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March 1, 2001

The Public Utilities Commission  
of Ohio  
Docketing Division  
180 East Broad Street  
Columbus, OH 43215

RE: **Monongahela Power Company,**  
**dba Allegheny Power**  
**Electric Transition Plan Filing**  
**Case No. 00-02-EL-ETP**

Dear Docketing Division:

Enclosed please find the *Transmission/Distribution Separation Filing of Monongahela Power Company* pursuant to the above-referenced case. Only one copy of Allegheny Power's map of major transmission facilities and Allegheny Power's system operating diagram (6 pages) is provided due to the volume and cost of reproduction.

Sincerely yours,

A handwritten signature in black ink, appearing to read "GARY A. JACK". Below the signature, the text "Gary A. Jack" and "Senior Attorney" is printed in a smaller font.

GAJ:tmw  
cc: Parties of Record

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**ENTRY Item (4), Part 1) –**  
**Discussion of Facilities and FERC's Seven-Factor Test**

**AP T&D Facilities Classification**

Allegheny Power (AP) is preparing to place control of its transmission facilities into the hands of the PJM Office of Interconnection before the end of 2001. This requires a simple identification of the facilities to be controlled; it neither affects ownership of electrical facilities nor requires changes in plant accounting.

Allegheny Power also is contemplating subsequent development of a wholly-owned Transmission Company (TRANSCO) that would own all of its present transmission assets. We presently believe that if there were such a transfer of asset ownership, any resulting net changes in plant accounting would be minor.

Allegheny Power believes that, if separation of existing assets into a TRANSCO is to be accomplished, the initial classification and valuation of transmission and distribution assets should be thorough, and that any subsequent reclassification of existing facilities should be minimized.

The ruleset developed for this purpose is intended to be comprehensive, in order to minimize the need for future changes. Nevertheless, circumstances could change (for example, the interconnection of a new wholesale generator), and require that certain facilities be reclassified. The rules that follow are intended to minimize the need for future reclassifications.

AP's ruleset is not designed or intended to change the existing balance of plant accounting. It is intended to identify facilities for initial PJM control, and possible TRANSCO ownership, and to ensure reliable transmission operation.

**FERC's Seven-Factor Test**

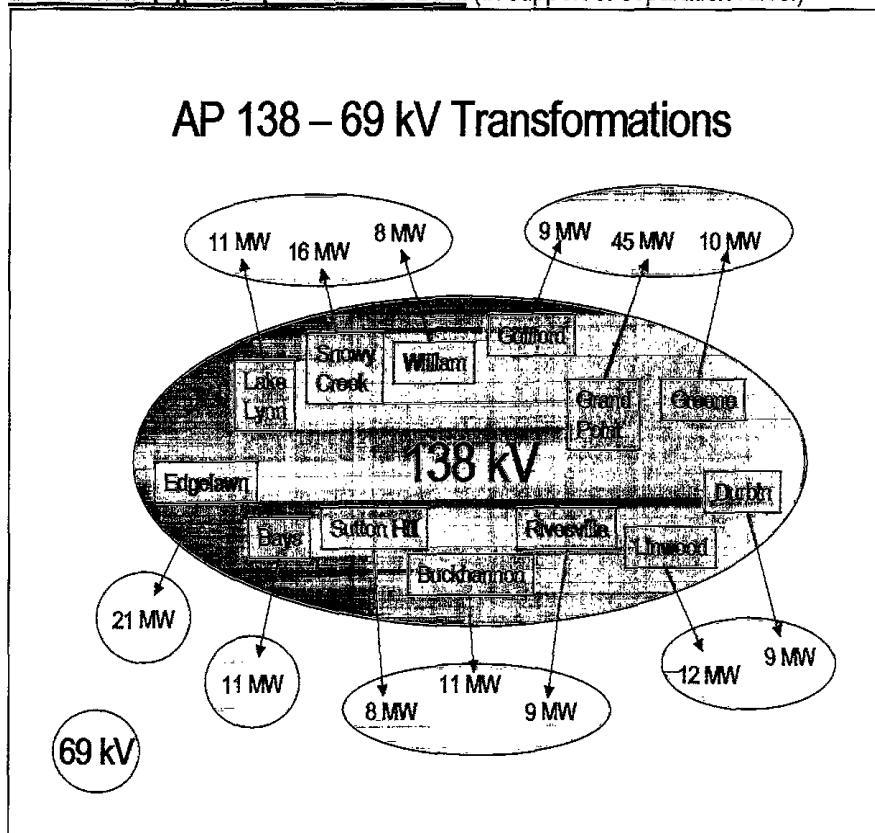
The FERC "Seven-Factor Test" (SFT) provides the overall distinction between distribution and transmission facilities. The SFT is general in nature, and clearly indicates that there can be exceptions to the general criteria. FERC has provided no guidance as to an acceptable range of interpretation of the general rules. Therefore, additional rules and definitions have been established to guide AP's classification decisions.

