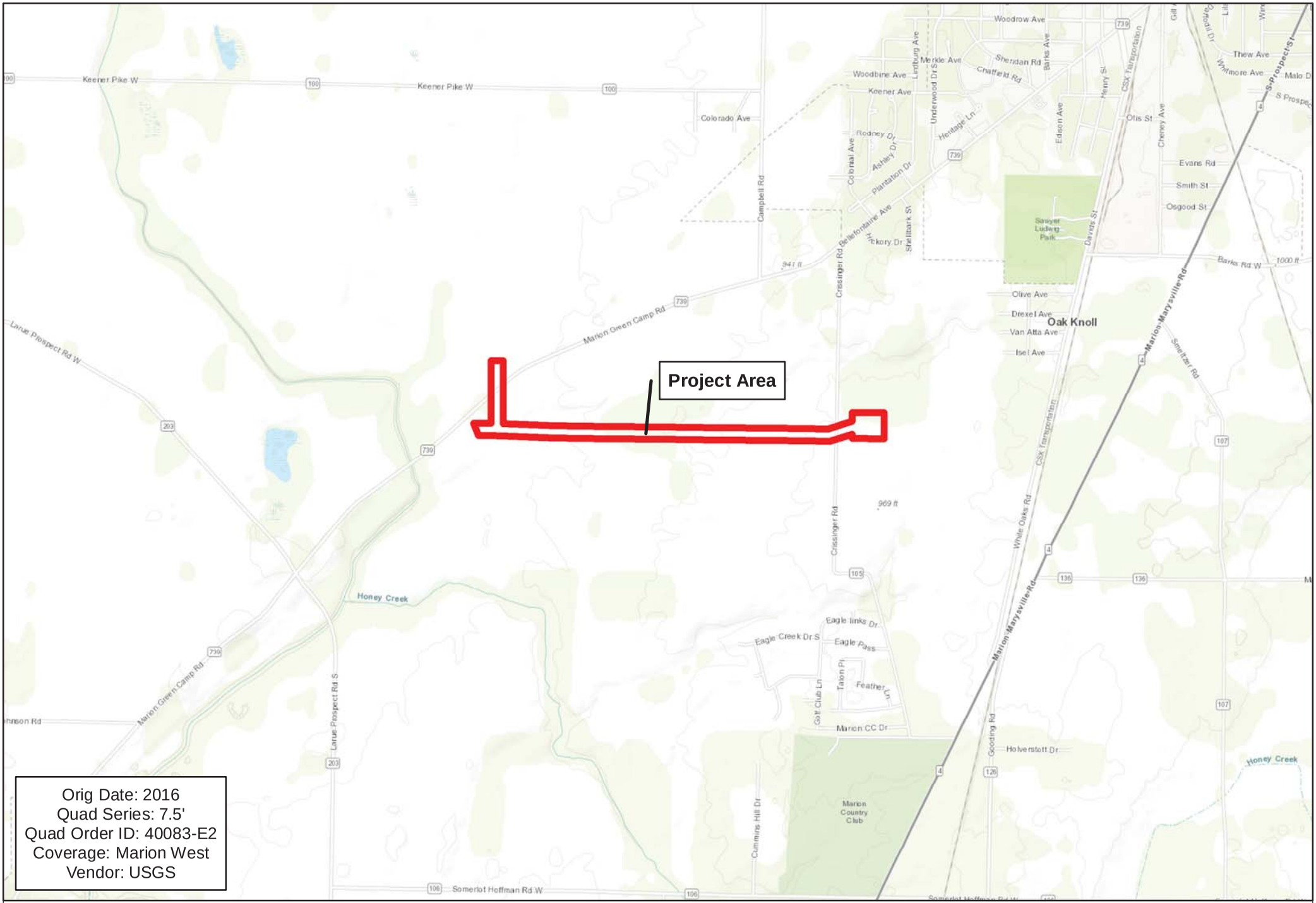
Please find enclosed copies of the Exhibits originally attempted to be filed with the Commission electronically on April 15. 2019. It appears that during the uploading process that the Exhibits were illegible and at the request of Docketing they are being refiled.

Please do not hesitate to contact me with any questions or any concerns that the documents are illegible once again.

Very truly yours,

Robert J. Schmidt, Jr.

RJS:mkd
Enclosures



Orig Date: 2016
Quad Series: 7.5'
Quad Order ID: 40083-E2
Coverage: Marion West
Vendor: USGS

