LETTER OF NOTIFICATION FOR KAMMER-ORMET NO. 1 AND No. 2 138 kV TRANSMISSION LINE EXTENSION PROJECT

PUCO Case No. 20-1102-EL-BLN

Submitted to:
The Ohio Power Siting Board
Pursuant to Ohio Administrative Code
Section 4906-6-05

Submitted by:
Ohio Power Company

June 10, 2020

LETTER OF NOTIFICATION

Ohio Power Company's
Kammer-Ormet No. 1 and No. 2 138 kV Transmission Line Extension Project

4906-6-05

Ohio Power Company (the "Company") is providing the following information to the Ohio Power Siting Board ("OPSB") in accordance with the accelerated application requirements of Ohio Administrative Code ("OAC") Section 4906-6-05.

4906-6-05(B) General Information

B(1) Project Description

The name of the project and applicant's reference number, names, and reference number(s) of resulting circuits, a brief description of the project, and why the project meets the requirements for a Letter of Notification.

The Company is required to extend the existing double-circuit Kammer-Ormet No. 1 138 kV transmission line and the existing double-circuit Kammer-Ormet No. 2 138 kV transmission line (the "Project") in Ohio Township, Monroe County, Ohio to satisfy the Federal Energy Regulatory Comission's ("FERC") order in Docket No. ER19-1302-000 and serve a new Independent Power Producer (the "Customer") in the area. The Project is required to power the future Hannibal Station (Case No. 17-1091-EL-BLN), which is currently under construction by the Customer, and will be used to service a new generation facility being constructed and operated by the Customer.

To facilitate the construction of the Hannibal Station, the Customer took the Kammer-Ormet No. 1 and No. 2 138 kV lines out of service and removed Structure 45 along the Kammer-Ormet No. 1 line and Structure 44 along the Kammer-Ormet No. 2 line. These lines are currently assets of the Customer, but are anticipated to be transferred to the Company in the third quarter of 2020. In order to power the Hannibal Station, the Kammer-Ormet No. 1 and No. 2 138 kV lines are required to be extended, which will require two new structures to be erected per line, totaling 4 new structures for this Project (Figure 1).

The Project meets the requirements for a Letter of Notification ("LON") because it is within the types of projects defined by Item (1)(b) of *Appendix A* to O.A.C. 4906-1-01, *Application Requirement Matrix For Electric Power Transmission Lines*:

> *(1) New construction, extension, or relocation of single or multiple circuit electric power transmission line(s), or upgrading existing transmission or distribution line(s) for operation at a higher transmission voltage, as follows:*
>
> *(b) Line(s) greater than 0.2 miles in length but not greater than two miles in length.*

LETTER OF NOTIFICATION FOR KAMMER-ORMET NO. 1 AND NO. 2 138 KV TRANSMISSION LINE EXTENSION PROJECT

B(2) Statement of Need

If the proposed project is an electric power transmission line or natural gas transmission line, a statement explaining the need for the proposed facility.

The Project is necessary to connect the future Hannibal 138 kV station, which will serve as the interconnection point for the Long Ridge Energy Generation project as governed by the PJM IPP Interconnection Process (FERC Interconnection Service Agreement ("ISA") 5300 and Docket No. ER19-1302-000). This generation project has a PJM identifier of AB2-093 and is a 485 MW natural gas-fueled power plant in Hannibal, Ohio, at the site of the former Ormet facility. The existing Kammer-Ormet No. 1 and No. 2 138 kV double-circuit transmission lines must be extended to connect to the new Hannibal station. The extension will require 4 additional structures.

The PJM Network Upgrade IDs for the 138 kV transmission line modifications are n5560 and n5561, for Kammer-Ormet No. 1 and No. 2, respectively. The Project was listed in the Company's 2020 Long-Term Forecast Report, Table FE-T7, page 60 of 119.

B(3) Project Location

The applicant shall provide the location of the project in relation to existing or proposed lines and substations shown on an area system map of sufficient scale and size to show existing and proposed transmission facilities in the project area.

The Project is located in Ohio Township, Monroe County, Ohio. The location of the Project in relation to existing transmission lines and stations is shown on Map 1 in Appendix A. The Project directly impacts the following existing facilities:

- Kammer-Ormet No. 1 138 kV Transmission Line
- Kammer-Ormet No. 2 138 kV Transmission Line

B(4) Alternatives Considered

The applicant shall describe the alternatives considered and reasons why the proposed location or route is best suited for the proposed facility. The discussion shall include, but not be limited to, impacts associated with socioeconomic, ecological, construction, or engineering aspects of the project.

The Project will be constructed within existing easements on property owned by the Customer (Parcel Number 150020130000). The Project area is located within the Hannibal Industrial Park and consists of industrial land uses, including an environmental superfund site, situated along the Ohio River. The parties have executed an ISA and a Supplemental Agreement relating to the Hannibal Switching Station and Switching Station Site, via Schedule J to the ISA, in FERC Docket No. ER19-1302-000. The Project was designed to reroute the existing Kammer-Ormet Line No. 1 138 kV line and the existing Kammer-Ormet

Line No. 2 138 kV line into the future Hannibal Station, while minimizing impacts to nearby wetlands and streams. Given that the location of the Project is adjacent to existing electric facilities within an industrial setting, the Project minimizes impacts to the community and natural environment, represents the most direct and appropriate solution for meeting the Customer's needs, and is consistent with the ISA approved by FERC. Therefore, no alternatives were considered as part of this Project.

B(5) Public Information Program

The applicant shall describe its public information program to inform affected property owners and tenants of the nature of the project and the proposed timeframe for project construction and restoration activities.

The Company will inform affected property owners and tenants about this Project through several different media. Within seven (7) days of filing this LON, the Company will issue a public notice in a newspaper of general circulation in the Project area. The notice will comply with requirements of OAC Section 4906-6-08(A)(1-6). Further, the Company has mailed (or will mail) a letter, via first class mail, to affected landowners, tenants, contiguous owners and other landowners the Company may approach for an easement necessary for the construction, operation, or maintenance of the Project. The letter will comply with requirements of OAC Section 4906-6-08(B). The Company maintains a website (https://www.aepohio.com/) which provides the public with access to an electronic copy of this LON and the public notice for this LON. An electronic copy of the LON will be served to the public library in each political subdivision for this Project. The Company retains ROW land agents that discuss Project timelines, construction and restoration activities and convey information to affected owners and tenants throughout the project.

B(6) Construction Schedule

The applicant shall provide an anticipated construction schedule and proposed in-service date of the project.

The Company anticipates construction of the Project will begin in September 2020, and the in-service date of the Project will be approximately December 2020.

B(7) Area Map
The applicant shall provide a map of at least 1:24,000 scale clearly depicting the facility with clearly marked streets, roads, and highways, and an aerial image.

Map 1 included in Appendix A identifies the location of the Project area on a United States Geological Survey 1:24,000 quadrangle map. Map 2 in Appendix A is an aerial map of the Project area.

To visit the Project from Columbus, take I-70 E towards Wheeling, West Virginia. Continue on I-70 for approximately 118 miles, then keep right to merge onto I-470 E toward Bellaire/Washington PA. After 6.3 miles take exit 6 for OH-7 South (Ohio River Scenic Byway) toward Bellaire. Follow OH-7 South for 30

miles until reaching the Hannibal Industrial Park. Turn left into the industrial park. Continue for approximately 0.6-mile to the Project site. The coordinates of the Ormet Station are latitude 39.704426, longitude -80.846729.

B(8) Property Agreements

The applicant shall provide a list of properties for which the applicant has obtained easements, options, and/or land use agreements necessary to construct and operate the facility and a list of the additional properties for which such agreements have not been obtained.

The Project is located within existing easements on property owned by the Customer who will provide the Company access to the property for purposes of construction, operation, and maintenance of the facilities proposed herein which is provided for in the executed ISA and Supplemental Agreement relating to the Hannibal Switching Station and Switching Station Site, in FERC Docket No. ER19-1302-000.

Property Parcel Number	Easement Agreement/Option Obtained (Yes/No)
150020130000	Yes*

*The Company may supplement its existing rights under all blanket and defined easements identified above.

B(9) Technical Features

The applicant shall describe the following information regarding the technical features of the Project:

B(9)(a) Operating characteristics, estimated number and types of structures required, and right-of-way and/or land requirements.