### **AP's T&D Separation Rules**

For the purpose of classifying AP's transmission and distribution facilities, the following additional rules apply.

- 1) Transmission voltages are defined as 100 kV and higher. There are some exceptions. (See Rules 4 and 5.)
- 2) Network substations are defined as those that are connected to three or more other network substations by lines operating at a transmission voltage.
- 3) A transmission line operates at transmission voltage and connects two or more network substations.
  - a) A transmission line can consist of multiple serial segments due to intervening substations that tap the transmission line to serve distribution load.
  - b) A transmission line can consist of three segments that connect three network substations at a junction point.
- 4) Lines and substation facilities that provide a path interconnecting the AP network with another are classified as transmission facilities, regardless of the operating voltage, and even if operated normally open.
- 5) Facilities providing the primary path to the transmission network to interconnect a generation source that produces power for the wholesale market are classified as transmission facilities, regardless of generating capacity or operating voltage.
- 6) Capacitors installed on transmission busses are transmission facilities. Radial lines operating at transmission voltages, and substations served by such radial lines, are transmission facilities if a shunt capacitor, or other reactive support device, operating at transmission voltage is present on the substation bus.
- 7) Transformers connecting voltage levels, both (or all) of which are transmission voltages, are transmission facilities. Transformers connecting transmission facilities to lower voltage levels do so for delivery of power to the distribution system, and are therefore distribution facilities.

ENTRY Item (4), Part 2 – Load-flow Data (In support of separation rules.)



#### Local Distribution Networks

This diagram is a transcription of the results of AP's 2000 Summer base case power flow study. (Results are tabulated in the following eight pages.) System conditions in the base case are normal, and all confirmed regional transactions are included.

[Lake Lynn / Snowy Creek / William], [Guilford / Grand Point / Greene], [Linwood / Durbin], and [Sutton Hill / Buckhannon / Rivesville] are all multiple supply points for local 69 kV networks. As the diagram shows, there are substantial power flows into each of these four local networks at every supply point; no power flows out. Operating experience confirms that the study results are correct, and are consistent with AP's design and operation of bulk power supply facilities serving local distribution. AP's local distribution networks are unaffected by regional power flows under normal operating circumstances. These facts verify that AP's proposed nomination of transmission and distribution facilities is consistent with FERC's "Seven Factor Test."

The transformations at Edgelawn and Bays are purely radial; that is, the 69 kV facilities in those areas have no other connections to the higher-voltage network.

**ENTRY Item (4), Part 2) – Load-flow Data**

PTI INTERACTIVE POWER SYSTEM SIMULATOR--PSS/E FRI, FEB 09 2001 13:20  
2000 SUMMER MON POWER WITH WVP AND SUBTRANSMISSION AREAS

OUTPUT FOR AREA 1 [APS A]