Legend

Project Area

N

Crissinger-Tangy 138kV and Kirby-Roberts 138kV Project Area Exhibit 1

0 ¼ ½ ¾ 1 Miles

Map Created On: 4/5/2019

Legend

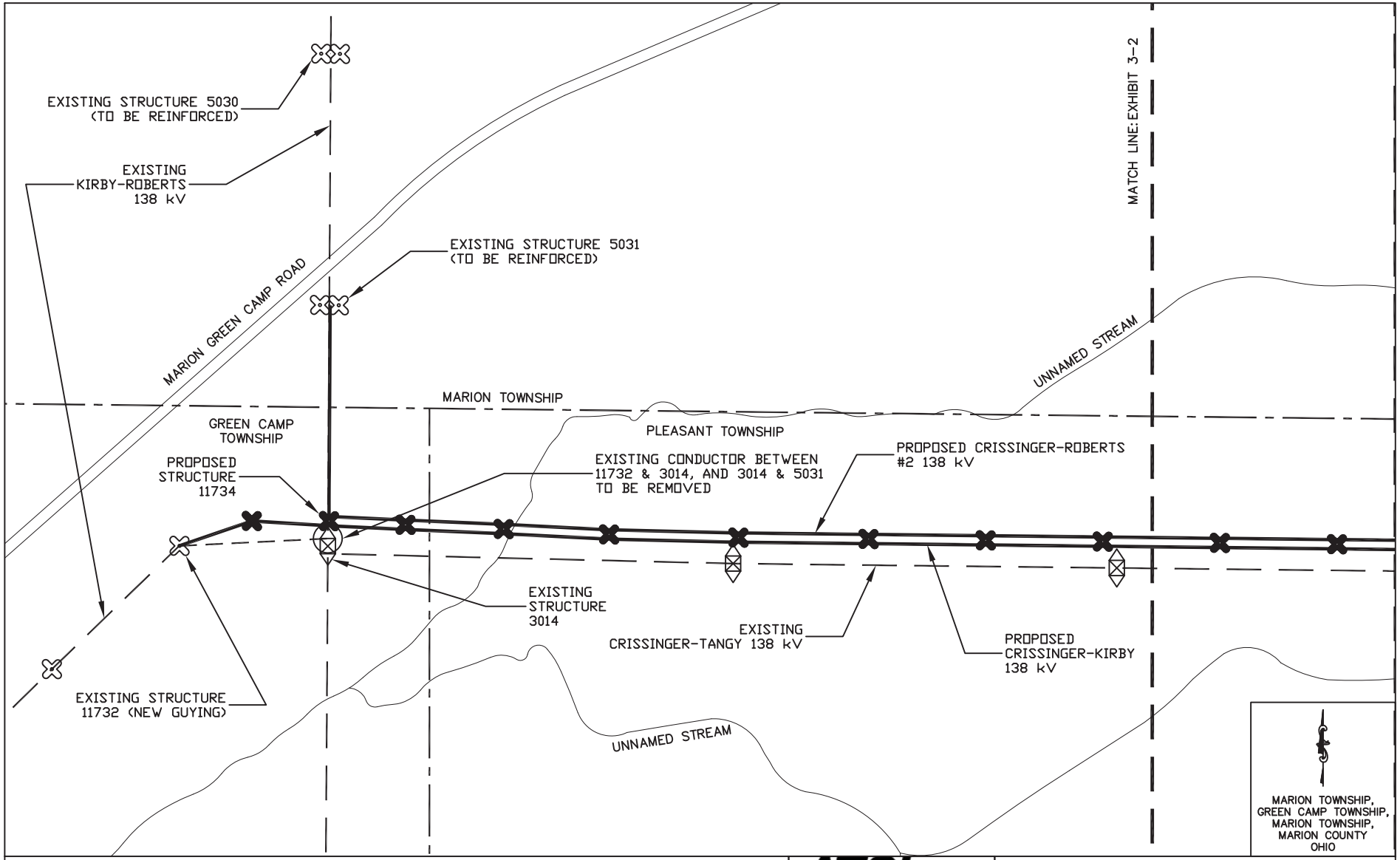
Project Area

N

Crissinger-Tangy 138kV and Kirby-Roberts 138kV Project Area
Exhibit 2

0 ¼ ½ ¾ 1 Miles

Map Created On: 4/5/2019



LEGEND

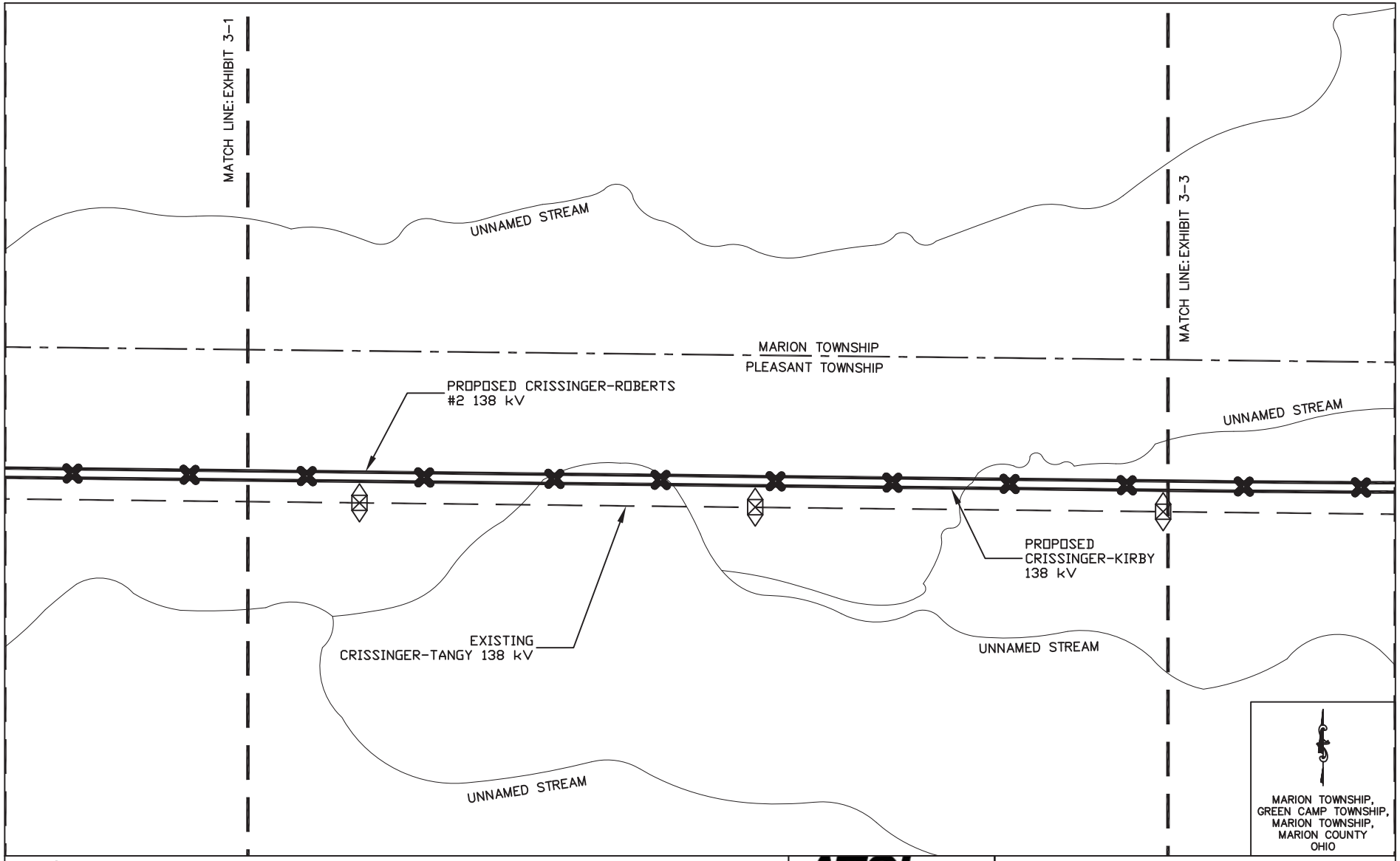
- EXISTING CONDUCTOR
- EXISTING CONDUCTOR TO BE REMOVED
- NEW CONDUCTOR
- MUNICIPAL BOUNDARY
- SUBSTATION FENCE LINE
- EXISTING STEEL LATTICE STRUCTURE
- EXISTING 2-POLE WOOD STRUCTURE
- EXISTING SINGLE POLE WOOD STRUCTURE
- NEW SINGLE POLE WOOD STRUCTURE
- NEW SINGLE POLE STEEL STRUCTURE

ATSI®
American Transmission Systems, Inc
a subsidiary of FirstEnergy Corp.

KIRBY–ROBERTS 138 kV
TRANSMISSION LINE LOOP TO
CRISSINGER SUBSTATION

GENERAL LAYOUT

EXHIBIT 3–1



LEGEND

- EXISTING CONDUCTOR
- EXISTING CONDUCTOR TO BE REMOVED
- NEW CONDUCTOR
- MUNICIPAL BOUNDARY
- SUBSTATION FENCE LINE
- EXISTING STEEL LATTICE STRUCTURE
- EXISTING 2-POLE WOOD STRUCTURE
- EXISTING SINGLE POLE WOOD STRUCTURE
- NEW SINGLE POLE WOOD STRUCTURE
- NEW SINGLE POLE STEEL STRUCTURE

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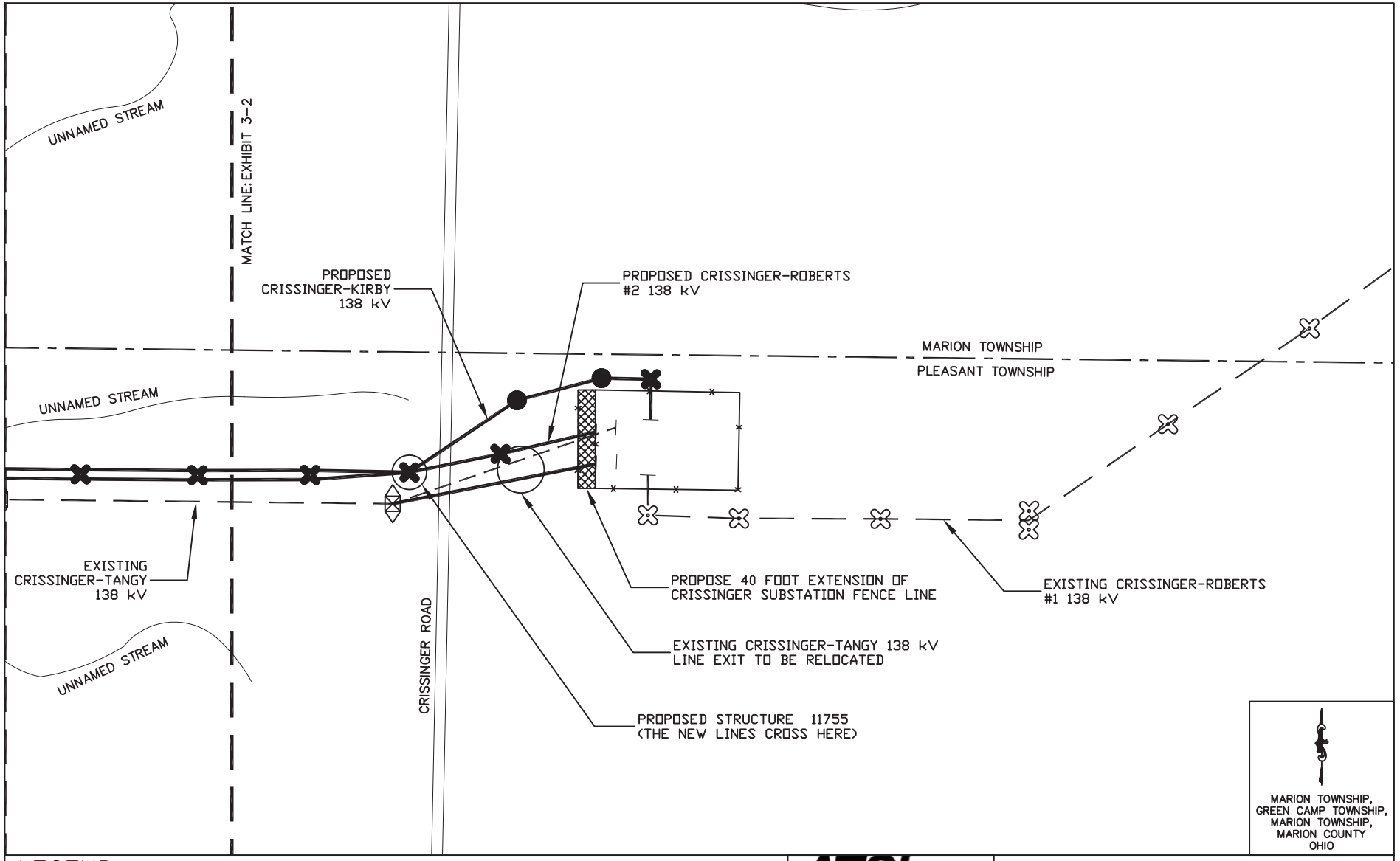
KIRBY–ROBERTS 138 kV
TRANSMISSION LINE LOOP TO
CRISSINGER SUBSTATION

GENERAL LAYOUT

EXHIBIT 3–2



LEGEND

- EXISTING CONDUCTOR
- EXISTING CONDUCTOR TO BE REMOVED
- NEW CONDUCTOR
- MUNICIPAL BOUNDARY
- SUBSTATION FENCE LINE
- EXISTING STEEL LATTICE STRUCTURE
- EXISTING 2-POLE WOOD STRUCTURE
- EXISTING SINGLE POLE WOOD STRUCTURE
- NEW SINGLE POLE WOOD STRUCTURE
- NEW SINGLE POLE STEEL STRUCTURE

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KIRBY–ROBERTS 138 kV
TRANSMISSION LINE LOOP TO
CRISSINGER SUBSTATION

GENERAL LAYOUT

EXHIBIT 3–3

EXHIBIT 4

ATSI Transmission Zone: Supplemental Crissinger 138 kV Ring Bus Expansion

Previously Presented: 8/31/2018 SRRTEP

Problem Statement (Scope and Need/Drivers):

Operational Flexibility and Efficiency

- Improve operational flexibility during maintenance and restoration efforts
- Reduce amount of potential local load loss (Approximately 99 MWs) under contingency conditions
- Mitigate non-planning criteria voltage concerns on the < 100 kV system under contingency (P6) conditions.
  - Loss of Crissinger-Roberts 138 kV and Crissinger-Tangy 138 kV Lines
  - Results in potential local voltage collapse on the 34.5 kV sub-transmission system.