The transmission line construction for the Kammer-Ormet Line No. 1 138 kV line will include the following:

Voltage:	138kV
Conductors:	Double Circuit 1,033kCM ACSR 45/7 Ortolan
Static Wire:	(2) 159kCM ACSR 12/7 Guinea
Insulators:	Polymer
ROW Width:	100 Ft
Structure Types:	(2) Single Pole, Double Circuit, Davit arm, dead end on Pier Foundation

The transmission line construction for the Kammer-Ormet Line No. 2 138 kV line will include the following:

Voltage:	138kV
Conductors:	Double Circuit 1,033kCM ACSR 45/7 Ortolan
Static Wire:	(2) 159kCM ACSR 12/7 Guinea
Insulators:	Polymer

ROW Width: 100 Ft
Structure Types: (1) Single Pole, Double Circuit, Davit arm, dead end on Pier Foundation
(1) Single Pole, Single Circuit, dead end on Pier Foundation

B(9)(b) Electric and Magnetic Fields

For electric power transmission lines that are within one hundred feet of an occupied residence or institution, the production of electric and magnetic fields during the operation of the proposed electric power transmission line. The discussion shall include:

Not applicable. There are no occupied residences or institutions located within 100 feet of the proposed Project.

B(9)(c) Project Costs

The estimated capital cost of the project.

The estimated capital cost of the Project, comprised of applicable tangible and capital costs, is approximately $3,100,000. However, the Project is reimbursable through the PJM process and the Customer is responsible for all costs associated with the interconnection.

B(10) Social and Economic Impacts

The applicant shall describe the social and ecological impacts of the project.

B(10)(a) Provide a brief, general description of land use within the vicinity of the proposed project, including a list of municipalities, townships, and counties affected.

The Project is located within Ohio Township, Monroe County, Ohio. Land use in the immediate vicinity of the Project is entirely industrial as the Project is located within an industrial park along the Ohio River. Land use directly impacted by the Project is a mix of existing transmission line ROW, gravel and concrete areas associated with the Customer's and utility facilities (the Hannibal Station). There are no residences within 1,000 feet of the Project. No waterbody or wetland impacts are anticipated to occur as part of the Project.

B(10)(b) Agricultural Land Information

Provide the acreage and a general description of all agricultural land, and separately all agricultural district land, existing at least sixty days prior to submission of the application within the potential disturbance area of the project.

According to the Monroe County Auditor's Office on May 26, 2020, the Project area is not located within a registered Agricultural District Land. Desktop and field review did not indicate any agricultural land within the immediate vicinity of the Project area (see Map 2 in Appendix A).

B(10)(c) Archaeological and Cultural Resources

Provide a description of the applicant's investigation concerning the presence or absence of significant archeological or cultural resources that may be located within the potential disturbance area of the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.

In May 2020, cultural resource information regarding known locations of archaeological and architectural resources and their National Register of Historic Places status were obtained from the Ohio Historic Preservation Office's online system. Results of this review indicated there are no previously identified cultural resources within the 1,000-foot of the existing lines. A cultural resource field survey will be conducted by the Customer's consultant for the Project, and results will be documented in a Phase I Archaeological Survey Report and a Historic Architectural Reconnaissance Survey Report which will be submitted to the State Historic Preservation Office ("SHPO"). Correspondence from the SHPO will be provided to the OPSB upon receipt.

B(10)(d) Local, State, and Federal Agency Correspondence

Provide a list of the local, state, and federal governmental agencies known to have requirements that must be met in connection with the construction of the project, and a list of documents that have been or are being filed with those agencies in connection with siting and constructing the project.

A project-specific Storm Water Pollution Prevention Plan will be prepared and a Notice of Intent will be filed with the Ohio Environmental Protection Agency for authorization of construction storm water discharges under General Permit OHC000005. The Company will implement and maintain best management practices to minimize erosion and control sediment to protect surface water quality during storm events.

A wetland and stream identification field investigation was completed by the Customer's consultant in May 2020 (Appendix C). No streams, wetlands or other sensitive natural resources were identified within the review area. No impacts are anticipated.

The Project is not located within a Federal Emergency Management Agency ("FEMA") 100-year floodplain area (FEMA, Flood Insurance Rate Map, Panel 230 of 350 Map Number 39111C0230C Effective August 19, 2010). Therefore, no floodplain permitting is required for the Project.

There are no other known local, state or federal requirements that must be met prior to commencement of the Project.

B(10)(e) Threatened, Endangered, and Rare Species

Provide a description of the applicant's investigation concerning the presence or absence of federal and state designated species (including endangered species, threatened species, rare species, species proposed for listing, species under review for listing, and species of special interest) that may be located within the potential disturbance area of the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.

The United States Fish and Wildlife Service ("USFWS") *County Distribution of Federally-Listed Threatened, Endangered, Proposed, and Candidate Species* (available at https://www.fws.gov/midwest/endangered/lists/pdf/OhioCtyList29Jan2018.pdf) document was reviewed to determine the threatened and endangered species known to occur in Monroe County. This USFWS publication listed the following species as occurring within Monroe County: Indiana bat (*Myotis sodalis*; federally endangered) and northern long-eared bat (*Myotis septentrionalis*; federally threatened). The Project is not anticipated to require tree clearing, thus impacts to these federally listed species are not anticipated.

Several state-listed threatened species, endangered species, and species of concern are listed by the Ohio Department of Natural Resources ("ODNR") as occurring, or potentially occurring in Monroe County. However, as the Project area is located within a heavily industrial area and no tree clearing or in water work are required for the Project, impacts to state listed species are not anticipated.

As part of the ecological study completed for the Project, a coordination letter was submitted to the USFWS' Ohio Ecological Services Field Office seeking technical assistance on the Project for potential impacts to threatened or endangered species. A coordination letter was also submitted to the ODNR Department of Water Natural Heritage Program seeking an environmental review of the Project for potential impacts on state-listed threatened or endangered species. The Company will provide the OPSB with supplemental information containing the responses from the ODNR and USFWS upon receipt. Coordination letters sent to the ODNR and USFWS are provided in Appendix C.

B(10)(f) Areas of Ecological Concern

Provide a description of the applicant's investigation concerning the presence or absence of areas of ecological concern (including national and state forests and parks, floodplains, wetlands, designated or proposed wilderness areas, national and state wild and scenic rivers, wildlife areas, wildlife refuges, wildlife management areas, and wildlife sanctuaries) that may be located within the potential disturbance area of the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.

Coordination letters were submitted to the ODNR and USFWS in May 2020 requesting a review of the Project area and identification of areas of ecological concern. Responses have not been received. The Company will provide the OPSB with supplemental information containing the responses from the ODNR and USFWS upon receipt. Coordination letters with the ODNR and USFWS are provided in Appendix C. However, the Company does not anticipate impacts to state- or federally-managed land or ecological resources to occur as a result of the Project.

The Project is located within an industrial park on property owned by the customer. No parks, wildlife refuges, or other areas of ecological concern are located in the project vicinity. No properties identified in the National Conservation Easement Database (http://www.conservationeasement.us) were identified within the Project vicinity.

The Project is not located within a FEMA 100-year floodplain area (FEMA, Flood Insurance Rate Map, Panel 230 of 350 Map Number 39111C0230C Effective August 19, 2010). Therefore, no floodplain permitting is required for the Project.

A review of the National Wetlands Inventory ("NWI") database indicated there are no NWI-mapped wetlands within the Project area. Wetland and stream delineation field surveys were completed within the Project area by the Company's consultant in May 2020. The results of the wetland and stream delineations are presented in the Ecological Survey Report included in Appendix C. No wetlands or streams were identified in the Project study area.

B(10)(g) Unusual Conditions

Provide any known additional information that will describe any unusual conditions resulting in significant environmental, social, health, or safety impacts.

To the best of the Company's knowledge, unusual conditions existing with respect to the structures that are the subject of this Project that would result in substantial environmental, social, health, or safety impacts~~,~~ are the responsibility of the Customer.

Appendix A Project Maps

Maps 1 and 2

Legend

- Proposed 138kV Transmission Line
- Existing 138kV Transmission Line
- Proposed Station

USGS Topographic, Esri ArcGIS Online, Accessed 06/2020.