FROM BUS	NAME	BUS DATA			LINE DATA			TRANSFORMER RATIO	RATING A MW		
		AREA ZONE	VOLT PU/KV	ANGLE	GEN MW/MVAR	LOAD MW/MVAR	SHUNT MW/MVAR	TO BUS	NAME	CKT AREA	MW
8386 ALPINE 69.0 1 0.977 -37.8 0.0 0.0 2.7 0.0 0.0 8467 ALPINE T69.0 1 1 -2.7 -0.4 7 39											
8387 AMBOY 69.0 1 0.976 -37.2 0.0 0.0 2.0 0.0 0.0 8400 SNOW C 69.0 1 1 -2.4 1.6 8 37											
8388 BAYARD 69.0 1 0.975 -37.9 0.0 0.0 0.4 0.0 0.0 8403 WILLIAM 69.0 1 1 0.4 -2.5 7 37											
8389 BLACKNTR69.0 98 67.29 0.0 0.3 0.0 0.0 0.0 0.0 8401 STONY RT69.0 1 1 -2.0 -3.7 11 39											
8390 BUFF CL 69.0 1 0.978 -38.1 0.0 0.0 0.7 0.0 0.0 8466 N BRAN T69.0 1 1 1.5 3.4 10 39											
8391 CASCADE 69.0 1 0.959 -36.9 0.0 0.0 9.8 0.0 0.0 8403 WILLIAM 69.0 1 1 -2.0 -0.6 6 39											
8392 CHER RGT69.0 98 67.19 0.0 0.0 0.0 0.0 0.0 0.0 8401 STONY RT69.0 1 1 -1.5 4.3 11 41											
8393 CHER RG 69.0 1 0.972 -38.0 0.0 0.0 2.5 0.0 0.0 8402 STONY R 69.0 1 1 0.8 -4.3 11 41											
8394 GRANT CT69.0 98 67.09 0.0 0.0 0.0 0.0 0.0 0.0 8448 PRESCO 69.0 1 1 -9.8 -7.4 30 43											
8395 LAKE LYNN69.0 98 67.57 -35.7 0.0 0.0 0.0 0.0 0.0 8393 CHER RG 69.0 1 1 3.0 1.5 8 41											
8396 N BRAN 69.0 1 0.975 -37.9 0.0 0.0 0.0 0.0 0.0 8394 GRANT CR69.0 1 1 -1.1 -3.3 9 41											
8397 OAKLAND 69.0 1 0.974 -37.5 0.0 0.0 2.2 0.0 0.0 8456 GORMAN 69.0 1 1 -1.9 1.8 4 63											
8398 ROWLEB 69.0 1 0.962 -37.2 0.0 0.0 2.8 0.0 0.0 8392 CHER RGR69.0 1 1 -3.0 -1.5 8 41											
					8465 KUHN 69.0 1 1 0.5 0.3 2 41						
					8392 CHER RGT69.0 1 1 1.1 3.3 9 41						
					8466 N BRAN T69.0 1 1 -1.2 -3.3 9 41						
					8495 GRANT C 69.0 1 1 0.0 0.0 0 41						
					8067 LAKE LYN 138 72 90 -10.7 -4.5 0.995UN 34 35						
					8448 PRESCO 69.0 1 1 10.7 4.5 20 58						
					8466 N BRAN T69.0 1 1 -0.4 -0.2 1 39						
					8400 SNOW C 69.0 1 1 -5.8 0.5 15 39						
					8456 GORMAN 69.0 1 1 3.6 -1.3 10 39						
					8399 ROWLEB T69.0 1 1 -2.8 -1.4 8 41						

8399 ROWLEB	T69.0	1	0.966	-37.0	0.0	0.0	0.0	0.0	8398 ROWLEB	69.0	1	1	2.8	1.3		8	41
8400 SNOW C	69.0	1	0.976	-36.9	0.0	5.2	0.0	0.0	8400 SNOW C	69.0	1	1	-2.1	-4.0		8	58
	98	67.37			0.0	2.6			8448 PRESCO	69.0	1	1	-0.7	2.7		5	58
8401 STONY RT69.0	1	0.977	-37.9	0.0	0.0	0.0	0.0	-4.7	8118 SNOW C	138	1	90	-15.6	0.9	1.019UN	60	27
	98	67.38			0.0	0.0			8387 AMBOY	69.0	1	1	2.4	-1.7		8	37
									8397 OAKLAND	69.0	1	1	5.8	-0.7		15	39
									8399 ROWLEB	T69.0	1	1	2.1	3.7		8	58
8402 STONY R	69.0	1	0.979	-38.2	0.0	0.8	0.0	0.0	8388 BAYARD	69.0	1	1	2.0	3.6		1.1	39
	98	67.59			0.0	0.3			8390 BUFF CL	69.0	1	1	1.5	-4.4		12	41
8403 WILLIAM	69.0	1	0.981	-37.4	0.0	0.0	0.0	-4.5	8467 ALPINE	T69.0	1	1	-3.5	0.8		9	39
	98	67.67			0.0	0.0			8390 BUFF CL	69.0	1	1	-0.8	4.3		11	41
8404 ADRIAN	69.0	1	0.982	-35.5	0.0	0.2	0.0	0.0	8136 WILLIAM	138	2	90	-7.9	2.6	1.019UN	42	20
	99	67.79			0.0	0.1			8387 AMBOY	69.0	1	1	-0.3	2.3		6	37
									8389 BLACKWTR	69.0	1	1	2.0	0.5		6	39
									8467 ALPINE	T69.0	1	1	6.2	-0.6		16	39
8405 BUCKIAN	69.0	1	0.987	-35.3	0.0	0.0	0.0	0.0	8405 BUCKIAN	69.0	1	1	-4.1	-1.3		11	38
	99	68.12			0.0	0.0			8411 GAME FRM	69.0	1	1	3.9	1.2		11	38
8406 BURNSV	69.0	1	0.957	-36.8	0.0	5.1	0.0	0.0	8018 BUCKIAN	138	1	90	-10.6	-1.2	0.995UN	31	35
	99	66.06			0.0	2.3			8404 ADRIAN	69.0	1	1	4.1	1.2		11	38
									8407 CENTUR	69.0	1	1	-0.7	2.9		8	37
									8415 ROANOK	69.0	1	1	7.1	2.5		20	37
8407 CENTUR	69.0	1	0.984	-35.1	0.0	4.0	0.0	0.0	8410 FRAMET	T69.0	1	1	-0.6	-0.2		2	37
	99	67.91			0.0	3.1			8415 ROANOK	69.0	1	1	-4.5	-2.1		14	37
8408 ELK C	69.0	1	0.987	-34.8	0.0	0.5	0.0	0.0	8405 BUCKIAN	69.0	1	1	0.7	-3.1		9	37
	99	68.12			0.0	0.2			8408 ELK C	69.0	1	1	-4.7	0.0		13	37
8409 FRAMET	69.0	1	0.955	-36.9	0.0	2.8	0.0	0.0	8407 CENTUR	69.0	1	1	4.7	-0.1		14	37
	99	65.92			0.0	1.2			8412 LAMP PL	69.0	1	1	-5.2	-0.1		10	38
8410 FRAMET	T69.0	1	0.958	-36.7	0.0	0.0	0.0	0.0	8410 FRAMET	T69.0	1	1	-2.8	-1.2		8	38
	99	66.13			0.0	0.0			8406 BURNSV	69.0	1	1	0.6	-0.2		2	37
8411 GAME	FRM69.0	1	0.979	-35.7	0.0	3.9	0.0	0.0	8409 FRAMET	69.0	1	1	2.8	1.0		8	38
	99	67.56			0.0	1.3			8413 OTTER	69.0	1	1	-3.5	-0.9		10	38
8412 LAMP PL	69.0	1	0.998	-33.4	0.0	3.7	0.0	0.0	8404 ADRIAN	69.0	1	1	-3.9	-1.3		11	38
	99	68.84			0.0	0.3			8408 ELK C	69.0	1	1	5.3	-0.5		14	37

