

BEFORE THE POWER SITING BOARD OF THE STATE OF OHIO

**In the Matter of the Letter of Notification Application by)
American Transmission Systems, Incorporated for a)
Certificate of Environmental Compatibility and Public) Case No. 19-1765-EL-BLN
Need for the Napoleon-Richland-Stryker 138 kV)
Transmission Line Open Arm 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.

Staff recommends approval of the application.

Sincerely,



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OPSB STAFF REPORT OF INVESTIGATION

Case Number: 19-1765-EL-BLN
Project Name: Napoleon-Richland-Stryker 138 kV
Transmission Line Open Arm Project
Project Location: Williams and Henry counties
Applicant: American Transmission Systems, Incorporated
Application Filing Date: October 3, 2019
Filing Type: Letter of Notification
Inspection Date: November 13, 2019
Report Date: February 21, 2020
**Recommended Automatic
Approval Date:** N/A
Applicant's Waiver Requests: none
Staff Assigned: J. O'Dell, G. Zeto, and F. Butt

Summary of Staff Recommendations (see discussion below):

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

Project Description

American Transmission Systems, Incorporated (ATSI or Applicant) proposes to construct a new 5.7-mile long transmission line utilizing open tower arm positions on existing structures. The new transmission line would be installed on the northern side of the Napoleon-Richland-Stryker 138 kilovolt (kV) Transmission Line.

One new two-pole wood laminated structure would be installed within the right-of-way of the existing transmission line. Additionally, a new 138 kV circuit breaker would be added to the Stryker Substation. The capital cost of this project is \$7,715,066 and that cost would be borne by the Applicant.

Need

The Applicant proposes to eliminate a potentially problematic three-terminal line design because this type of line configuration is non-optimal and prone to relay mis-operations. Furthermore, three-terminal lines are not consistent with current transmission system best practices or ATSI's design criteria. ATSI stated that, since 2015, the current facility has experienced three sustained outages with an average of 8.6 hours per outage.

In response to Staff data requests, the Applicant clarified that these three outages were caused by a conductor splice failure, a lightning strike, and a bus-side-disconnect switch failure. However, the Applicant attributed all these issues to the Richland 138 kV Substation. No part of this project addresses any specific issues at the Richland Substation, which is the basis for the three outages. None of these outages can be attributed exclusively to the presence of the three terminal line configuration.

The Napoleon-Richland-Stryker 138 kV Transmission Line is one of three lines supplying power to the Stryker area. The total area load is approximately 62 megawatts, serving approximately 11,800 customers. Additionally, the Allen Junction-East Fayette 138 kV Line and Wauseon 138 kV Substation feed into the Stryker area. An outage on the Napoleon-Richland-Stryker line does not immediately cause an outage to the served load. If this line were to be out for maintenance or operational flexibility, it would not pose an immediate threat of an outage to the local customers.

Beyond the expressed complexity in coordinating relays, there is no history of any operational issues shared by ATSI with Staff on this three-terminal line. ATSI's engineering decision is based upon industry knowledge that three terminal line configurations can result in equipment degradation due to mis-operations caused by relay coordination issues and does not align with ATSI's current design standards.

Staff submitted multiple interrogatories to better interpret and verify the need for the project. The Applicant's initial provision of limited information contributed to an extension of the review process. After discussions, staff believes that ATSI has correctly and sufficiently described potential problems resulting from the relay coordination issue. Staff now recommends approval of the project, which should alleviate the difficulties of coordinating relays and the potential damage that may occur at substations due those difficulties.

Nature of Impacts

Land Use

The project originates in the Village of Stryker in Williams County and it terminates approximately 1,600 feet west of County Road 25 (at Structure 265) in Ridgeville Township, Henry County. Agricultural and rural residential land uses dominate the project area.

Cultural Resources

ATSI conducted a cultural resource survey to ascertain potential impacts to historic properties and archaeological sites. The survey determined that adverse impacts to historic properties and archaeological sites are not expected. Staff concurs with the survey results.

Surface Waters

The survey corridor contains five streams, including three perennial and two intermittent streams. No poles would be located in streams. No in-water work is planned and no direct stream impacts are anticipated.

The survey corridor contains six wetlands totaling 3.39 acres, including three category one wetlands and three category 2 wetlands. Structure 265a, a two pole wooden structure, would be placed within a wetland. The direct embed installation of this structure would not result in a loss in aquatic function of the wetland and no permitting would be required. Construction access would

require wetland crossings. The Applicant would use timber matting to minimize temporary impacts.

The Applicant would submit a Notice of Intent for coverage under the Ohio Environmental Protection Agency for a National Pollutant Discharge Elimination System permit. Erosion control measures including silt fencing would be used where appropriate to minimize runoff impacts to surface water resources.

The project area overlaps with two 100-year floodplain areas. However, no new structures would be placed within a floodplain.

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, the Ohio Department of Natural Resources (ODNR) and the U.S. Fish and Wildlife Service recommend seasonal tree cutting dates of October 1 through March 31 for all trees three inches or greater in diameter. The Applicant has committed to following these seasonal tree clearing guidelines. The proposed project is expected not to impact any bat hibernacula.

The project is within the range of the state endangered northern harrier (*Circus cyaneus*). Northern harriers breed and hunt in large wet meadows and dry grasslands. ODNR recommends that construction be avoided in this habitat during the species' nesting period of May 15 through August 1. The majority of the project route is actively used for agricultural purposes. The Applicant intends to restrict any construction activities in undeveloped fields during the species' nesting period to avoid impacts to potential habitat for the Northern Harrier.

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

Conclusion

Staff's review of the application included consideration of the requirements listed in Ohio Revised Code Section 4906.10. Based on Staff's review, the application meets the necessary criteria for granting a certificate. Staff recommends approval of this application provided that the condition listed below 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:

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 docket copies of permits and authorizations, including all supporting documentation, within seven days of receipt.

This foregoing document was electronically filed with the Public Utilities

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in

Case No(s). 19-1765-EL-BLN

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