NAD 1983 State Plane
Ohio South Feet

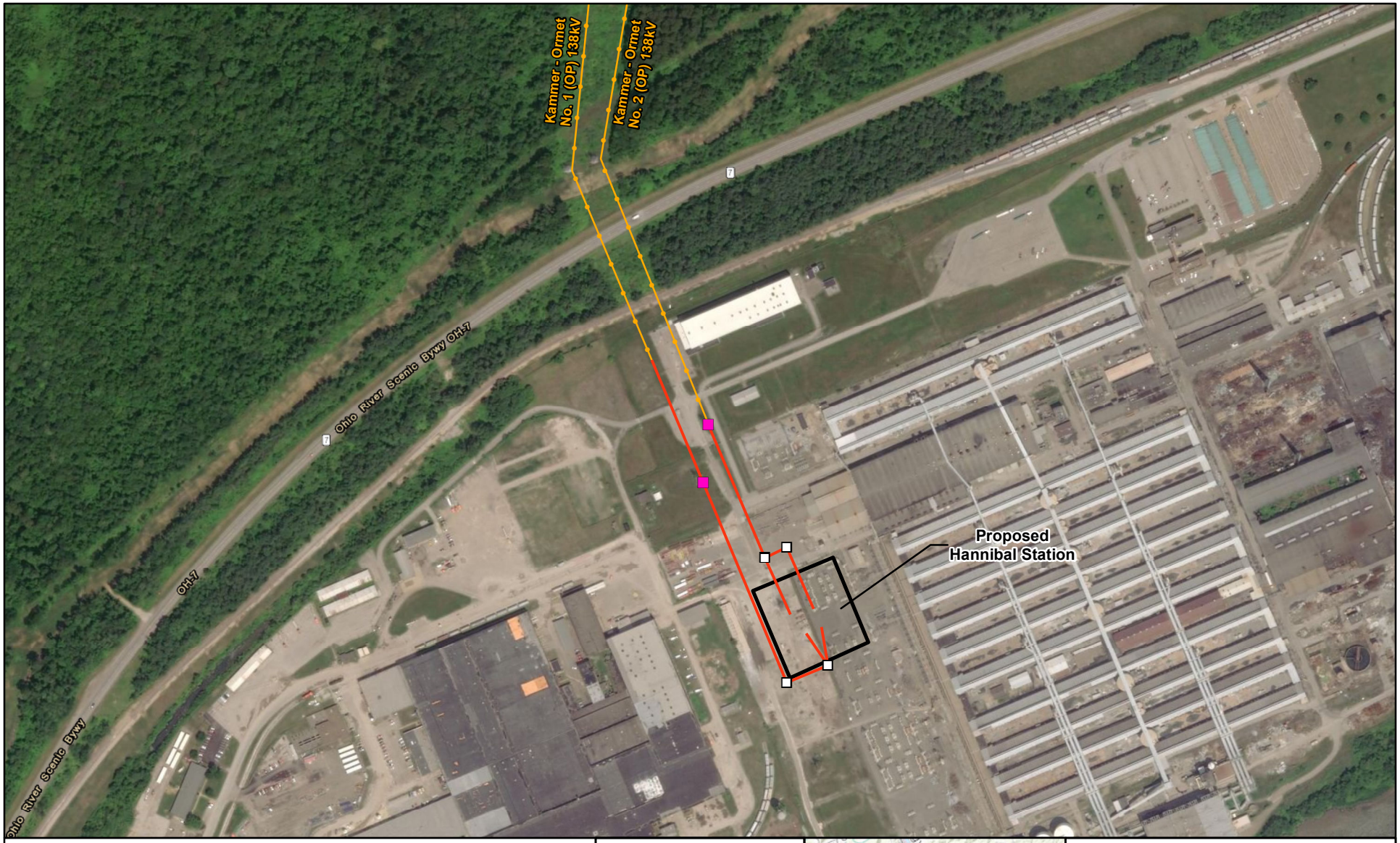
June 01, 2020

Map 1
Project Location Map

AMERICAN ELECTRIC POWER
BOUNDLESS ENERGY™

Kammer-Ormet No.1 and No.2 138 kV Transmission Line Extension Project

0 125 250 375 500
Feet



Legend

- Proposed Structure
- Existing Structure
- Proposed 138kV Transmission Line
- Existing 138kV Transmission Line
- Proposed Station

Esri World Imagery, Maxar, 2015. Transportation, ArcGIS Online, Accessed 06/2020. Esri ArcGIS Online, Accessed 06/2020.

NAD 1983 State Plane
Ohio South Feet

June 01, 2020

Map 2
Aerial Map

AMERICAN ELECTRIC POWER
BOUNDLESS ENERGY™

Kammer-Ormet No.1 and No.2 138 kV Transmission Line Extension Project

0 125 250 375 500
Feet

Appendix B 2020 Long Term Forecast Report

PUCO Form FE-T7: AEP Ohio Power
Characteristics of Existing Transmission Lines

Transmission Name & Line No.[a]	Point of (Origin - Terminus)	Summer Capability		Winter Capability		Operating Voltage (kV)	Design Voltage (kV)	Right-of-Way		Type of Supporting Structure	Number of Circuits		Substations on the Line
List Each Transmission Line of 125 kV or More	Indicate Location of Line's Beginning and Terminus	Normal Rating	Emergency Rating	Normal Rating	Emergency Rating	Indicate Design Voltage and Operating Voltage For Each Line		Length (Miles)	Width Max./Min. (feet)	Steel Towers, Wood Poles or Underground, etc. and Number of Miles of the Line of Each Structure	Design	Installed	Substation Name
24800	Herlan - Natrium #2	205	284	258	320	138	138	27.9	100/100	Wood - H-frame	1	1	SOMERTON
28497	Herlan - South Caldwell	205	284	258	320	138	138	15.4	100/100	Wood - 1 pole	1	1	CALDWELL
24802	Herlan - Summerfield	205	284	258	320	138	138	1.41	100/100	Steel - Lattice	1	1	
640	Hess Street - OSU	187	240	240	285	138	138	1.92	100/100	UG Cable - Duct & Manhol	1	1	
679	Hess Street - Vine	183	251	204	269	138	138	2.42	100/100	UG Cable - Duct & Manhol	1	1	
641	Hess Street - Wilson Road	187	223	247	281	138	138	6.86	100/100	UG Cable - Duct & Manhol	1	1	FIFTH AVENUE
21678	Highland (CSP) - Seaman	195	220	216	239	138	138	14.39	100/100	Steel - 2 pole	1	1	
2982	Hillsboro - Millbrook Park	185	185	234	234	138	138	95.06	100/100	Steel - Lattice	1	1	
18077	Hillsboro - Wildcat	185	185	234	234	138	138	9.88	100/100	Steel - 1 pole	1	1	
22498	Holloway - Tidd	971	971	1234	1234	345	345	22.87	150/150	Steel - Lattice	1	1	
22939	Howard - Melmore #1	136	167	179	206	138	138	26.97	100/100	Wood - 1 pole	1	1	
22941	Howard - Melmore #2	136	167	179	179	138	138	26.97	100/100	Wood - 1 pole	1	1	
12239	Howard - North Bellville	136	173	179	206	138	138	18.01	100/100	Wood - 1 pole	1	1	
25597	Howard - North Lexington	200	200	253	253	138	138	12.5	100/100	Steel - Lattice	1	1	
13577	Howard - Shelby #2 138 kV	96	96	96	96	138	138	2.36	100/100	Steel - Lattice	1	1	
4783	Howard - West End Fostoria 138 kV	136	167	179	179	138	138	45.34	100/100	Steel - Lattice	1	1	CHATFIELD
665	Huntley - Linworth	223	223	281	281	138	138	3.72	100/100	Steel - 1 pole	1	1	
19359	Hyatt - Vassell	1370	1409	1779	1781	345	345	15.88	150/150	Steel - Lattice	1	1	
6226	Hyatt (CSP) - Maliszewski #1	223	310	281	349	138	138	6.83	100/100	Wood - 1 pole	1	1	
6227	Hyatt (CSP) - Maliszewski #2	338	407	427	484	138	345	5.1	150/150	Steel - Lattice	1	1	
645	Hyatt (Csp) - Sawmill #1	340	434	430	501	138	138	5.32	100/100	Steel - 1 pole	1	1	
25058	Hyatt (CSP) - Sawmill #2	388	526	492	597	138	765	5.32	200/200	Steel - Lattice	1	1	
584	Hyatt (OP) - Marysville	1166	1376	1481	1639	345	345	23.24	150/150	Steel - Lattice	1	1	
550	Hyatt (OP) - West Millersport	971	1376	1234	1585	345	345	49.68	150/150	Steel - Lattice	1	1	
26958	June Road - Tidd	195	220	216	239	138	138	42.3	100/100	Steel - 1 pole	1	1	EAST AMSTERDAM, BROADACRE, PANDA ROAD SWITCH
26957	June Road - Wagenhals	335	392	424	466	138	138	11.5	100/100	Wood - 2 pole	1	1	
544	Kammer - South Canton	2977	2977	2977	2977	765	765	79.57	200/200	Steel - Lattice	1	1	
19899	Kammer - Vassell	4047	4571	4484	4961	765	765	114.47	200/200	Steel - H-frame	1	1	
22338	Kammer - West Bellaire	1740	2034	2022	2235	345	345	13.21	150/150	Steel - Lattice	1	1	
722	Kammer South - Ormet #1	296	398	375	452	138	138	11.54	100/100	Steel - Lattice	1	1	
2101	Kammer South - Ormet #2	296	398	375	452	138	138	11.54	100/100	Steel - Lattice	1	1	
723	Kammer South - Ormet #3	296	296	375	375	138	138	11.53	100/100	Steel - Lattice	1	1	
724	Kammer South - Ormet #4	296	296	375	375	138	138	11.52	100/100	Steel - Lattice	1	1	
725	Kammer South - West Bellaire	296	398	375	452	138	138	13.58	100/100	Aluminum - Guyed V	1	1	
29397	Karl - Morse #2 138 kV	240	286	286	286	138	138	11.2	100/100	Steel - Lattice	1	1	
621	Kenny - Roberts	213	282	221	328	138	138	3.4	100/100	UG Cable - Duct & Manhol	1	1	
27882	Kirk - Mink	338	338	427	427	138	138	3.52	100/100	Steel - 1 pole	1	1	
2276	Kirk - Newark Center	338	338	427	427	138	138	26.27	100/100	Steel - Lattice	1	1	
19339	Kirk - West Hebron	167	245	210	271	138	138	9.7	100/100	Wood - 1 pole	1	1	
8311	Kirk - West Millersport 345kV	1166	1166	1481	1481	345	345	9.47	150/150	Steel - 1 pole	1	1	
21	Kyger Creek - Spom #1	1028	1419	1294	1585	345	345	12.5	150/150	Steel - Lattice	1	1	
22177	Kyger Creek - Spom #2	971	1419	1234	1585	345	345	12.52	150/150	Steel - Lattice	1	1	
11546	Levee-Belmont(FE)	129	161	162	186	138	138	5.2	100/100	Wood - H-frame	1	1	
27082	Lick - Rhodes	219	238	238	238	138	138	4.2	100/100	Wood - H-frame	1	1	
771	Lockwood Road - Robison Park	219	255	277	303	138	138	32.85	100/100	Wood - H-frame	1	1	SOUTH HICKSVILLE
629	LSII - Marion Road	439	439	472	472	138	138	4.62	100/100	Steel - Lattice	1	1	