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8413 OTTER	69.0	1	0.958	-36.7	0.0	4.6	0.0	8414 RIVESVL	69.0	1	1	-9.0	4.7		27	37
8414 RIVESVL	69.0	1	0.998	-33.2	0.0	2.0	0.0	8410 FRAMET	T69.0	1	1	-3.5	0.9		10	38
	99	66.13				21.3	0.0	8416 SUTTN H	69.0	1	1	-8.1	-2.8		23	38
	99	68.84				4.4	0.0	8104 RIVESVL	138	10	90	-17.5	0.1		44	40
8415 ROANOK	69.0	1	0.968	-36.4	0.0	2.6	0.0	8412 LAMP PL	69.0	1	1	-12.8	0.2		64	20
	99	66.80				0.9	0.0	8405 BUCKEAN	69.0	1	1	-7.1	-4.7		27	37
8416 SUTTN H	69.0	1	0.965	-36.4	0.0	0.0	0.0	8406 BURNSV	69.0	1	1	4.5	1.9		21	37
	99	66.62				0.0	0.0	8123 SUTTN H	138	1	90	-8.1	-2.8		13	37
8448 PRESCO	69.0	1	0.962	-36.9	0.0	0.0	0.0	8413 OTTER	69.0	1	1	8.1	2.8	0.995UN	25	35
	98	66.38				0.0	0.0	8391 CASCADE	69.0	1	1	9.9	7.4		23	38
8456 GORMAN	69.0	1	0.973	-37.9	0.0	1.7	0.0	8395 LAKE LYNN	69.0	1	1	-10.6	-4.5		30	43
	98	67.16				0.8	0.0	8399 ROWLEB	T69.0	1	1	0.7	-2.9		21	58
8465 KUHN	69.0	1	0.972	-38.0	0.0	0.5	0.0	8392 CHER RG	T69.0	1	1	1.9	-1.9		5	58
	98	67.07				0.4	0.0	8397 OAKLAND	69.0	1	1	-3.6	1.1		10	39
8466 N BRAN T69.0	69.0	1	0.975	-37.9	0.0	0.0	0.0	8393 CHER RG	69.0	1	1	-0.5	-0.4		2	41
	98	67.25				0.0	0.0	8388 BAYARD	69.0	1	1	-1.5	-3.4		10	39
8467 ALPINE T69.0	69.0	1	0.978	-37.8	0.0	0.0	0.0	8394 GRANT CR	69.0	1	1	1.2	3.3		9	41
	98	67.46				0.0	0.0	8396 N BRAN	69.0	1	1	0.4	0.2		1	39
8495 GRANT C	69.0	1	0.974	-37.9	0.0	0.0	0.0	8386 ALPINE	69.0	1	1	2.7	0.3		7	39
	98	67.19				0.0	0.0	8401 STONY RR	69.0	1	1	3.5	-0.9		9	39
								8403 WILLIAM	69.0	1	1	-6.1	0.5		16	39
								8394 GRANT CR	69.0	1	1	0.0	0.0		0	41