Selected Solution:

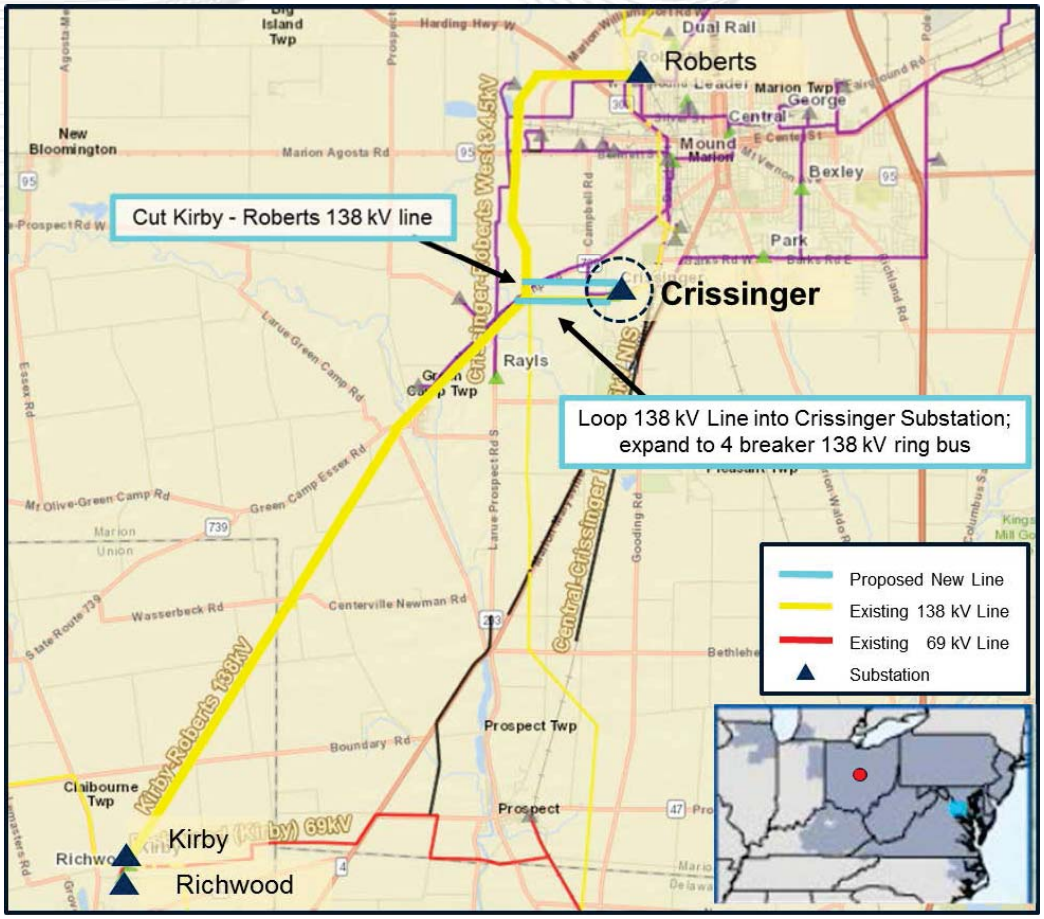
Crissinger 138 kV Ring Bus Expansion (S1696)

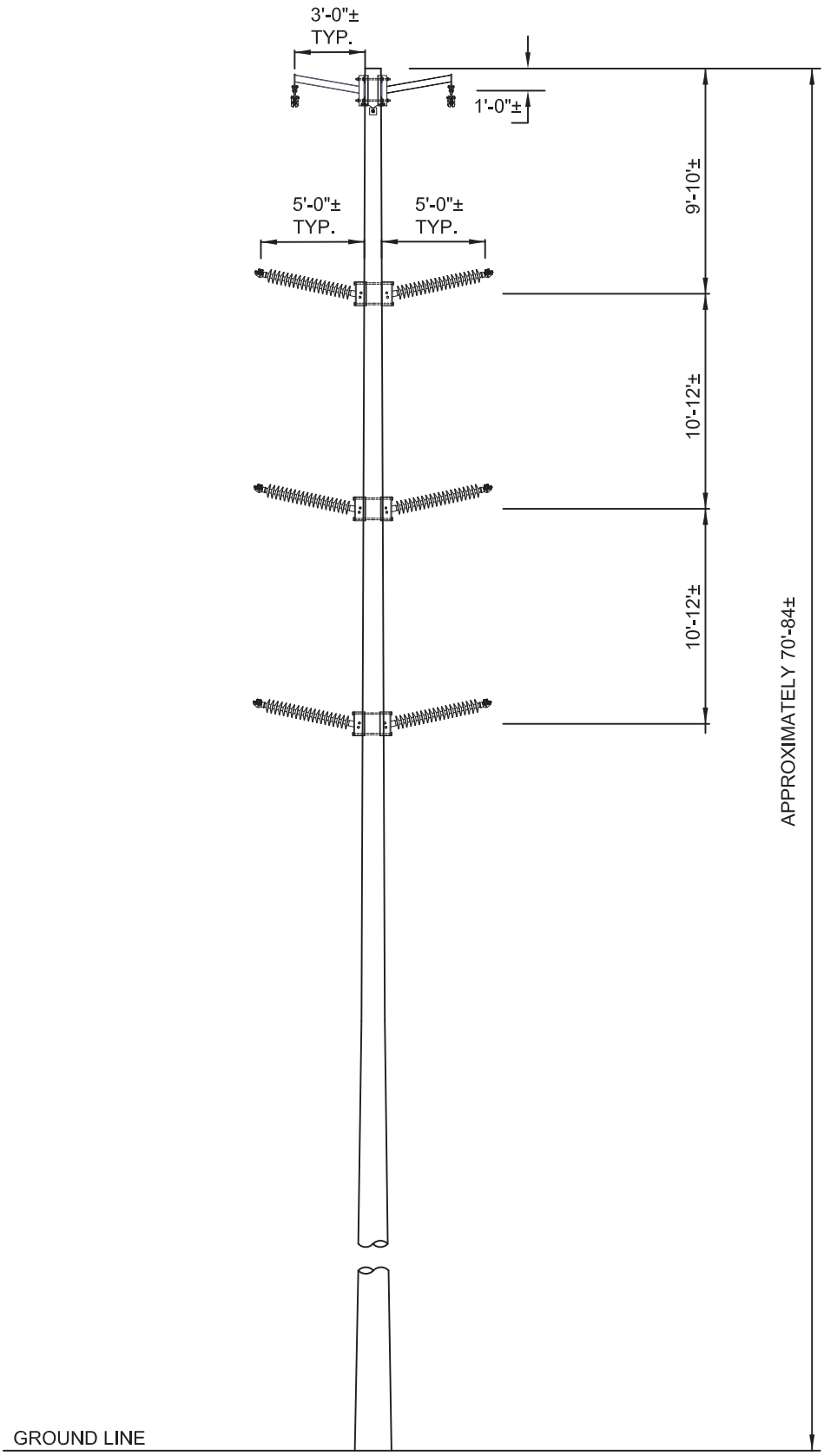
- Expand existing Crissinger substation from a four (4) breaker to a six (6) breaker 138 kV ring bus.
- Cut and extend the Kirby-Roberts 138 kV line to Crissinger substation. (Approximately 1.0 mile)
- Reconfigure Crissinger substation to include terminals for:
  Crissinger – Kirby 138 kV Line and Crissinger – Roberts #1 138 kV Line
  Crissinger – Roberts #2 138 kV Line and Crissinger – Tangy 138 kV Line