Appendix C Ecological Survey Report

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Ecological Survey Report

Ohio Power Company
Kammer-Ormet No.1 and No.2 138 kilovolt (kV) Transmission Line Extension Project
Monroe County, Ohio

GAI Project Number: C170352.87, Task 001

May 2020

Prepared by: GAI Consultants, Inc.
Canton Office
3720 Dressler Road Northwest
Canton, Ohio 44718

Prepared for: Ohio Power Company
1 Riverside Plaza
Columbus, Ohio 43215

Ecological Survey Report

Ohio Power Company
Kammer-Ormet No.1 and No.2 138 kV Transmission Line Extension Project
Monroe County, Ohio

GAI Project Number: C170352.87, Task 001

May 2020

Prepared for:
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Joshua J. Noble, MS
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Table of Contents

1.0 Introduction

GAI Consultants, Inc. (GAI), on behalf of Ohio Power Company (AEP Ohio), completed an ecological survey for the Ormet 138-kilovolt (kV) Transmission Substation Project (Project) located in Monroe County, Ohio (OH). The proposed Project involves rebuilding the station by replacing failing, antiquated equipment within the extents of the existing station, as well as associated line work.

An ecological survey was conducted on May 26, 2020. The Project study area consisted of an 18.0-acre area, as shown in Figure 1.

The Project study area is located within the Haynes Run - Ohio River (United States Geological Survey [USGS] Hydrologic Unit Code [HUC] # 050302011004) watershed.

This report details the results of the ecological survey regarding the existence of aquatic resources within the Project area (Figure 2).

2.0 Methods

2.1 Wetlands

The 1987 USACE *Corps of Engineers Wetlands Delineation Manual* (Wetlands Delineation Manual) (USACE, 1987) and the 2012 *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Eastern Mountain and Piedmont Region, Version 2.0* (Regional Supplement) (USACE, 2012) describe the methods used to identify and delineate wetlands that fall under the jurisdiction of the USACE. This approach recognizes the three (3) parameters of wetland hydrology, hydrophytic vegetation, and hydric soils to identify and delineate wetland boundaries. In accordance with the Wetlands Delineation Manual and Regional Supplement, GAI completed preliminary data gathering and onsite inspections.

2.1.1 Preliminary Data Gathering

The preliminary data gathering is used to compile and review information that may be helpful in identifying wetlands and/or areas that warrant further inspection during the investigation. The preliminary data gathering includes a review of the following:

- USGS 7.5-minute topographic mapping for Round Bottom (USGS 1978) and New Martinsville, OH (USGS, 1977) (Figure 1);
- United States Fish and Wildlife Service (USFWS), National Wetlands Inventory (NWI) mapping (USFWS, 2019) (Figure 2);
- Federal Emergency Management Agency (FEMA), National Flood Hazard Layer (FEMA, 2019) (Figure 2); and
- United States Department of Agriculture, Natural Resources Conservation Service (USDA-NRCS, 2019) soil mapping (Figure 2).

Topographic mapping is used to identify mapped streams and the overall shape of the landscape in the Project area to determine potential locations for wetlands, such as floodplains and depressions. NWI mapping is used to determine locations where probable wetlands are located based on infrared photography. Soil mapping is reviewed to determine the location and extent of mapped hydric soils that have a high probability of containing wetlands.

2.1.2 Onsite Inspection

The methodology described in the Regional Supplement identifies areas meeting the definition of a wetland by evaluating three parameters: hydrology, vegetation, and soil. During the on-site inspection, GAI staff traversed the Project study area on foot to determine if any indicators

of wetlands were present. When indicators of wetlands are observed, an observation point is established, and a Wetland Determination Data Form (Data Form) is completed to determine if all three wetland indicators are present.

The presence of wetland hydrology is determined by examining the observation point for primary and secondary indicators of wetland hydrology. The presence of any primary indicator signifies the presence of wetland hydrology, or the presence of two (2) or more secondary indicators signifies the presence of wetland hydrology.

Vegetation is characterized by four (4) different strata. This includes trees (woody plants, excluding vines, three inches or more [≥ 3.0″] in diameter at breast height [DBH]), saplings/shrubs (woody plants, excluding vines, less than three inches [< 3.0″] DBH and greater than or equal to [≥] 3.28 feet tall), herbs (non-woody plants, regardless of size, and all other plants less than [<] 3.28 feet tall), and woody vines (greater than 3.28 feet tall). In general, trees and woody vines are sampled within a thirty-foot (30.0′) radius, saplings and shrubs are sampled within a fifteen-foot (15.0′) radius, and herbs are sampled within a five-foot (5.0′) radius.

When evaluating an area for the presence of hydrophytes, classification of the indicator status of vegetation is based on *The National Wetland Plant List: 2016 Update of Wetland Ratings* (Lichvar et al., 2016). The list of possible indicator statuses for plants is as follows:

- Obligate Wetland (OBL) - Obligate Wetland plants occur in standing water or in saturated soils;
- Facultative Wetland (FACW) - Facultative Wetland plants nearly always occur in areas of prolonged flooding or require standing water or saturated soils but may on rare occasions, occur in non-wetlands;
- Facultative (FAC) - Facultative plants occur in a variety of habitats, including wetland and mesic to xeric non-wetland habitats but often occur in standing water or saturated soils;
- Facultative Upland (FACU) - Facultative Upland plants typically occur in xeric or mesic non-wetland habitats but may frequently occur in standing water or saturated soils; and,
- Obligate Upland (UPL) - Obligate Upland plants almost never occur in water or saturated soils.

Presence of hydrophytic vegetation is determined by using a Rapid Test, Dominance Test or Prevalence Index. The Rapid Test finds a vegetation community to be hydrophytic if all dominant species are OBL or FACW. Hydrophytic vegetation is considered present based on the Dominance Test if more than fifty percent (50%) of dominant species are OBL, FACW, or FAC. The Prevalence Index weighs the total percent of vegetation cover based on the indicator status of each plant. Hydrophytic vegetation is considered present when the Prevalence Index is less than or equal to (≤) 3.0 (USACE, 2012).

To determine the presence of hydric soils, soil data is collected by digging a minimum sixteen inch (16.0″) deep soil pit. The soil profile is studied and described, while possible hydric indicators are examined. Soil indicators described in the Wetlands Delineation Manual and Regional Supplement are used to determine the presence of hydric soils. The presence of any of these indicators signifies a hydric soil.