## OUTPUT FOR AREA 92 [ELKINS ]

<=====>										<=====>									
FROM BUS		TO BUS		GEN MW/MVAR		LOAD MW/MVAR		SHUNT MW/MVAR		NAME		CKT AREA		MW		MVAR		TRANSFORMER RATIO	
AREA ZONE	NAME	VOLT PU/KV	ANGLE	MW	MVAR	P	Q	MW	MVAR					MW	MVAR				
8165 DURBIN	69.0	92	0.970	-37.5	0.0	0.4	0.0	0.0	0.0	8033 DURBIN	138	1	90	-9.4	2.5	0.958RG	28	35	
8166 FRANK	69.0	92	0.970	-37.9	0.0	0.2	0.0	8166 FRANK	69.0	1	92	7.0	-3.1	21	38				
8170 TSNER CK69.0	92	66.90	0.930	-37.2	0.0	4.3	0.0	8182 TROUT R	69.0	1	92	2.0	0.5	5	38				
8171 LINWOOD	69.0	92	0.985	-37.5	0.0	0.0	0.0	8165 DURBIN	69.0	1	92	-7.0	3.1	21	38				
8172 LOUGH S L69.0	92	67.96	0.938	-36.9	0.0	0.0	0.0	8174 MONTEREY69.0	1	92	2.8	0.7	8	38					
8173 MARL	69.0	92	0.976	-39.9	0.0	5.2	0.0	8172 LOUGHS L	69.0	1	92	-9.8	-4.2	30	38				
8174 MONTEREY69.0	92	67.34	0.961	-38.3	0.0	1.2	0.0	8071 LINWOOD	138	1	90	-12.1	5.2	1.019UN	35	38			
8177 SNOWS T	69.0	92	0.987	-38.2	0.0	0.0	0.0	8177 SNOWS T	69.0	1	92	12.1	-5.2	16	85				
8178 SNOWS	69.0	92	0.988	-38.3	0.0	2.7	0.0	8073 LOUGHS L	138	1	90	-14.2	-5.2	1.044UN	46	35			
8179 MARL T	69.0	92	0.986	-38.4	0.0	1.1	0.0	8170 TSNER CK69.0	1	92	9.8	4.2	30	38					
8180 THORN CT69.0	92	68.04	0.982	-38.9	0.0	0.0	0.0	8183 TYGART	69.0	1	92	4.4	1.0	13	38				
8181 THORN C	69.0	92	0.981	-38.9	0.0	0.0	0.0	8071 NEW BUS	69.0	1	89	3.0	-2.9	11	38				
8182 TROUT R	69.0	92	0.967	-37.7	0.0	0.6	0.0	8180 THORN CT69.0	1	92	-8.3	1.8	23	38					
8183 SNOWS T	69.0	92	0.987	-38.2	0.0	0.6	0.0	8179 MARL T	69.0	1	92	2.1	-3.7	7	63				
8184 SNOWS	69.0	92	0.988	-38.3	0.0	2.1	0.0	8166 FRANK	69.0	1	92	-2.7	-1.1	8	38				
8185 SNOWS T	69.0	92	0.987	-38.2	0.0	0.6	0.0	8177 SNOWS T	69.0	1	92	-2.1	3.7	7	63				
8186 SNOWS T	69.0	92	0.986	-38.4	0.0	0.0	0.0	8171 LINWOOD	69.0	1	92	-12.0	5.2	16	85				
8187 SNOWS	69.0	92	0.987	-38.2	0.0	0.0	0.0	8178 SNOWS	69.0	1	92	2.1	-3.7	7	63				
8188 SNOWS T	69.0	92	0.988	-38.3	0.0	0.6	0.0	8179 MARL T	69.0	1	92	9.9	-1.5	16	63				
8189 SNOWS T	69.0	92	0.987	-38.2	0.0	0.0	0.0	8173 MARL	69.0	1	92	-8.3	-1.9	23	38				
8190 SNOWS T	69.0	92	0.986	-38.4	0.0	0.0	0.0	8179 MARL T	69.0	1	92	-9.9	1.4	26	38				
8191 THORN C	69.0	92	0.981	-38.9	0.0	1.5	0.0	8181 THORN C	69.0	1	92	1.5	0.5	4	41				
8192 TROUT R	69.0	92	0.967	-37.7	0.0	2.0	0.0	8180 THORN CT69.0	1	92	-1.5	-0.6	4	41					
8193 SNOWS T	69.0	92	0.988	-38.3	0.0	0.7	0.0	8165 DURBIN	69.0	1	92	-2.0	-0.7	6	38				