Estimated Project Cost: $5.8 M

Projected IS Date: 12/31/2019

Status: Engineering





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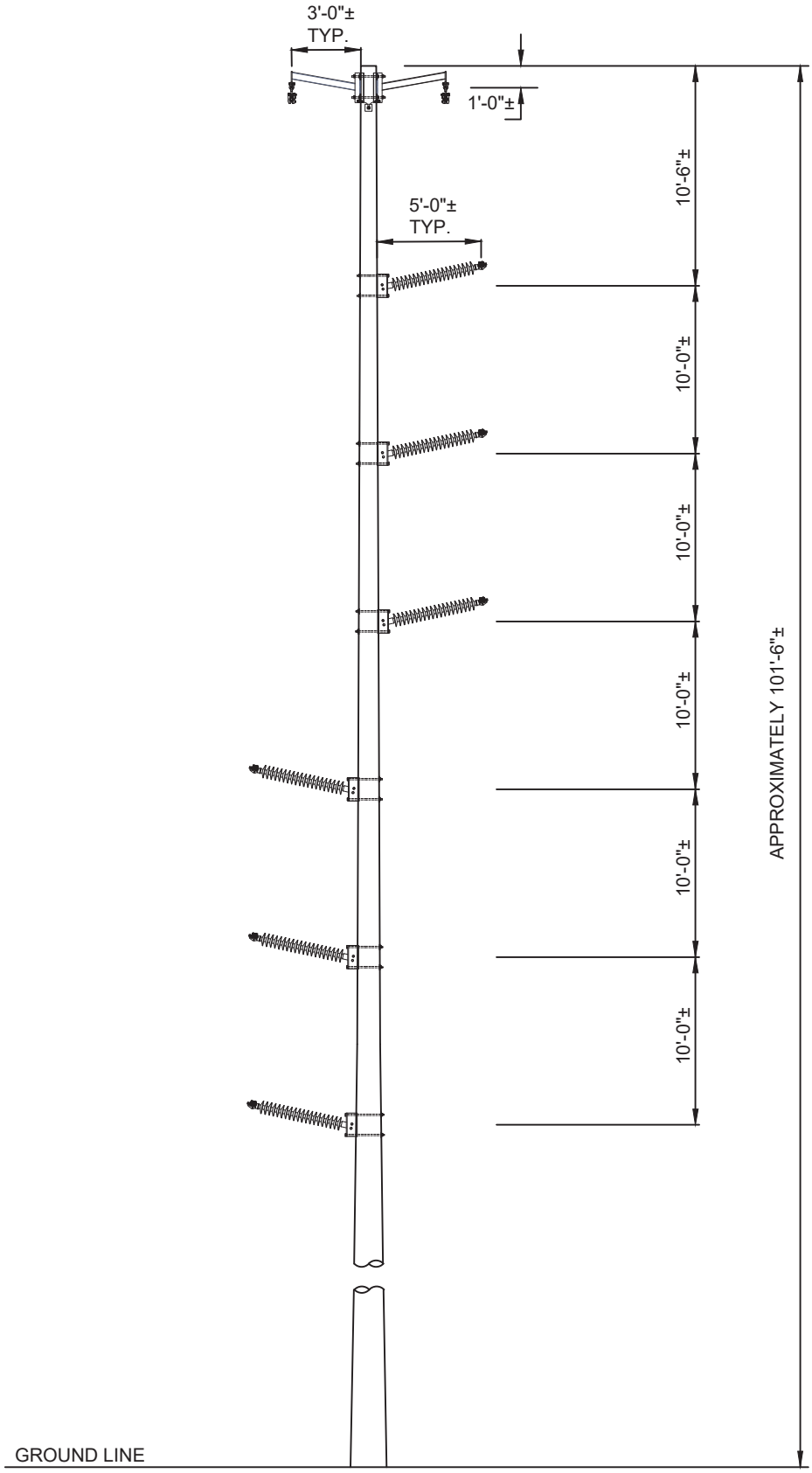
CRISSINGER–KIRBY 138kV
CRISSINGER–ROBERTS NO. 2 138kV

**NOT TO SCALE

VERTICAL DOUBLE CIRCUIT HORIZONTAL POST
WOOD POLE STRUCTURE

EXHIBIT 5

REV. B



**NOT TO SCALE

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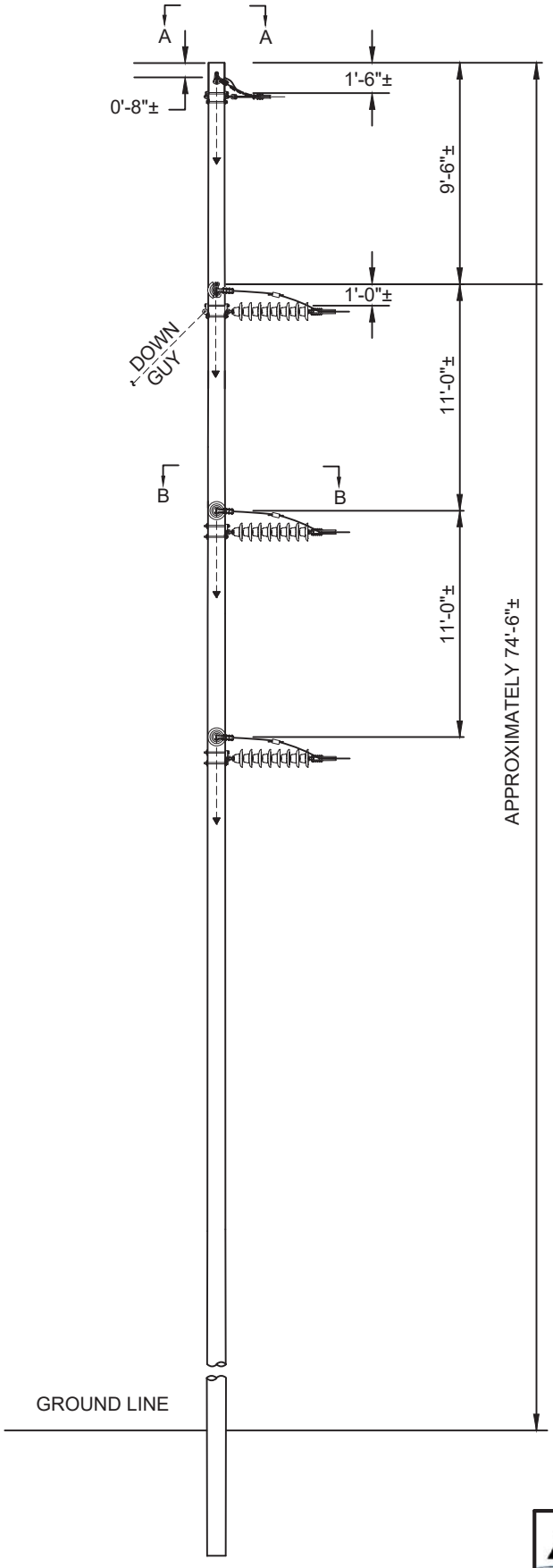
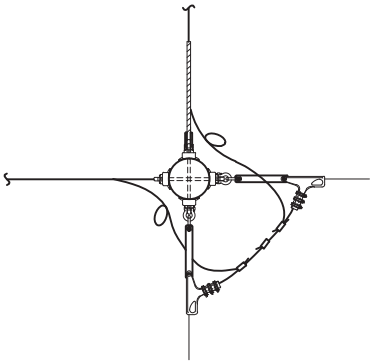
CRISSINGER–KIRBY 138kV
CRISSINGER–ROBERTS NO. 2 138kV