If all three parameters including wetland hydrology, a dominance of hydrophytic vegetation, and hydric soils are identified at a single observation point, the area is determined to be a wetland. Once a wetland is identified, the boundary is delineated.

Wetland boundaries are determined by looking for locations in which one of the three wetland indicators would transition into an upland characteristic. When the transition is identified, a Data Form is completed in the Upland Area. Wetland boundaries are then marked in the field using pink flagging labeled "WETLAND DELINEATION." The locations of the flags are recorded using a Global Positioning System (GPS) unit. Each wetland is codified with a unique identifier indicating the feature type and number (e.g., W001).

Wetlands are then classified using the *Classification of Wetlands and Deepwater Habitats of the United States* as modified for NWI Mapping Convention. This system classifies wetlands based on topographic position and vegetation type. Palustrine system wetlands found within the study area are classified as Palustrine Emergent (PEM), Palustrine Scrub-Shrub (PSS), Palustrine Forested (PFO), or Palustrine Unconsolidated Bottom (PUB) based on aerial coverage of the vegetative community across the extent of the wetland boundary (Cowardin et al., 1979).

2.2 Waterbodies

As with wetlands, Sections 404 and Section 401 of the Clean Water Act (CWA) and state regulations protect waterbodies in OH. Generally, waterbodies are defined as environmental features that have defined beds and banks, ordinary high water mark (OHWM), and contain flowing or standing water for at least a portion of the year.

2.2.1 Preliminary Data Gathering

During the preliminary data gathering, the USGS 7.5-minute topographic mapping is examined for the presence of mapped waterbodies including perennial and intermittent streams. In addition, the topographic mapping is used to identify areas likely to contain unmapped waterbodies including ephemeral streams (USGS, 1977) (Figure 1).

The Ohio Environmental Protection Agency (OEPA) 401 Water Quality Certification for the 2017 Nationwide Permits Stream Eligibility Web Map (OPEA, 2017) is used to determine eligibility for coverage under the 401 Water Quality Certification (WQC) for the 2017 Nationwide Permits (NWPs). Furthermore, the map is used to identify any ineligible areas that may require a CWA Section 401 individual permit from the OEPA should stream impacts occur within the Project area (OEPA, 2017) (Figure 3).

2.2.2 Onsite Inspection

During the onsite inspection, GAI staff traversed the study area, concurrently with the wetland inspection, whereby waterbodies are identified. Waterbodies are identified based on the morphological and hydrologic characteristics of the channel and the presence of aquatic macroinvertebrates.

When a waterbody is identified, field measurements are collected. The measurements include top of bank width, top of bank depth, pool depth, water depth, OHWM width, and OHWM depth. A detailed description of substrate composition is also recorded. Waterbodies are then delineated using white flagging marked with the GAI stream code (e.g., S001). The tops-of-bank for streams wider than ten feet (>10.0') are delineated, while the centerline of smaller streams is delineated. The locations of the flags are recorded using a sub-meter-capable hand-held GPS unit.

2.3 Rare, Threatened, and Endangered Species

GAI conducts a literature review of potential Rare, Threatened, and Endangered (RTE) species in the vicinity of the Project study area. Potential habitat for RTE species as a result of the literature review is noted during the ecological survey.

2.3.1 Preliminary Data Gathering

A request for review of the Ohio Natural Heritage Database (ONHD) is submitted to the Ohio Department of Natural Resources (ODNR) to determine if any state-listed Threatened or Endangered species occur within a one-mile (1.0 mi) radius of the Project area. A request is also submitted to the USFWS Ohio Ecological Services Field Office to determine if any federally-listed Threatened or Endangered species occur within the vicinity of the Project area.

2.3.2 Onsite Inspection

During the onsite inspection, GAI staff traverse the study area in conjunction with the wetland and waterbody inspections to determine if suitable habitat for state- and/or federally-listed RTE species is present within the study area.

3.0 Results

3.1 Wetlands

3.1.1 Preliminary Data Gathering

Desktop review of available USFWS NWI digital data for the Project revealed no NWI mapped wetlands located within the Project study area (USFWS, 2019).

According to the USDA-NRCS soil mapping, one (1) soil map unit is located within the Project study area (Figure 2). No soil map units are classified as hydric or known to contain hydric inclusions.

3.1.2 Onsite Inspection

No wetlands were identified within the Project study area.

3.1.3 Regulatory Discussion

The USACE guidance divides waterbodies into three (3) groups: Traditionally Navigable Waters (TNWs), non-navigable Relatively Permanent Waters (RPWs), and non-navigable Non-RPWs. TNWs are waterbodies which have been, are, or may be susceptible to use in interstate commerce, including recreational use of the waterbody. RPWs are waterbodies that flow year-round, or at a minimum seasonally, by exhibiting continuous flow for at least three (3) consecutive months, but are not TNWs. Non-RPWs are waterbodies that do not flow continuously for at least three (3) consecutive months, are not TNWs or RPWs, but typically exhibit characteristic beds, banks, and OHWM (USACE, 2007).

The status of wetlands is determined partly based on the classification of the waterbody that the wetland is associated with, and the degree of that association. Wetlands that abut or are adjacent to TNWs are jurisdictional. Wetlands that abut RPWs are jurisdictional. Wetlands that are adjacent to RPWs and wetlands that abut or are adjacent to Non-RPWs must be subjected to the Significant Nexus Test (SNT) to determine their jurisdictional status. Generally, the USACE considers wetlands that are isolated, meaning that they are not associated with any other surface water feature, as non-jurisdictional; and wetlands that abut or are adjacent to Non-RPWs as needing further examination by the USACE to determine and verify whether they exhibit a significant nexus to waters of the United States. If these wetlands exhibit a significant nexus, they are jurisdictional; if not, they are not subject to USACE jurisdiction (USACE, 2007).

Wetlands that do not exhibit an association with any surface water are categorized as "isolated" under present USACE guidance and policy (USACE, 2007). These wetlands are regulated by the OEPA Division of Surface Water, and may require an Isolated Wetland Permit.

As regulated by Ohio Administrative Code (OAC) rules 3745-1-50 through 3745-1-54, wetlands were also evaluated using the ORAM to determine the appropriate wetland category. Any wetland score that fell within a gray zone between categories was scored one of two ways. Either the wetland was assigned to the higher of the two categories or it was assessed using a non-rapid method to determine its quality (Mack, 2001). The category assigned to a particular wetland determines the requirement, if any, for additional levels of protection administered by the OEPA.

3.2 Waterbodies

3.2.1 Preliminary Data Gathering

Desktop review of the available USGS topographic mapping revealed no previously mapped stream segments located within the Project study area (Figure 1). Desktop review of OEPA's Stream Eligibility Web Map revealed the Project is located within a possibly eligible area for automatic 401 WQC coverage (Figure 3).

3.2.2 Onsite Inspection

No stream segments were identified within the Project study area. Photographs of identified resources are included in Appendix A.

3.2.3 Regulatory Discussion

As with wetlands, present USACE guidance and policy determines the jurisdictional status of waterbodies identified during the Project. TNWs and RPWs are jurisdictional. Non-RPWs must be subjected to the SNT by USACE to determine their jurisdictional status. If Non-RPWs exhibit a Significant Nexus, as defined in USACE guidance documents, they are jurisdictional. If not, they do not fall under the jurisdiction of the USACE.

Streams are generally defined as environmental features that have defined beds and banks, an OHWM, and contain flowing or standing waters for at least a portion of the year (USACE 2005). Streams were classified as perennial, intermittent, or ephemeral based upon presence of flow, estimated duration of flow, stream bed characteristics, and presence of aquatic biota. The USACE *Jurisdictional Determination Form Instructional Guidebook* (USACE, 2007) was used to determine stream classification and flow status.

As regulated by OAC Chapter 3745-1-24, streams were also assessed according to OEPA guidance using either the Headwater Habitat Evaluation Index (HHEI) for watersheds less than one square mile (<1.0 mi^2) in size, or the Qualitative Habitat Evaluation Index (QHEI) for watersheds between one and twenty square miles (1.0-20.0 mi^2) in size.

3.3 Rare, Threatened, and Endangered Species

3.3.1 Preliminary Data Gathering

Desktop review of ODNR, Division of Wildlife's Ohio's Listed Species revealed 338 Endangered, Threatened, Species of Concern, and Species of Interest located in OH (ODNR, 2019). Eighteen (18) of the state-listed species are considered federally endangered, and four (4) are federally threatened.

