

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of)	
GUERNSEY POWER STATION, LLC for a)	
Letter of Notification for the Guernsey Power)	Case No. 17-1828-EL-BLN
Station Electrical Interconnection in Guernsey)	
County, Ohio)	

JOINT APPLICATION TO BIFURCATE, CLARIFY, AND TRANSFER CERTIFICATE

Pursuant to Ohio Revised Code Section (“R.C.”) 4906.04, Guernsey Power Station, LLC (“GPS”) and Ohio Power Company (“AEP Ohio”) (collectively, the “Joint Applicants”) respectfully request approval to bifurcate the Letter of Notification Construction Certificate (“Certificate”) issued to GPS in the above-captioned proceeding effective December 8, 2017. Joint Applicants also request approval to transfer the portion of the Certificate for the 3-circuit breaker 765 kilovolt (“kV”) switching station (“Switchyard”) from GPS to AEP Ohio.

The proposed transfer of the Certificate related to the Switchyard was contemplated in the original Letter of Notification filing in this proceeding.¹ Transfer of the Switchyard is also contemplated and required under the unexecuted Interconnection Construction Service Agreement associated with PJM Queue #AB2-067/AC1-044 and filed pursuant to Federal Energy Regulatory Commission (“FERC”) order on May 24, 2019.² The Joint Applicants propose to transfer the Certificate related to the Switchyard to be effective when the Joint Applicants consummate the transfer of ownership of the Switchyard, which will occur after completion of construction and energization of the Switchyard.

¹ See Letter of Notification at 5 (Sept. 8, 2017); Staff Report at 3 (Dec. 1, 2017).

² *In re PJM Interconnection, L.L.C.*, Docket No. ER19-603-002, Compliance Filing of Original Service Agreement No. 5250, Queue No. AB2-067/AC1-044 (filed pursuant to May 10, 2019 FERC order in the same docket, 167 FERC ¶ 61,120).

Furthermore, the proposed transfer of the Certificate related to the Switchyard will provide the Ohio Power Siting Board (“Board”) the opportunity to harmonize the conditions applicable to the Switchyard and those applicable to AEP’s 765kV transmission lines entering the station. As the Board is aware, AEP Ohio Transmission Company, Inc. (“AEP Ohio Transco”), an affiliate of AEP Ohio, obtained a Certificate from the Board in Case No. 20-0788-EL-BLN for the construction of the 765kV transmission lines entering the Switchyard. Due the interrelated nature of the projects, it appears that Condition 7 in the Staff Report of Investigation in this case required GPS to propose a restoration plan for all transmission line crossings of Wills Creek, including AEP Ohio Transco’s transmission lines authorized in Case No. 20-0788-EL-BLN. In order to provide AEP Ohio Transco the opportunity to meet its restoration obligations related to the crossing of Wills Creek by the 765kV transmission lines in a manner consistent with its Certificate for those lines issued in Case No. 20-0788-EL-BLN, the Joint Applicants request that the Board approve the transfer of the Certificate in this case and specifically limit Condition 7 only to the Switchyard and the crossing of Wills Creek by the generator tie-in line from the Switchyard to the point of interconnection with GPS’s facilities. This harmonization and clarification of responsibilities will ensure that not only is restoration of Wills Creek completed by the party responsible for it, but it will ensure that there is no potential for regulatory confusion created by the overlapping nature of Condition 7.

Consistent with the policy of the State of Ohio, the Switchyard will continue to be subject to the jurisdiction of the Ohio Power Siting Board and the terms and conditions in the Certificate that are applicable to the Switchyard, as clarified by the Board in response to this motion, will remain in force. Furthermore, as required pursuant to R.C. 4906.04, upon transfer of the Switchyard from GPS, AEP Ohio agrees to abide by all the terms and conditions, as clarified by

the Board in response to this motion, of the Certificate applicable to the transferred Switchyard. In support of this Joint Application, the Joint Applicants are submitting correspondence confirming AEP Ohio's commitment to abide by any conditions applicable to the Switchyard as required by the December 1, 2017 Staff Report filed in this proceeding.³ GPS has also sent via overnight mail a letter this day to all public officials notifying them of the transfer request.⁴