VERTICAL STACKED DOUBLE CIRCUIT
HORIZONTAL POST
WOOD POLE STRUCTURE

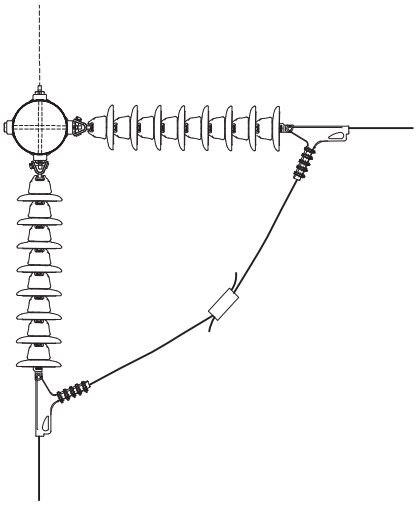
EXHIBIT 6

REV. A





SECTION A-A



SECTION B-B

**NOT TO SCALE

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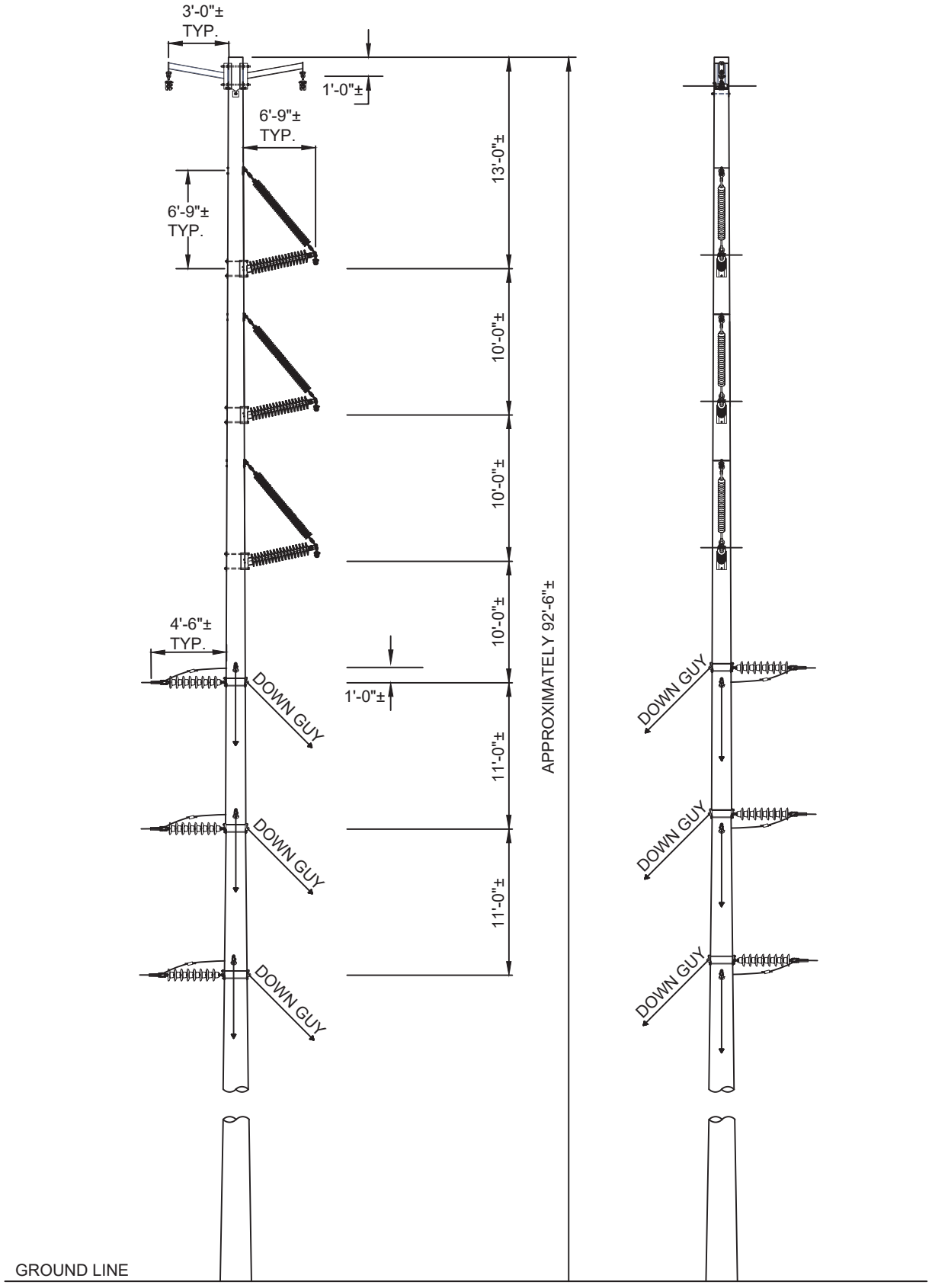
CRISSINGER–KIRBY 138kV
CRISSINGER–ROBERTS NO. 2 138kV

DEADEND VERTICAL SINGLE CIRCUIT
WOOD POLE STRUCTURE

EXHIBIT 7

REV. A



**NOT TO SCALE

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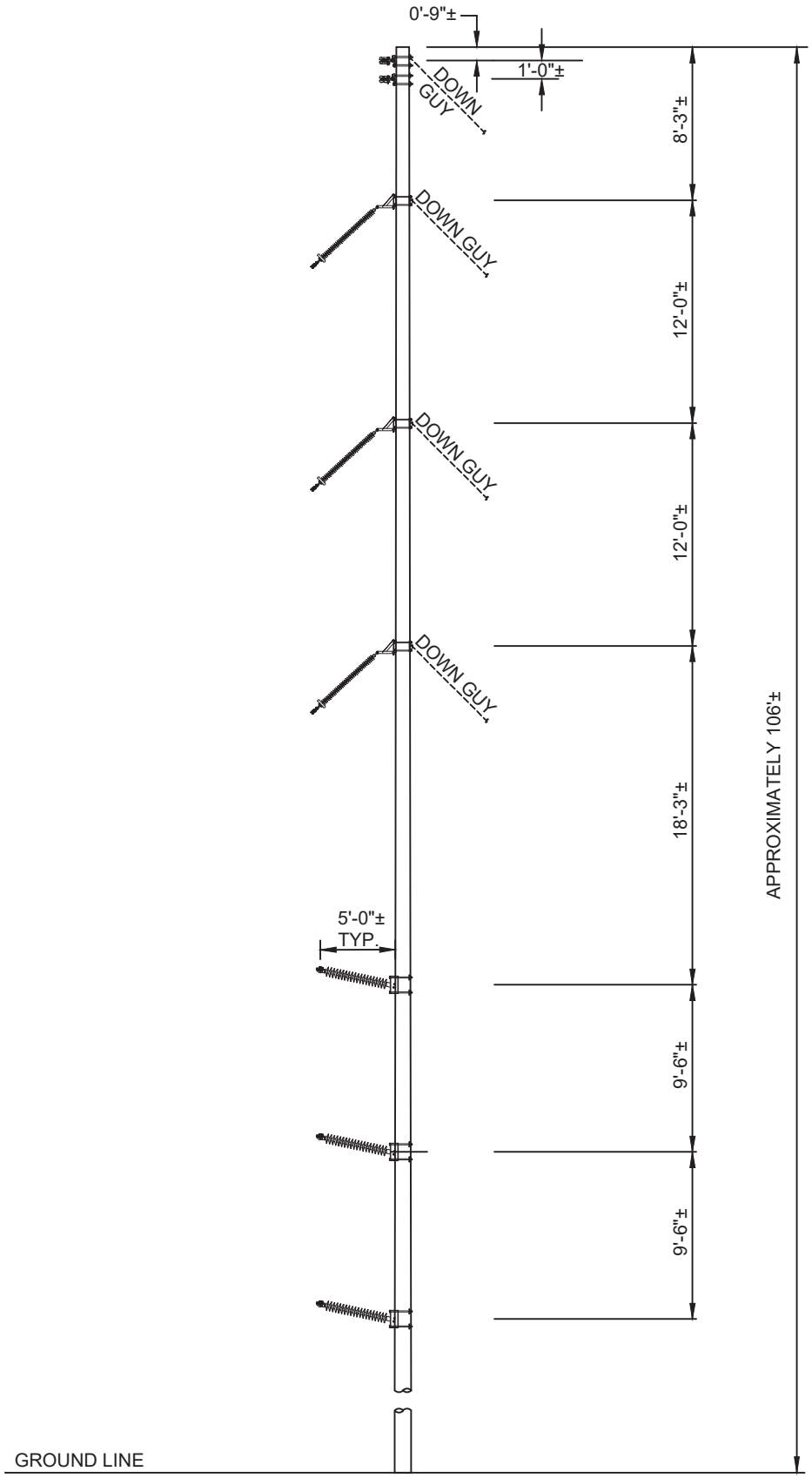
CRISSINGER–KIRBY 138kV
CRISSINGER–ROBERTS NO. 2 138kV

CUSTOM DOUBLE CIRCUIT TANGENT
WOOD POLE CROSSING STRUCTURE

EXHIBIT 8

REV. A



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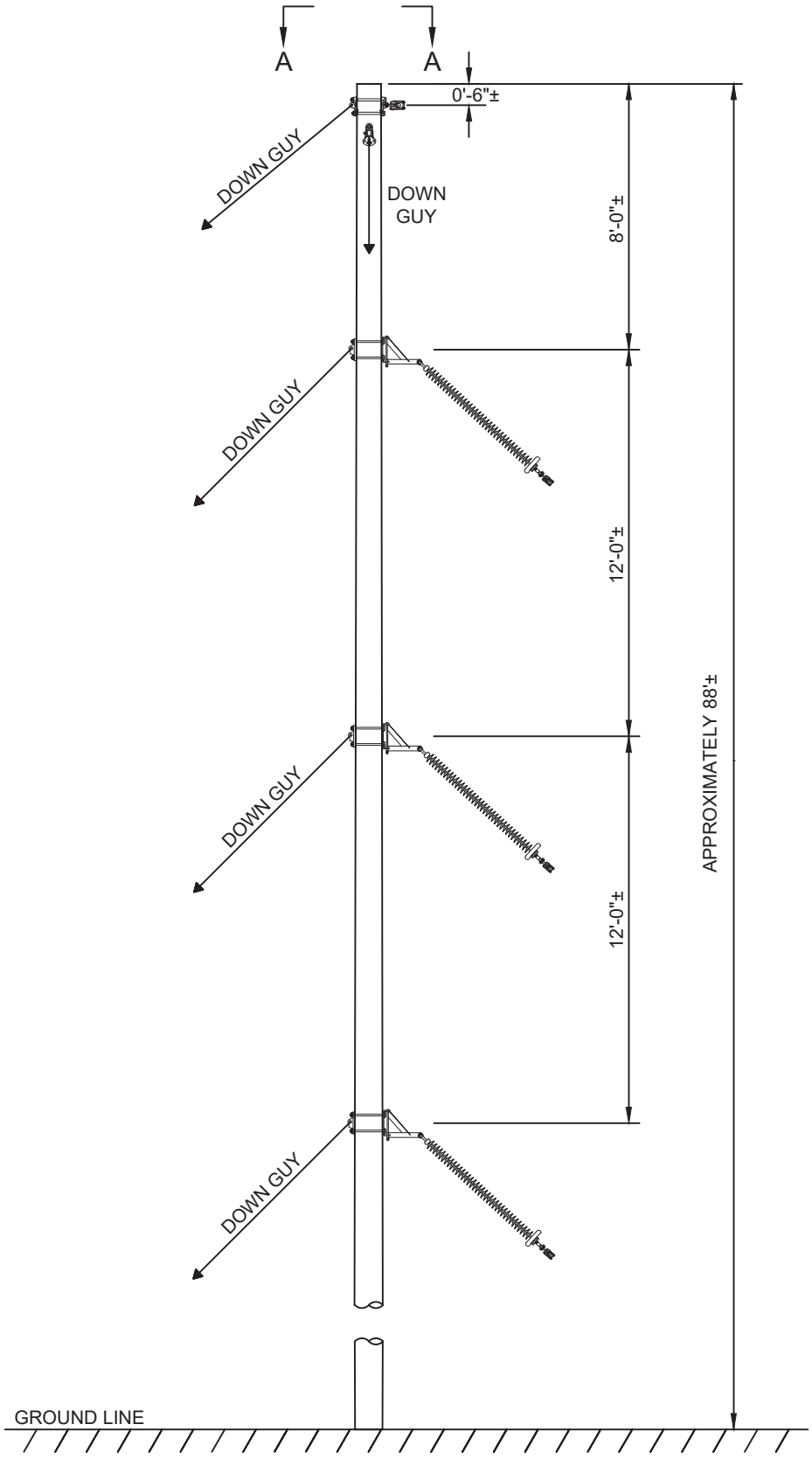
CRISSINGER–KIRBY 138kV
CRISSINGER–ROBERTS NO. 2 138kV