A review of the USFWS *County Distribution of Federally-Listed Threatened, Endangered, Proposed, and Candidate Species for Ohio*, as well as the USFWS Information for Planning and Consultation (IPaC) website revealed two (2) federally Endangered or Threatened species that

may occur within the Project study area (USFWS, 2019). The list of species includes the following:

- Indiana bat (*Myotis sodalis*) - Endangered; and
- Northern long-eared bat (*Myotis septentrionalis*) – Threatened.

In addition to the species listed above, there are five (5) migratory bird species that may occur within the Project study area.

3.3.2 Onsite Inspection

Potential habitat for RTE species was evaluated within the Project study area. Habitat encountered within the study area consisted of existing industrial sites and maintained, mowed field. No wetlands or streams were identified within the study area. Representative photographs of the identified habitat types are included in Appendix A.

3.3.3 Regulatory Discussion

State-listed RTE species fall under the jurisdiction of the ODNR, Division of Wildlife, while federally-listed species are covered under Section 7 of the Endangered Species Act. The Bald and Golden Eagle Protection Act and Migratory Bird Act aim to extend protection to certain bird species that fall under the jurisdiction of the USFWS. Based on the desktop review and onsite inspection, informal consultation with the ODNR and USFWS has been initiated to determine if any activities associated with the proposed Project may affect state- and/or federally-listed RTE species. The ODNR and USFWS consultation letters were submitted on May 28, 2020 and are provided in Appendix B. Responses from the USFWS and ODNR are pending.

4.0 Conclusions

An ecological survey was conducted within the Project study area on May 26, 2020. No wetlands or streams were identified within the Project study area. No habitat for state-listed species were found within the Project study area. Representative photographs of the Study Area and identified habitat types are included in Appendix A.

5.0 References

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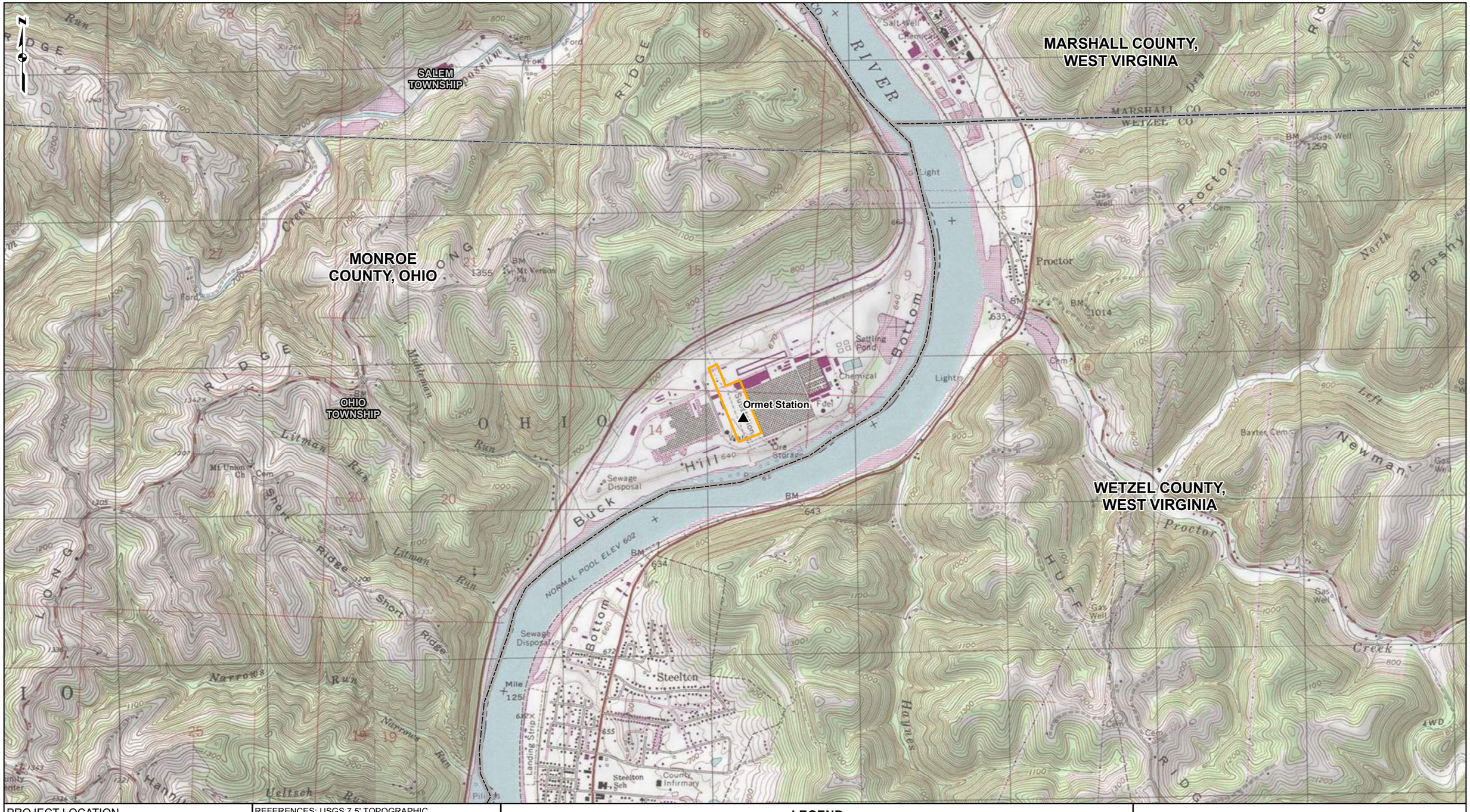
FIGURES



PROJECT LOCATION

MONROE COUNTY, OHIO

REFERENCES: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ROUND BOTTOM (1978) AND NEW MARTINSVILLE (1977), OHIO, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND USGS, ACCESSED 05/2020.

LEGEND

- Substation
- Study Area
- County Boundary
- Township Boundary

0 1,000 2,000 4,000 Feet

FIGURE 1
PROJECT LOCATION MAP

KAMMER-ORMET NO.1 AND NO.2 138 kV
TRANSMISSION LINE EXTENSION PROJECT
OHIO POWER COMPANY

DRAWN BY: EFJ DATE: 5/29/2020
CHECKED: JDP APPROVED:

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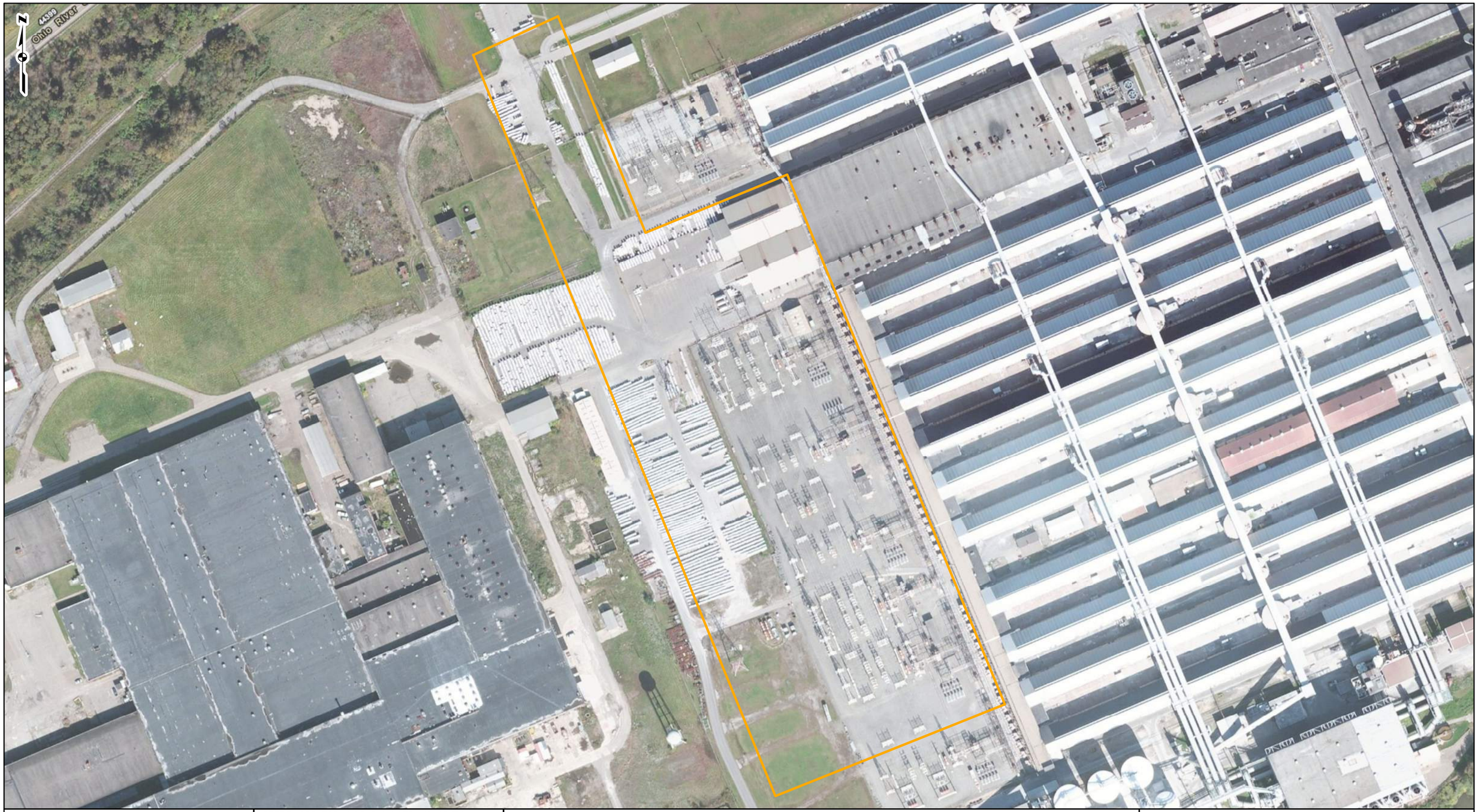