8183	TYGART	69.0	92	0.925	-37.6	0.0	4.3	0.0	8172	LOUGHS	L69.0	1	92	-4.3	-1.3			13	38
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OUTPUT FOR AREA 96 [PARKERSB]

BUS DATA										LINE DATA									
FROM BUS	NAME	AREA	VOLT ZONE	PU/KV	ANGLE	GEN MW/MVAR	LOAD MW/MVAR	SHUNT MW/MVAR	TO NAME	CKT	AREA	MW	MVAR	TRANSFORMER RATIO	ANGLE	RATING A %I	MVA		
8292	EDGELAWN	69.0	96	0.966	-28.7	0.0	0.0	0.0	8036	EDGEJAWN	138	1	90	-21.2	-11.5	0.995UN	71	35	
8293	ELIZAB	69.0	96	0.932	-30.3	0.0	3.0	0.0	8484	MINERL	W69.0	1	96	21.2	11.5		56	44	
8312	PALESTIN	69.0	96	0.931	-30.4	0.0	3.0	0.0	8483	ELIZAB	T69.0	1	96	-3.0	-1.8		9	41	
8319	SLATE	69.0	96	0.937	-30.1	0.0	5.8	0.0	8318	SLATE	T69.0	1	96	2.8	0.9	0.975LK	42	8	
8482	SLATE T	69.0	96	0.939	-30.0	0.0	0.0	0.0	8482	SLATE T	69.0	1	96	-8.6	-3.4		22	44	
8483	ELIZAB T69.	96	96	0.933	-30.3	0.0	0.0	0.0	8319	SLATE	69.0	1	96	8.6	3.4		22	44	
8484	MINERL W69.	96	96	0.935	-30.3	0.0	0.0	0.0	8483	ELIZAB	T69.0	1	96	6.1	3.0		16	44	
8484	MINERL W69.0	96	96	0.956	-29.1	0.0	6.2	0.0	8484	MINERL	W69.0	1	96	-14.7	-6.4		38	44	
8484	MINERL W69.0	96	96	0.956	-29.1	0.0	4.7	0.0	8292	PALESTIN	69.0	1	96	3.0	1.7		9	41	
8484	MINERL W69.0	96	96	0.956	-29.1	0.0	4.7	0.0	8482	SLATE T	69.0	1	96	-6.0	-3.1		8	44	
8484	MINERL W69.0	96	96	0.959	-29.1	0.0	4.7	0.0	8482	SLATE T	69.0	1	96	14.8	6.6		16	44	

OUTPUT FOR AREA 97 [SOUTHERN]

BUS DATA										LINE DATA									
FROM BUS	NAME	AREA	VOLT ZONE	PU/KV	ANGLE	GEN MW/MVAR	LOAD MW/MVAR	SHUNT MW/MVAR	TO NAME	CKT	AREA	MW	MVAR	TRANSFORMER RATIO	ANGLE	RATING A %I	MVA		
8345	BAYS	69.0	97	0.929	-37.0	0.0	2.4	0.0	8009	BAYS	138	1	90	-10.9	-5.1	1.024UN	65	20	
8351	BROOKS R69.	97	97	0.921	-37.4	0.0	5.5	0.0	8365	JULIAN	69.0	1	97	8.5	4.0		16	63	
8365	JULIAN	69.0	97	0.922	-37.4	0.0	2.9	0.0	8365	JULIAN	69.0	1	97	-5.5	-2.1		10	63	
8365	JULIAN	69.0	97	0.922	-37.4	0.0	2.9	0.0	8345	BAYS	69.0	1	97	-8.4	-4.1		16	63	

8351 BROOKS R69.0 1 97 5.5 2.1 10 63

PTI INTERACTIVE POWER SYSTEM SIMULATOR--PSS/E FRI, FEB 09 2001 14:26  
2000 SUMMER MON POWER WITH WVP AND SUBTRANSMISSION AREAS

BUS DATA						LINE DATA							
FROM BUS	NAME	AREA ZONE	VOLT PU/EV	LOAD MW/MVAR	SHUNT MW/MVAR	TO BUS	NAME	CKT AREA	MW	MVAR	TRANSFORMER RATIO	RATING A	ANGLE & I MVA
8105 RIVESVL	11.5	90	1.053	-23.4	80.0	0.0	0.0	8104 RIVESVL	138	8	90	80.0	33.8
8106 RIVESVL	13.8	90	1.040	-27.3	53.0	0.0	0.0	8104 RIVESVL	138	10	90	53.0	33.8