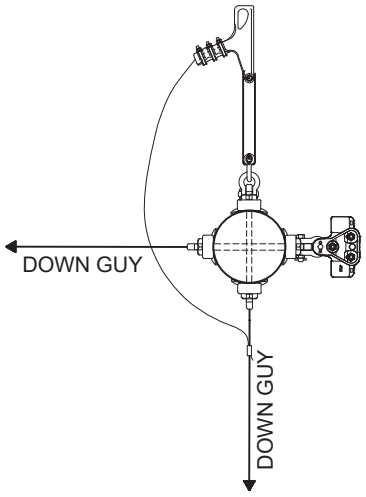
**NOT TO SCALE

CUSTOM DOUBLE CIRCUIT TANGENT
WOOD POLE CROSSING STRUCTURE

EXHIBIT 9

REV. A





SECTION A-A

**NOT TO SCALE

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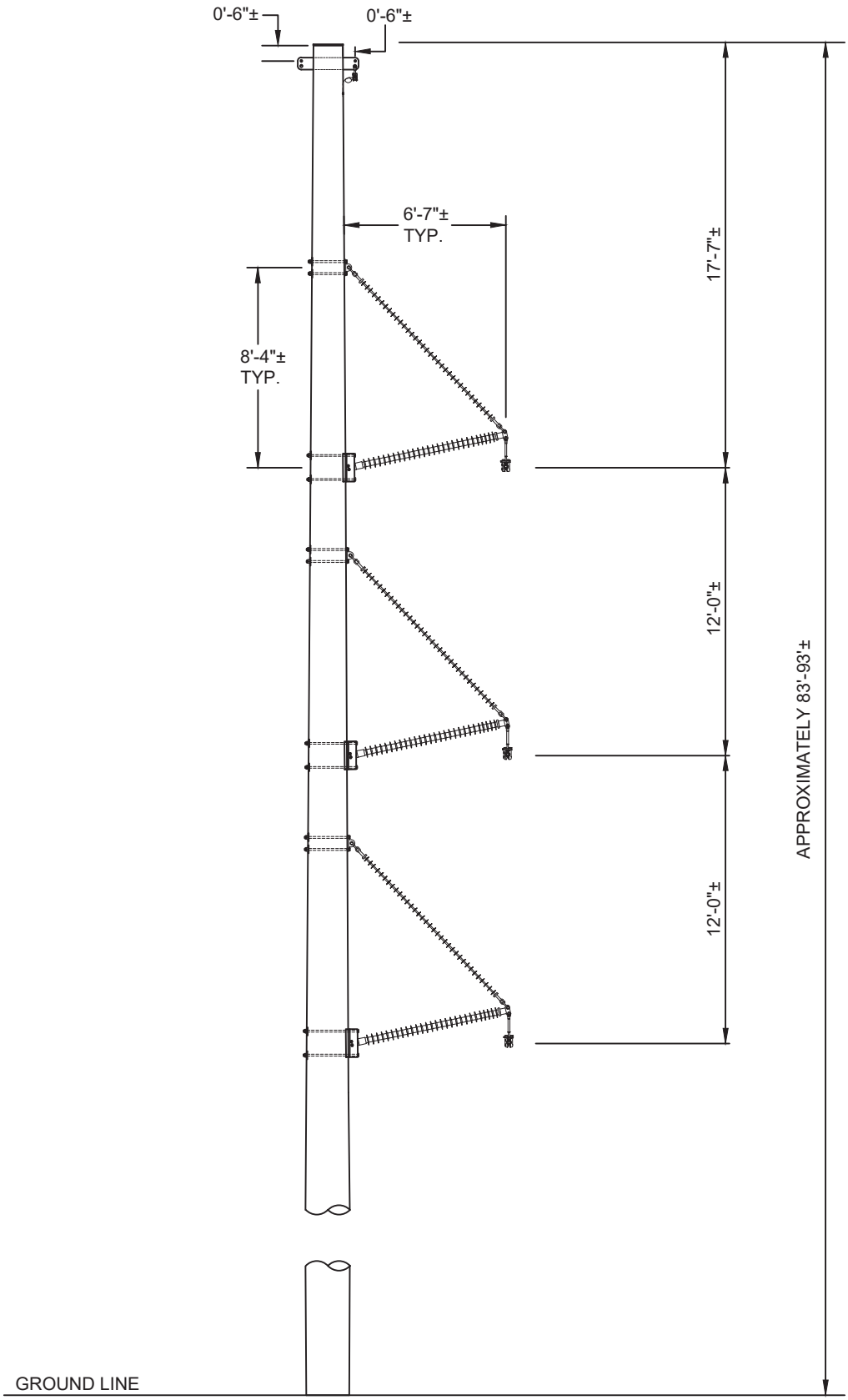
CRISSINGER–KIRBY 138kV
CRISSINGER–ROBERTS NO. 2 138kV

SINGLE CIRCUIT SUSPENSION
WOOD POLE STRUCTURE

EXHIBIT 10

REV. A



**NOT TO SCALE

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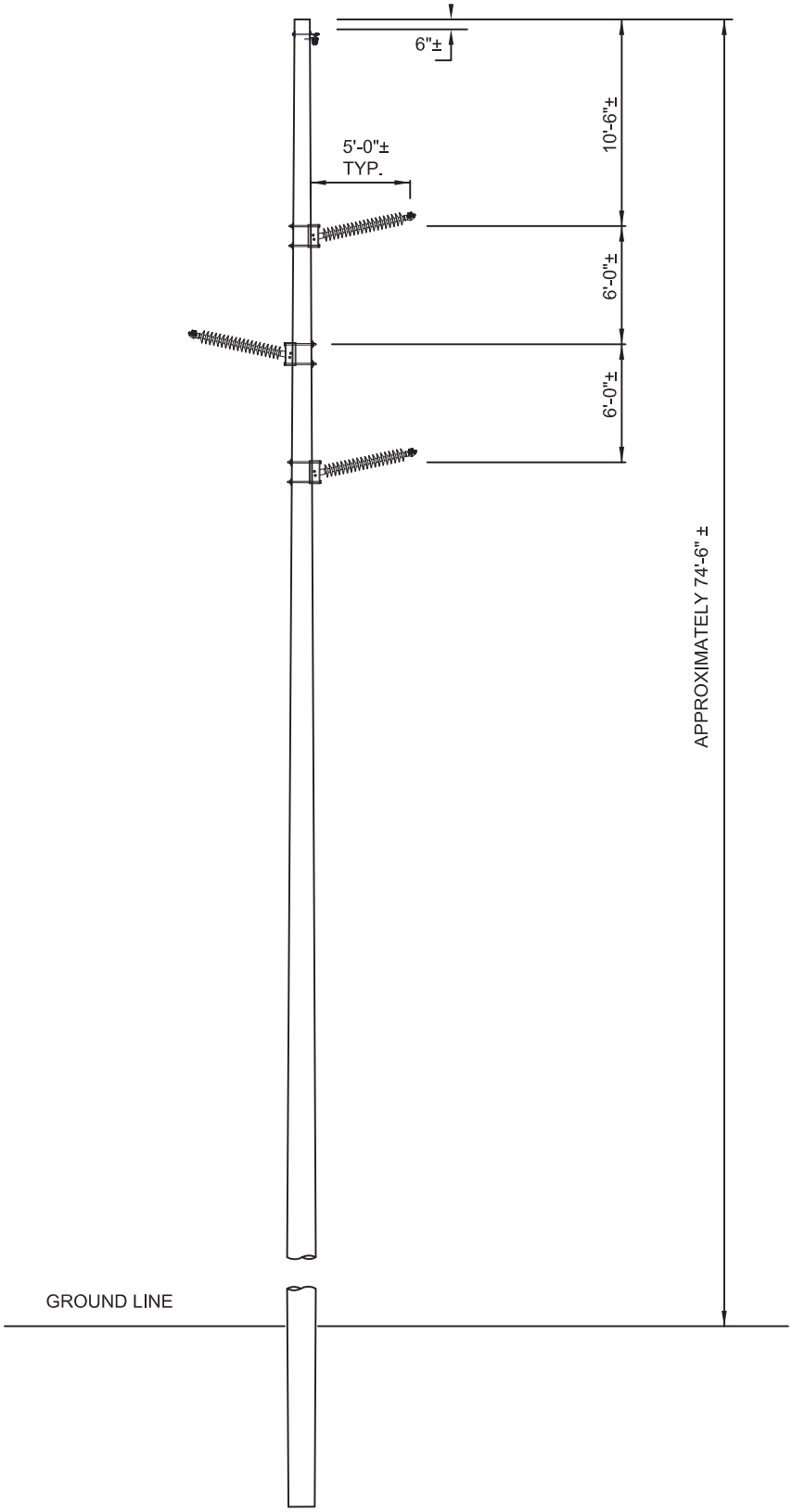
CRISSINGER–KIRBY 138kV
CRISSINGER–ROBERTS NO. 2 138kV