PROJECT LOCATION

MONROE COUNTY, OHIO

REFERENCES: ESRI WORLD IMAGERY (CLARITY), ARCGIS ONLINE, ACCESSED 05/2020. WORLD TRANSPORTATION, ESRI, ARCGIS ONLINE, ACCESSED 05/2020. NATIONAL WETLAND INVENTORY (NWI) WETLANDS, USFWS, 2019. NATIONAL FLOOD HAZARD LAYER, FEDERAL EMERGENCY MANAGEMENT AGENCY (FEMA), OHIO, 2019. SOIL SURVEY GEOGRAPHIC (SSURGO) DATABASE, OHIO, USDA/NRCS, 2019. OHIO DEPARTMENT OF NATURAL RESOURCES (ODNR) LAND, 2018.

LEGEND

- Study Area
- Soil Type Boundary
- NWI Wetland
- 100-Year Floodplain
- FEMA Floodway
- County Boundary
- Township Boundary

0 100 200 400 Feet

FIGURE 2
RESOURCE LOCATION MAP

KAMMER-ORMET NO.1 AND NO.2 138 kV
TRANSMISSION LINE EXTENSION PROJECT
OHIO POWER COMPANY

DRAWN BY: EFJ
CHECKED: JDP
DATE: 5/29/2020
APPROVED:

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PROJECT LOCATION

MONROE COUNTY, OHIO

REFERENCES: ESRI WORLD IMAGERY, MAXAR (2015), ARCGIS ONLINE, ACCESSED 05/2020. WORLD TRANSPORTATION, ESRI, ARCGIS ONLINE, ACCESSED 05/2020. STREAM ELIGIBILITY, OHIO ENVIRONMENTAL PROTECTION AGENCY (OEPA), 2017. NHD STREAMS, NATIONAL HYDROGRAPHY DATASET (NHD), USGS, 2018. WQS STREAMS, OHIO WATER QUALITY STANDARDS, 2010.

LEGEND

- Stream
- NHD Stream
- OH WQS Stream
- Study Area

Ohio EPA Stream Eligibility:

- Ineligible
- Possibly Eligible
- Eligible

0 300 600 1,200 Feet

FIGURE 3
STREAM ELIGIBILITY MAP

KAMMER-ORMET NO.1 AND NO.2 138 kV TRANSMISSION LINE EXTENSION PROJECT
OHIO POWER COMPANY

DRAWN BY: EFJ DATE: 5/29/2020
CHECKED: JDP APPROVED:

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APPENDIX A
Photographs

Photograph 1. Photo Location 1, Representative upland habitat, Facing North.

Photograph 2. Photo Location 1, Representative upland habitat, Facing East.

Photograph 3. Photo Location 2, Representative upland habitat, Facing East.

Photograph 4. Photo Location 2, Representative upland habitat, Facing East.

Photograph 5. Photo Location 3, Representative upland habitat, Facing North-Northwest.

Photograph 6. Photo Location 3, Representative upland habitat, Facing South-Southeast.

Photograph 7. Photo Location 4, Representative upland habitat, Facing East.

Photograph 8. Photo Location 4, Representative upland habitat, Facing West.

APPENDIX B
ODNR and USFWS Correspondence

gai consultants
transforming ideas into reality

gai consultants

Canton Office
3720 Dressler Road Northwest
Canton, Ohio 44718

T 330.433.2680
F 330.433.2694

May 28, 2020

Project C170352.87

Environmental Review Staff
Ohio Department of Natural Resources
Division of Wildlife – Ohio Natural Heritage Program
2045 Morse Road, Building G-3
Columbus, Ohio 43229-6693

American Electric Power
Kammer-Ormet No.1 and No.2 138 kV Transmission Line Extension Project
Request for Technical Assistance Regarding
Threatened and Endangered Species and Critical Habitat
Monroe County, Ohio

Dear Staff:

GAI Consultants, Inc. (GAI), on behalf of American Electric Power (AEP), is requesting information regarding state and federally listed threatened and endangered species in the vicinity of the Kammer-Ormet No.1 and No.2 138 kV Transmission Line Extension Project (Project) in Monroe County, Ohio. As part of this request, please provide information specific to threatened and endangered bats. GAI is requesting the locations of known golden or bald eagle nests known in the area.

The proposed Project involves the reroute of approximately 0.45 miles of the existing Kammer-Ormet No.1 138 kV transmission line and approximately 0.35 miles of the existing Kammer-Ormet No.2 138 kV transmission line into the newly rebuilt Hannibal Station. The Project will also involve the construction of two new structures along each line.

The study area for the Project is shown on the attached map (Figure 1). The habitat within the study area consists mainly of maintained transmission line right-of-way and industrial area within the vicinity of the Hannibal Station. Project shapefiles are included to aid in your review.

GAI and AEP thank you in advance for your assistance. Please contact me at 412.399.5176 or via email at e.dubnicay@gaiconsultants.com if you have questions or require further information.

Sincerely,

GAI Consultants, Inc.

Elizabeth A. Dubnicay Digitally signed by Elizabeth A. Dubnicay
DN: E=E.Dubnicay@gaiconsultants.com, CN=Elizabeth A. Dubnicay
Date: 2020.05.28 09:58:39-04'00'

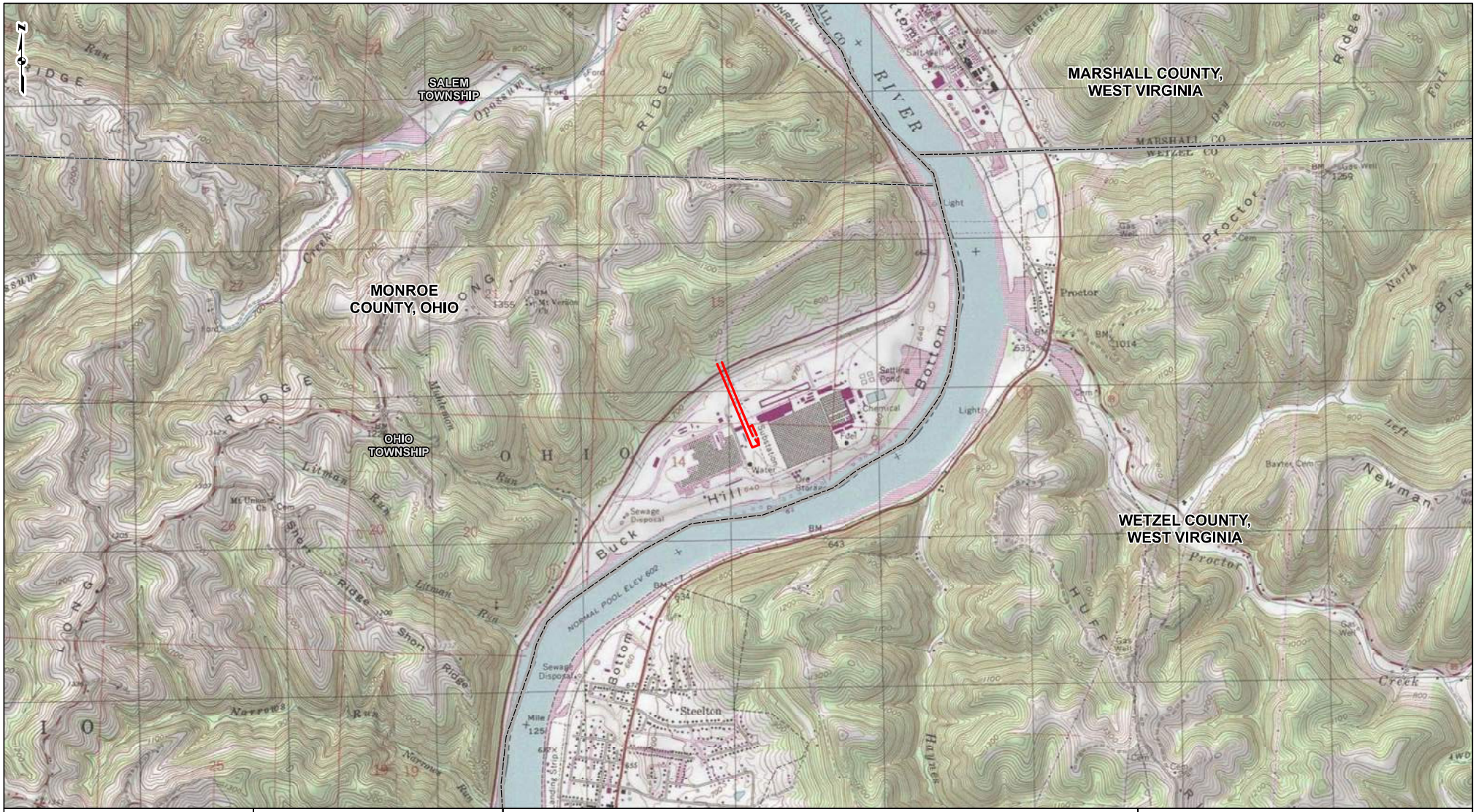
Elizabeth A. Dubnicay
Project Environmental Specialist II