WHEREFORE, the Joint Applicants respectfully request that pursuant to R.C. 4906.04, the Ohio Power Siting Board approve the bifurcation and future transfer of the Letter of Notification Certificate associated with the Switchyard to AEP Ohio upon transfer of the Switchyard from GPS to AEP Ohio. The Joint Applicants also request that the Certificate transfer requested herein be effective upon notice to the Board by the Joint Applicants that the transfer of Switchyard ownership has taken place.

Respectfully submitted,

/s/ Dylan F. Borchers (by CMB per authorization)

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/s/ Christen M. Blend

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Attorney for Ohio Power Company

³ See Exhibit A.

⁴ See Exhibit B.

EXHIBIT A

August 27, 2021

Ms. Tanowa Troupe
Administration/Docketing
Ohio Power Siting Board
180 East Broad Street, 11th Floor
Columbus, Ohio 43215-3793

RE: Case No. 17-1828-EL-BLN
Joint Application to Bifurcate, Clarify, and Transfer Certificate

Dear Ms. Troupe:

Effective December 8, 2017, a Letter of Notification Construction Certificate (“Certificate”) was granted to Guernsey Power Station, LLC (“GPS”) pursuant to Ohio Revised Code Chapter 4906 for the construction, operation, and maintenance of a 3-circuit breaker 765 kilovolt switching station (“Switchyard”).

GPS and Ohio Power Company (“AEP Ohio”) are requesting that the Certificate be bifurcated to separate out the Switchyard, clarified to harmonize the Switchyard Certificate conditions to be consistent with those applicable to the 765 kV transmission lines serving the Switchyard, approved in OPSB Case No. 20-0788-EL-BLN, and transferred from GPS to AEP Ohio after construction of the Switchyard is complete and GPS transfers ownership of the Switchyard to AEP Ohio. Once ownership of the Switchyard is transferred, it is the intent of AEP Ohio to adhere to all conditions related to the Switchyard set forth in the Staff Report issued December 1, 2017 in Case No. 17-1828-EL-BLN and clarified by the Board in response to the present request.

Thank you for considering this request and please contact me at 614-716-1915 with any questions.

Sincerely yours,



Christen M. Blend
Attorney for Ohio Power Company

EXHIBIT B



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_____, 2021

VIA UPS Ground

Name
Address
Address
Address

**Re: Joint Application to Bifurcate and Transfer Certificate
Guernsey Power Station, LLC/ Ohio Power Company
OPSB Case No. 17-1828-EL-BLN**

Dear :

The purpose of this letter is to make you aware of a joint application by Guernsey Power Station, LLC (“GPS”) and Ohio Power Company (“AEP Ohio”) to the Ohio Power Siting Board (“OPSB”) to bifurcate and transfer the Letter of Notification Construction Certificate (“Certificate”) that was issued to GPS to construct, own, and operate a 3-circuit breaker 765 kilovolt switching station (“Switchyard”) in Case No. 17-1828-EL-BLN. Switchyard construction has reached a point where GPS is ready to request to the OPSB that the Certificate for the Switchyard that will connect the project to the regional transmission grid be transferred to AEP Ohio. Accordingly, GPS and AEP Ohio have filed the enclosed application with the OPSB to transfer the Certificate associated with the Switchyard to AEP Ohio once ownership of the Switchyard itself is transferred from GPS to AEP Ohio.

Please contact me with any questions.

Sincerely,

Dylan F. Borchers

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing has been served upon the individuals listed via electronic mail, this 27th day of August, 2021.

dborchers@bricker.com

/s/ Christen M. Blend

Christen M. Blend

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

8/27/2021 9:19:28 AM

in

Case No(s). 17-1828-EL-BLN

Summary: Notice Joint Application to Bifurcate, Clarify, and Transfer Certificate electronically filed by Ms. Christen M. Blend on behalf of Ohio Power Company