SINGLE CIRCUIT BRACED POST
STEEL POLE STRUCTURE

EXHIBIT 11

REV. A



**NOT TO SCALE

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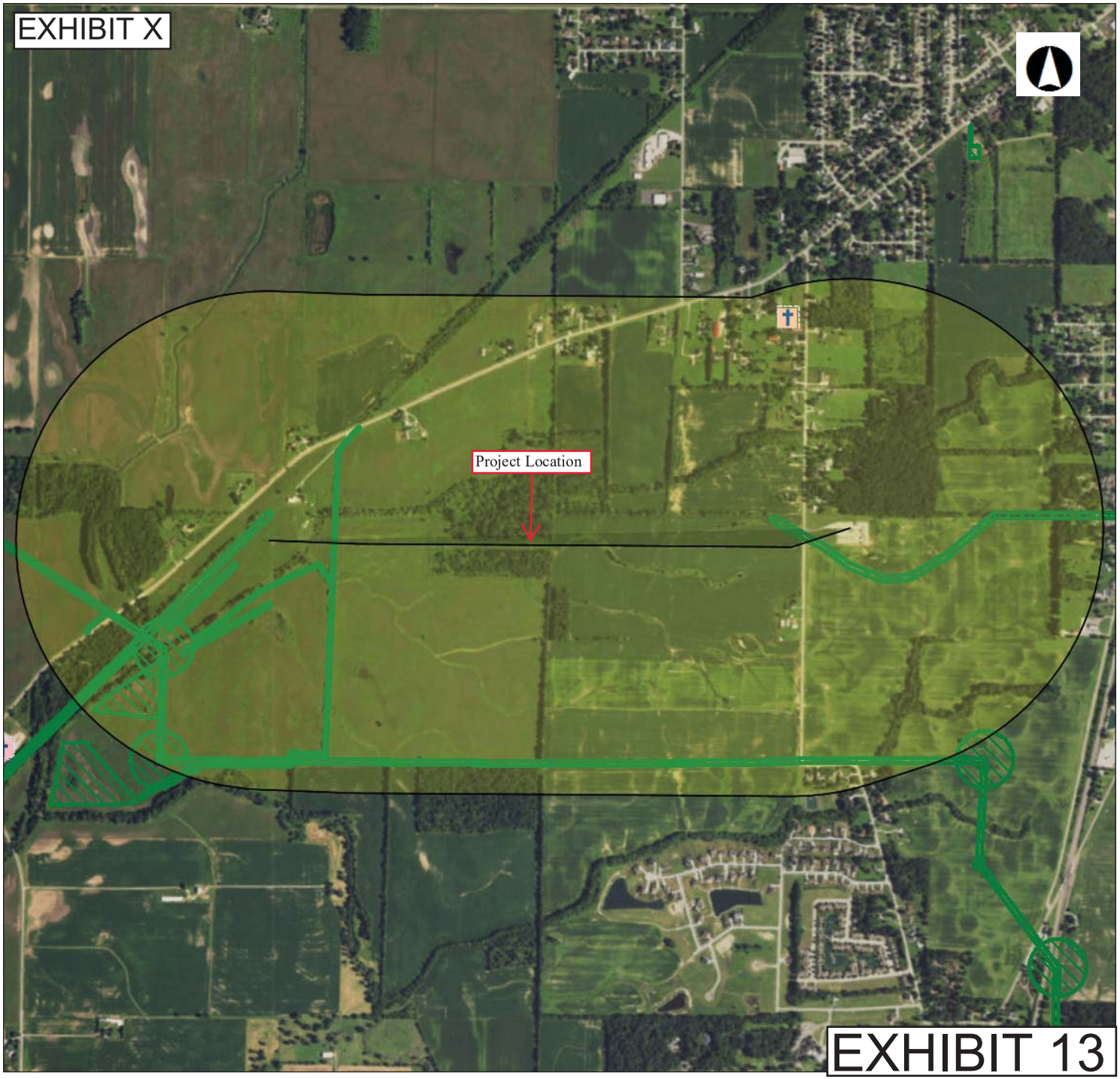
CRISSINGER–KIRBY 138kV
CRISSINGER–ROBERTS NO. 2 138kV

SINGLE CIRCUIT WOOD POLE STRUCTURE
HORIZONTAL POST DELTA SINGLE POLE

EXHIBIT 12

REV. A



OHIO HISTORY CONNECTION
State Historic Preservation Office

Legend

- NR Listings
  - Listed
  - National Historic Landmark
  - Delisted
- NR Determinations of Eligibi
- Historic Structures
- Historic Bridges
- Historic Tax Credit Projects
- OGS Cemeteries
  - Confident
  - Not Confident
- Dams
- UTM Zone Split
- NR Boundaries
- Phase1
- Phase2
- Phase3
- Historic Previously Surveyed

0 0.30 0.61 Miles

1: 24,000

Copyright/Disclaimer

Datum: [Datum]
Projection: WGS_1984_Web_Mercator_Auxiliary_Sphere

EXHIBIT 14

Ohio Department of Natural Resources

MIKE DEWINE, GOVERNOR — MARY MERTZ, DIRECTOR

Office of Real Estate
Paul R. Baldridge, Chief
2045 Morse Road – Bldg. E-2
Columbus, OH 43229
Phone: (614) 265-6649
Fax: (614) 267-4764

March 25, 2019

Brian Miller
AECOM
525 Vine Street
Cincinnati, Ohio 45202

Re: 19-165; Crissinger-Kirby 138 kV Loop and Crissinger Substation Expansion

Project: The proposed project consists of the installation of 1.1 miles of new 138 kV transmission loop line and the expansion of the Crissinger Substation.

Location: The proposed project is located in Green Camp Township, Marion County, Ohio.

The Ohio Department of Natural Resources (ODNR) has completed a review of the above referenced project. These comments were generated by an inter-disciplinary review within the Department. These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the National Environmental Policy Act, the Coastal Zone Management Act, Ohio Revised Code and other applicable laws and regulations. These comments are also based on ODNR's experience as the state natural resource management agency and do not supersede or replace the regulatory authority of any local, state or federal agency nor relieve the applicant of the obligation to comply with any local, state or federal laws or regulations.

Natural Heritage Database: The Natural Heritage Database has the following records at or within a one-mile radius of the project area:

Bald eagle (*Haliaeetus leucocephalus*), Federal species of concern
Big Island Wildlife Area – ODNR Division of Wildlife
Trella Romine Prairie – Appalachia Ohio Alliance

The review was performed on the project area you specified in your request as well as an additional one-mile radius. Records searched date from 1980. This information is provided to inform you of features present within your project area and vicinity.

Please note that Ohio has not been completely surveyed and we rely on receiving information from many sources. Therefore, a lack of records for any particular area is not a statement that rare species or unique features are absent from that area. Although all types of plant communities have been surveyed, we only maintain records on the highest quality areas.

EXHIBIT 14

Fish and Wildlife: The Division of Wildlife (DOW) has the following comments.

The DOW recommends that impacts to streams, wetlands and other water resources be avoided and minimized to the fullest extent possible, and that best management practices be utilized to minimize erosion and sedimentation.