EAD/jbm

Attachments: Attachment 1 – Project Location Map
Project Shapefiles

ATTACHMENT 1

PROJECT LOCATION MAP



PROJECT LOCATION

MONROE COUNTY, OHIO

REFERENCES: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ROUND BOTTOM (1978) AND NEW MARTINSVILLE (1977), OHIO, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND USGS, ACCESSED 05/2020.

LEGEND

- Proposed Transmission Line
- County Boundary
- Township Boundary

0 1,000 2,000 4,000 Feet

PROJECT LOCATION MAP

KAMMER-ORMET NO.1 AND NO.2 138 kV TRANSMISSION LINE EXTENSION PROJECT
AMERICAN ELECTRIC POWER

DRAWN BY: EFJ	DATE: 5/27/2020
CHECKED: JDP	APPROVED:

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gai consultants

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3720 Dressler Road Northwest
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T 330.433.2680
F 330.433.2694

May 28, 2020

Project C170352.87

Ms. Patrice M. Ashfield
United States Fish and Wildlife Service
Ohio Ecological Services Field Office
4625 Morse Road, Suite 104
Columbus, Ohio 43230

American Electric Power
Kammer-Ormet No.1 and No.2 138 kV Transmission Line Extension Project
Request for Technical Assistance Regarding
Threatened and Endangered Species and Critical Habitat
Monroe County, Ohio

Dear Ms. Ashfield:

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Sincerely,

GAI Consultants, Inc.

Elizabeth A. Dubnicay

Digitally signed by Elizabeth A. Dubnicay
DN: E=E.Dubnicay@gaiconsultants.com, CN=Elizabeth A. Dubnicay
Date: 2020.05.28 09:49:41-04'00'

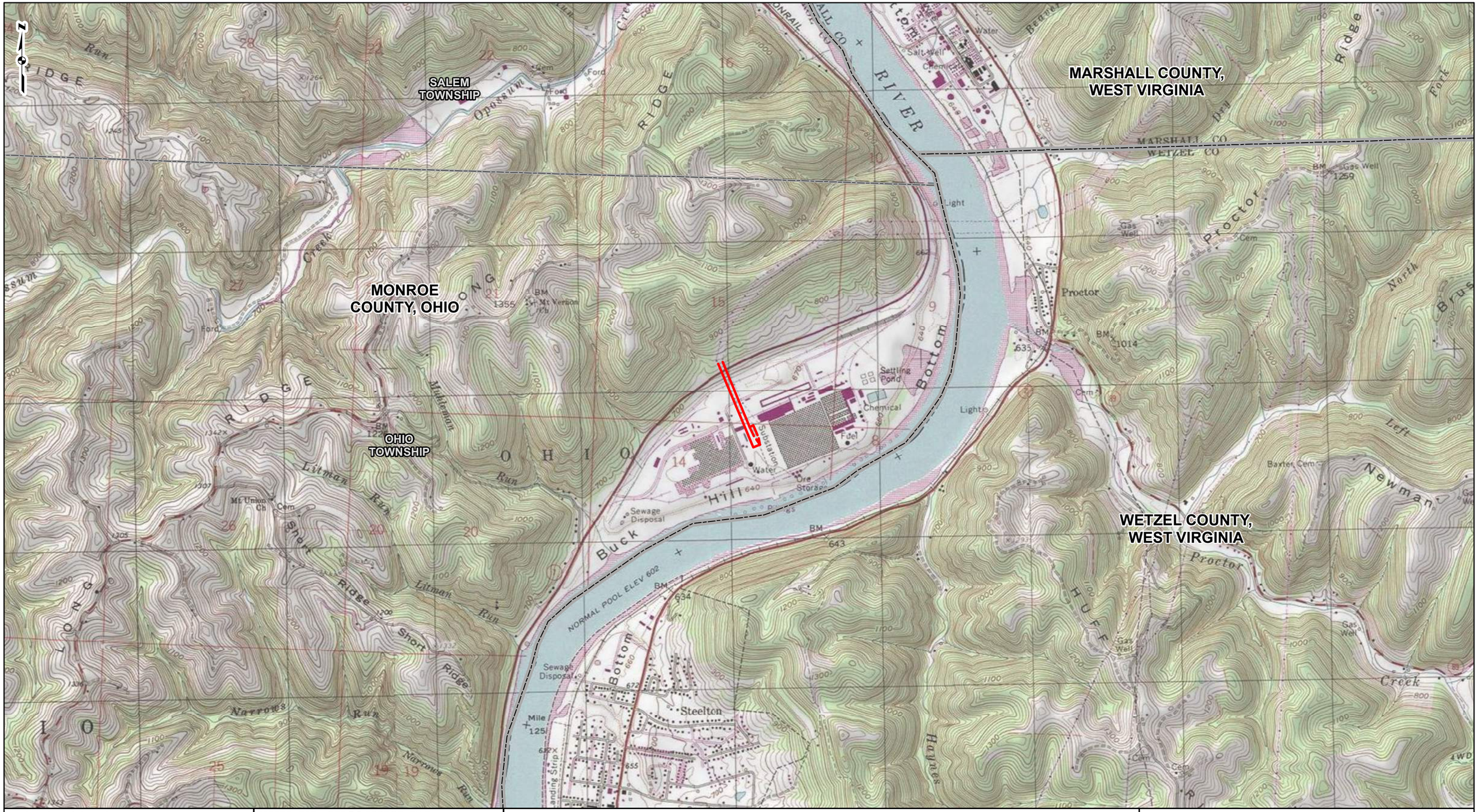
Elizabeth A. Dubnicay
Project Environmental Specialist II

EAD/jbm

Attachments: Attachment 1 – Project Location Map
Project Shapefiles

ATTACHMENT 1

PROJECT LOCATION MAP



PROJECT LOCATION

MONROE COUNTY, OHIO

REFERENCES: USGS 7.5' TOPOGRAPHIC QUADRANGLES: ROUND BOTTOM (1978) AND NEW MARTINSVILLE (1977), OHIO, OBTAINED THROUGH ESRI USA TOPO MAPS, NATIONAL GEOGRAPHIC TOPO AND USGS, ACCESSED 05/2020.

LEGEND

- Proposed Transmission Line
- County Boundary
- Township Boundary

0 1,000 2,000 4,000 Feet

PROJECT LOCATION MAP

KAMMER-ORMET NO.1 AND NO.2 138 kV TRANSMISSION LINE EXTENSION PROJECT
AMERICAN ELECTRIC POWER

DRAWN BY: EFJ
CHECKED: JDP
DATE: 5/27/2020
APPROVED:

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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

6/10/2020 2:21:41 PM

in

Case No(s). 20-1102-EL-BLN

Summary: Notice Letter of Notification Application for the Kammer-Ormet No. 1 and No. 2 138 kV Extension Project electronically filed by Tanner Wolffram on behalf of Ohio Power Company