PTI INTERACTIVE POWER SYSTEM SIMULATOR--PSS/E      FRI, FEB 09 2001    14:55  
 2000 SUMMER BASE - P.E. LOAD = 2600 MW - 12-20-99

OUTPUT FOR AREA 1 [APS A] DE AREA

<----->							LINE DATA							TRANSFORMER RATING A					
FROM	BUS	NAME	AREA	VOLT	ZONE	PU/KV	ANGLE	GEN	LOAD	SHUNT	TO	NAME	CKT AREA	MW	MVAR	RATIO	ANGLE	%I	MVA
375	CREE	69.0	1	0.963	-74.5	0.0	45.0	0.0	0.0	404	GRANDPO169.0	1	1	-45.0	-14.8				
404	GRANDPO169.0	1	0.972	-74.2	0.0	0.0	0.0	0.0	0.0	64	01GRANDP	138	1	1	-45.1	-15.1	0.956UN	55	
406	GREENE	69.0	1	0.980	-72.1	0.0	0.0	0.0	0.0	375	CREE	69.0	1	1	45.1	15.1		90	
408	GUILFORD69.0	1	0.985	-71.9	0.0	0.0	0.0	0.0	0.0	65	01GREENE	138	1	1	-10.3	-2.1	0.956UN	32	
487	ROUTE 3069.0	1	0.980	-72.3	0.0	6.2	0.0	0.0	0.0	493	SALEM	69.0	1	1	10.3	2.1		34	
493	SALEM	69.0	1	0.979	-72.4	0.0	12.6	0.0	0.0	66	01GUILF	138	1	1	-8.5	-4.2	0.956UN	30	
561	OAKLAND	69.0	1	0.961	-34.6	0.0	2.1	0.0	0.0	487	ROUTE 3069.0	1	1	8.5	4.2		32		
562	GORMAN	69.0	1	0.960	-34.7	0.0	0.7	0.0	0.0	8401	ST RIV	T69.0	1	1	6.1	1.5		11	
8386	ALPINE	69.0	1	0.961	-35.0	0.0	3.2	0.0	0.0	8402	ST RIV	T69.0	1	1	3.2	2.3		85	
8387	AMBOY	69.0	1	0.967	-34.3	0.0	2.2	0.0	0.0	8403	WILLIAM	69.0	1	1	-6.4	-2.3		11	
8388	BAYARD	69.0	1	0.957	-35.1	0.0	0.4	0.0	0.0	8400	SNOWY	CK69.0	1	1	-8.2	-2.2		19	
8389	BLACKWTR69.0	1	0.966	-34.9	0.0	2.0	0.0	0.0	0.0	561	OAKLAND	69.0	1	1	-6.1	-1.6		38	
8390	BUFFALO	69.0	1	0.957	-35.2	0.0	1.1	0.0	0.0	8392	CHR RG	T69.0	1	1	4.1	0.1		7	
8391	CASCADE	69.0	1	0.968	-33.4	0.0	10.9	0.0	0.0	8401	ST RIV	T69.0	1	1	3.2	2.3		38	
							2.5	0.0	0.0	8403	WILLIAM	69.0	1	1	-2.0	-0.6		6	
								0.6	0.0	8403	WILLIAM	69.0	1	1	-5.3	0.9		38	
									0.0	8403	WILLIAM	69.0	1	1	3.1	-1.9		38	
									0.2	0.0	8396	N BRANCH	69.0	1	1	0.4	1.9		6
									0.0	0.0	8401	ST RIV	T69.0	1	1	-0.8	-2.1		41
									0.0	0.0	8402	STONY	RV69.0	1	1	1.3	0.4		3
									0.0	0.0	8395	LAKE LYNN69.0	1	1	-14.7	-1.5		41	