The project is within the range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species. The following species of trees have relatively high value as potential Indiana bat roost trees to include: shagbark hickory (*Carya ovata*), shellbark hickory (*Carya laciniosa*), bitternut hickory (*Carya cordiformis*), black ash (*Fraxinus nigra*), green ash (*Fraxinus pennsylvanica*), white ash (*Fraxinus americana*), shingle oak (*Quercus imbricaria*), northern red oak (*Quercus rubra*), slippery elm (*Ulmus rubra*), American elm (*Ulmus americana*), eastern cottonwood (*Populus deltoides*), silver maple (*Acer saccharinum*), sassafras (*Sassafras albidum*), post oak (*Quercus stellata*), and white oak (*Quercus alba*). Indiana bat roost trees consists of trees that include dead and dying trees with exfoliating bark, crevices, or cavities in upland areas or riparian corridors and living trees with exfoliating bark, cavities, or hollow areas formed from broken branches or tops. However, Indiana bats are also dependent on the forest structure surrounding roost trees. If suitable habitat occurs within the project area, the DOW recommends trees be conserved. If suitable habitat occurs within the project area and trees must be cut, the DOW recommends cutting occur between October 1 and March 31. If suitable trees must be cut during the summer months, the DOW recommends a net survey be conducted between June 1 and August 15, prior to any cutting. Net surveys should incorporate either nine net nights per square 0.5 kilometer of project area, or four net nights per kilometer for linear projects. If no tree removal is proposed, this project is not likely to impact this species.

The DOW recommends no in-water work in perennial streams from April 15 to June 30 to reduce impacts to indigenous aquatic species and their habitat. If no in-water work is proposed in a perennial stream, this project is not likely to impact these or other aquatic species.

The project is within the range of the clubshell (*Pleurobema clava*), a state endangered and federally endangered mussel, the rayed bean (*Villosa fabalis*), a state endangered and federally endangered mussel, the snuffbox (*Epioblasma triquetra*), a state endangered and federally endangered mussel, the rabbitsfoot (*Quadrula cylindrica cylindrica*), a state endangered and federal candidate mussel, and the pondhorn (*Uniomerus tetralasmus*), a state threatened mussel. Due to the location, and that there is no in-water work proposed in a stream of sufficient size, this project is not likely to impact these species.

The project is within the range of the eastern massasauga (*Sistrurus catenatus*), a state endangered and federally threatened snake species. The eastern massasauga uses a range of habitats including wet prairies, fens, and other wetlands, as well as drier upland habitat. Due to the location, the type of habitat present at the project site and within the vicinity of the project area, this project is not likely to impact this species.

The project is within the range of the American bittern (*Botaurus lentiginosus*), a state endangered bird. Nesting bitterns prefer large undisturbed wetlands that have scattered small pools amongst dense vegetation. They occasionally occupy bogs, large wet meadows, and dense shrubby swamps. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 1 to July 31. If this type of habitat will not be impacted, this project is not likely to impact this species.

EXHIBIT 14

The project is within the range of the king rail (*Rallus elegans*), a state endangered bird. Nests for this species are deep bowls constructed out of grass and usually hidden very well in marsh vegetation. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 1 to August 1. If no wetland habitat will be impacted, the project is not likely to impact this species.

Due to the potential of impacts to federally listed species, as well as to state listed species, we recommend that this project be coordinated with the U.S. Fish & Wildlife Service.

Water Resources: The Division of Water Resources has the following comment.

The local floodplain administrator should be contacted concerning the possible need for any floodplain permits or approvals for this project. Your local floodplain administrator contact information can be found at the website below.

http://water.ohiodnr.gov/portals/soilwater/pdf/floodplain/Floodplain%20Manager%20Community%20Contact%20List_8_16.pdf

ODNR appreciates the opportunity to provide these comments. Please contact Sarah Tebbe, Environmental Specialist, at (614) 265-6397 or Sarah.Tebbe@dnr.state.oh.us if you have questions about these comments or need additional information.

John Kessler
Environmental Services Administrator

EXHIBIT 15

Ruggiero, Augustine (Henslee, Dianna L)

Subject: Crissinger-Kirby 138 kV Loop and Crissinger Substation Expansion, Marion County

From: susan_zimmermann@fws.gov [mailto:susan_zimmermann@fws.gov] **On Behalf Of** Ohio, FW3
Sent: Friday, March 01, 2019 8:52 AM
To: Miller, Brian
Cc: nathan.reardon@dnr.state.oh.us; kate.parsons@dnr.state.oh.us
Subject: Crissinger-Kirby 138 kV Loop and Crissinger Substation Expansion, Marion County

UNITED STATES DEPARTMENT OF THE INTERIOR
U.S. Fish and Wildlife Service
Ecological Services Office
4625 Morse Road, Suite 104
Columbus, Ohio 43230
(614) 416-8993 / Fax (614) 416-8994

TAILS# 03E15000-2019-TA-0758

Dear Mr. Miller,

We have received your recent correspondence requesting information about the subject proposal. There are no federal wilderness areas, wildlife refuges or designated critical habitat within the vicinity of the project area. The following comments and recommendations will assist you in fulfilling the requirements for consultation under section 7 of the Endangered Species Act of 1973, as amended (ESA).

The U.S. Fish and Wildlife Service (Service) recommends that proposed developments avoid and minimize water quality impacts and impacts to high quality fish and wildlife habitat (e.g., forests, streams, wetlands). Additionally, natural buffers around streams and wetlands should be preserved to enhance beneficial functions. If streams or wetlands will be impacted, the Corps of Engineers should be contacted to determine whether a Clean Water Act section 404 permit is required. Best management practices should be used to minimize erosion, especially on slopes. All disturbed areas should be mulched and revegetated with native plant species. Prevention of non-native, invasive plant establishment is critical in maintaining high quality habitats.

FEDERALLY LISTED SPECIES COMMENTS: All projects in the State of Ohio lie within the range of the federally endangered **Indiana bat** *(Myotis sodalis*) and the federally threatened **northern long-eared bat** (*Myotis septentrionalis*). In Ohio, presence of the Indiana bat and northern long-eared bat is assumed wherever suitable habitat occurs unless a presence/absence survey has been performed to document absence. Suitable summer habitat for Indiana bats and northern long-eared bats consists of a wide variety of forested/wooded habitats where they roost, forage, and travel and may also include some adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, old fields and pastures. This includes forests and woodlots containing potential roosts (i.e., live trees and/or snags ≥3 inches diameter at breast height (dbh) that have any exfoliating bark, cracks, crevices, hollows and/or cavities), as well as linear features such as fencerows, riparian forests, and other wooded corridors. These wooded areas may be dense or loose aggregates of trees with variable amounts of canopy closure. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet (305 meters) of other forested/wooded habitat. Northern long-eared bats have also been observed roosting in human-made structures, such as buildings, barns, bridges, and bat houses; therefore, these structures should also be considered potential summer habitat. In the winter, Indiana bats and northern long-eared bats hibernate in caves and abandoned mines.

EXHIBIT 15

Due to your proposal to conduct summer clearing, **we recommend that a summer survey be conducted to determine presence or probable absence of Indiana bats at the project site.** The summer survey must be conducted by an approved surveyor (list attached) and be designed and conducted in coordination with the Endangered Species Coordinator for this office. In Ohio, summer mist net surveys must be conducted between June 1 and August 15. We recommend that any Indiana bats and northern long-eared bats captured, especially reproductively active females and juveniles, be monitored through radio-tracking to determine roost locations.

If any caves or abandoned mines may be disturbed, further coordination with this office is requested to determine if fall or spring portal surveys are also warranted. Portal surveys must be conducted by an approved surveyor and be designed and conducted in coordination with the Endangered Species Coordinator for this office.

Survey results should be coordinated with this office prior to initiation of any work. Based on the results of the survey(s), we will evaluate potential impacts to the Indiana bat from the proposed project. If a summer survey documents probable absence of Indiana bats, the 4(d) rule for the northern long-eared bat could be applied (see http://www.fws.gov/midwest/endangered/mammals/nleb/index.html).

If there is a federal nexus for the project (e.g., federal funding provided, federal permits required to construct), no tree clearing should occur on any portion of the project area until consultation under section 7 of the ESA, between the Service and the federal action agency, is completed. We recommend that the federal action agency submit a determination of effects to this office, relative to the Indiana bat and northern long-eared bat, for our review and concurrence.

Due to the project type, size, and location, we do not anticipate adverse effects to any other federally endangered, threatened, proposed, or candidate species. Should the project design change, or during the term of this action, additional information on listed or proposed species or their critical habitat become available, or if new information reveals effects of the action that were not previously considered, consultation with the Service should be initiated to assess any potential impacts.

These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the ESA, and are consistent with the intent of the National Environmental Policy Act of 1969 and the Service's Mitigation Policy. This letter provides technical assistance only and does not serve as a completed section 7 consultation document. We recommend that the project be coordinated with the Ohio Department of Natural Resources due to the potential for the project to affect state listed species and/or state lands. Contact John Kessler, Environmental Services Administrator, at (614) 265-6621 or at john.kessler@dnr.state.oh.us.

If you have questions, or if we can be of further assistance in this matter, please contact our office at (614) 416-8993 or ohio@fws.gov.

Sincerely,

Patrice M. Ashfield
Field Office Supervisor

cc: Nathan Reardon, ODNR-DOW
Kate Parsons, ODNR-DOW

EXHIBIT 15

Attachment: Surveyors List

Summary: Application for a Certificate of Environmental Compatibility and Public Need -- Resubmittal of Exhibits electronically filed by Mr. Robert J Schmidt on behalf of American Transmission Systems Inc.