

BEFORE THE POWER SITING BOARD OF THE STATE OF OHIO

**In the Matter of the Letter of Notification Application)
of AEP Ohio Transmission Company for a Certificate)
of Environmental Compatibility and Public Need for) Case No. 19-1781-EL-BLN
the East Lima-Maddox Creek 345 kV Transmission)
Line Reconductoring 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 January 2, 2020, 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 January 2, 2020, which is the recommended automatic approval date.

Sincerely,



Raymond W. Strom
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OPSB STAFF REPORT OF INVESTIGATION

Case Number: 19-1781-EL-BLN
Project Name: East Lima-Maddox Creek 345 kV Transmission Line Reconductoring Project
Project Location: Allen, Putnam, and Van Wert counties
Applicant: AEP Ohio Transmission Company
Application Filing Date: October 2, 2019
Filing Type: Letter of Notification
Inspection Date: December 18, 2019
Report Date: December 20, 2019
Recommended Automatic Approval Date: January 2, 2020
Applicant's Waiver Requests: none
Staff Assigned: J. Pawley, R. Holderbaum, F. Butt, A. Conway

Summary of Staff Recommendations (see discussion below):

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

Project Description and Need

This application is a request to reconductor the East Lima-Maddox Creek 345 kilovolt (kV) transmission line between the East Lima Station and the Maddox Creek Station. The reconductoring would occur for approximately 30 miles along the existing East Lima-Sorenson 345 kV transmission line in Allen, Putnam and Van Wert counties.

In addition to the line reconductoring, three existing structures would be replaced, and one new structure would be added to support the reconducted line. AEP Ohio Transmission Company (Applicant) states that the reconductoring would occur via helicopter.

The proposed reconductoring is a baseline project which is necessary to resolve a reliability criteria violation along the East Lima-Maddox Creek 345 kV circuit. In PJM's 2016 and 2017 Winter Generation Deliverability analysis, the East Lima-Maddox Creek 345 kV circuit was found to be overloaded beyond its capability for the single contingency loss of the Marysville-Sorenson 765 kV circuit during winter conditions. The Applicant states that reconductoring the line is the most cost-effective long-term solution. The PJM identification numbers applicable to this project are b2833 and b2969. Construction on the project is expected to begin in the first quarter of 2020 with an in-service date of November 2021, and a cost of approximately \$37 million.

Nature of Impacts

Land Use

The Applicant has stated that the reconductoring would occur via the use of helicopter. This installation method would greatly reduce land use impacts. Existing lattice tower structures would continue to be used, with the exception of three towers which would be replaced with steel monopoles. Additionally, one new steel monopole would be installed at the East Lima station for clearance purposes. No new right-of-way would be required for this monopole.

Potential ground disturbing impacts between the two substations would be confined to pads for helicopter takeoff and landing (helipads), and storage areas for equipment, and would be temporary in nature. There would be 15 helipads, spaced approximately 2 miles apart. These pads would serve as landing and takeoff areas for the helicopter, and for storage of the conductor spools. The helipads would predominately be located within 200 feet from the edge of existing right-of-way. The right-of-way for this line is 150 feet wide. The Applicant would access the tower locations to manually pull the new conductor with light vehicles, so impacts to agricultural land would be minimal. The helicopter route for the reconductoring would be along the existing right-of-way from the helipad locations, so the helicopters would not be flying over heavily populated areas, but rather in close proximity to the existing right-of-way.

Residential aesthetic impacts of the new line are expected to be similar as present conditions, as the nature of this project would be to reductor an existing transmission line. Higher density residential development is located in closer proximity to the East Lima and Maddux Creek substations, with rural residential density located between the substation locations. These residences would likely experience temporary disturbances from helicopter use and line stringing. Approximately 28 miles of the 30-mile project is presently agricultural land use. One golf course would be crossed by the project. There are no churches, schools, parks, preserves or wildlife areas located within 1,000 feet of the project.

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. The consultant determined that the project would not involve or impact any significant cultural resources or 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).

Aviation

Staff contacted the Ohio Department of Transportation Office of Aviation (ODOT-OA) during the review of this application in order to coordinate review of potential impacts of the project. ODOT-OA advised that there are no ODOT-OA licensing requirements for the helicopter operations. ODOT-OA also advised that the Applicant is required to register the helipads with ODOT-OA by filling out *Application for Landing Site* (Form 5501.1) and Federal Aviation Administration (FAA) form 7480-1FAA Form 7480-1 (Notice for Construction, Alteration and Deactivation of Airports). Staff recommends that the Applicant confirm that these forms have been submitted by the aviation contractor prior to construction.

Surface Waters

The proposed project area contains four ephemeral streams and one Category 1 wetland. All five resources would be aerially spanned by the project and the new structures would be installed outside of stream and wetland boundaries. The Applicant states that they will file a Notice of Intent with the Ohio Environmental Protection Agency for authorization of construction stormwater discharges under General Permit (OHCD000005). The Applicant informed Staff that they will have all necessary permits in place and docket any necessary permits in the case docket prior to the start of construction.

Threatened and Endangered Species

The Applicant coordinated with Ohio Department of Natural Resources (ODNR) and the U.S. Fish and Wildlife Service (USFWS) to minimize and eliminate potential impacts to state and federal listed species and/or suitable habitat that may be found in the project area.

The project area is within the range of the 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 may be impacted by the project. In order to avoid impacts to the Indiana bat and the northern long-eared bat, the ODNR, the USFWS, and Staff recommend the Applicant adhere to seasonal tree cutting dates of October 1 through March 31 for removal of any trees greater than or equal to three inches in diameter.

The project lies within the range of several federal and state listed mussel and fish species. Due to no in-water work proposed in perennial streams, the type of habitat present along the project route and within the vicinity of the project area, no impacts to these species are anticipated.

The project lies within the range of the state endangered upland sandpiper (*Bartramia longicauda*), and the state endangered northern harrier (*Circus cyaneus*). The ODNR states that if suitable habitat exists for these species and the habitat cannot be avoided, then construction should be avoided in the species habitats during the species nesting periods. The Applicant informed Staff that suitable habitat for the upland sandpiper does not exist within the project area. The Applicant would avoid suitable habitat for the northern harrier during the species nesting period of May 15 to August 1 during construction in order to avoid impacts to the species.

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 application on January 2, 2020, provided that the following condition is satisfied. Staff notes that its recommendation for approval of this application should not be construed as a recommendation for approval of cost recovery in any ratemaking proceeding.

Condition:

- (1) Prior to construction in areas that require permits, the Applicant shall obtain and comply with all applicable permits and authorizations as required by federal and state entities. Copies of such permits and authorizations, including all supporting documentation, shall be provided to Staff to ensure compliance with this condition. Specifically, for the helipads the Applicant shall confirm that it or its aviation contractor has submitted Form 7480-1 to

the Federal Aviation Administration and *Application for Landing Site* with the Ohio Department of Transportation Office of Aviation.

This foregoing document was electronically filed with the Public Utilities

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in

Case No(s). 19-1781-EL-BLN

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