8392	CHR RG T69.0	1	0.957	-35.1	0.0	0.0	0.0	0.0	8399 RWLSBG T69.0	1	1	3.8	-1.0
		10	66.01		0.0	0.0	0.0	0.0	562 GORMAN	69.0	1	-4.1	-0.3
									8393 CHERRY RG69.0	1	1	3.7	2.1
									8394 GRANT PC69.0	1	1	0.0	0.0
									8396 N BRANCH69.0	1	1	0.3	-1.7
												5	38
8393	CHRRY RG69.0	1	0.955	-35.1	0.0	3.7	0.0	0.0	8392 CHR RG r69.0	1	1	-3.7	-2.1
		10	65.88		0.0	2.1	0.0	0.0	8392 CHR RG r69.0	1	1	-3.7	-2.1
8394	GRANT PC69.0	1	0.957	-35.1	0.0	0.0	0.0	0.0	17 OILK LYN 138	1	1	-14.8	-1.6
		10	66.01		0.0	0.0	0.0	0.0	8391 CASCADE 69.0	1	1	14.8	1.6
8395	LAKE LYN69.0	1	0.982	-31.7	0.0	0.0	0.0	0.0	8388 BAYARD	69.0	1	-0.4	-1.9
		10	67.77		0.0	0.0	0.0	0.0	8392 CHR RG r69.0	1	1	-0.3	1.7
8396	N BRANCH69.0	1	0.957	-35.1	0.0	0.7	0.0	0.0				5	38
		10	66.03		0.0	0.2	0.0	0.0				5	38
8398	ROWLESBG69.0	1	0.964	-34.0	0.0	4.1	0.0	0.0	8399 RWLSBG T69.0	1	1	-4.1	-0.9
		10	66.49		0.0	0.9	0.0	0.0	8391 CASCADE 69.0	1	1	-3.8	0.8
8399	RWLSBG T69.0	1	0.968	-33.8	0.0	0.0	0.0	0.0	8398 ROWLESBG69.0	1	1	4.1	0.8
		10	66.77		0.0	0.0	0.0	0.0	8387 AMBOY	69.0	1	5.3	-1.0
8400	SNOWY CK69.0	1	0.971	-33.8	0.0	5.3	0.0	0.0	8399 RWLSBG T69.0	1	1	-0.3	-1.6
		10	67.00		0.0	2.6	-4.7	242 01SNWY C 138	1	1	-19.2	-0.1	
8401	ST RIV T69.0	1	0.958	-35.1	0.0	0.0	0.0		561 OAKLAND 69.0	1	1	8.2	2.1
		10	66.10		0.0	0.0	0.0		8387 AMBOY	69.0	1	5.3	-1.0
8402	STONY RV69.0	1	0.956	-35.2	0.0	1.3	0.0	0.0	8390 SNOWY CK69.0	1	1	0.3	1.2
		10	65.99		0.0	0.4	0.0	0.0	8386 ALPINE	69.0	1	-3.2	-2.4
8403	WILLIAM 69.0	1	0.967	-34.8	0.0	0.0	0.0	0.0	8388 BAYARD	69.0	1	0.8	2.1
		10	66.73		0.0	0.0	0.0	0.0	8390 BUFFALO	69.0	1	2.3	0.3
									8390 BUFFALO	69.0	1	-1.3	-0.4
												3	41
									-4.6	263 01WILLIA 138	1	-5.4	0.3
									8386 ALPINE	69.0	1	6.4	2.2
									8387 AMBOY	69.0	1	-3.0	1.6
									8389 BLACKWTR69.0	1	1	2.0	0.5

**ENTRY Item (4), Part 3) – Maps**

- Allegheny Power's map, "MAJOR TRANSMISSION FACILITIES – As of December 31, 2000", is provided as an attachment. It is a geographic representation of key regional facilities, including AP's electrical facilities down to the 69 kV level.
- AP's "SYSTEM OPERATING DIAGRAM" also is attached. This six-page schematic diagram represents AP's high-voltage electrical facilities and key facilities of systems surrounding AP. The diagram has been color-enhanced to illustrate AP's proposed nomination of transmission facilities.

Transmission facilities are colored green. Distribution facilities, and facilities owned by others are black. The names of substations whose operation will be controlled by PJM (and that might be transferred to a TRANSCO) are highlighted in green. Those substations that would remain under the ownership of the distribution company, but contain transmission facilities, are highlighted in yellow. The names of substations owned by others are not highlighted.

**ENTRY Item (4), Part 4 – Accounting Decisions, Specific Accounts, and Cost Separations**

**Accounting Decisions**

The book value of AP's transmission and distribution facilities in Ohio, as presently allocated by accounts, is summarized in the table below. Even though it is premature to be making a thorough cost separation (owing to the fact that ownership by a TRANSCO is a consideration yet to be concluded), an estimate of the value of facilities that might be transferred is included.

AP currently views the possible transfer of transmission facilities ownership to a TRANSCO in terms of transferring each line and substation in its entirety. Certain substations that would be transferred include distribution facilities. Certain substations that would remain with the distribution company include transmission facilities. In these cases there would be an arrangement for leasing pertinent facilities from one company to the other in order to provide appropriate allocation of costs.

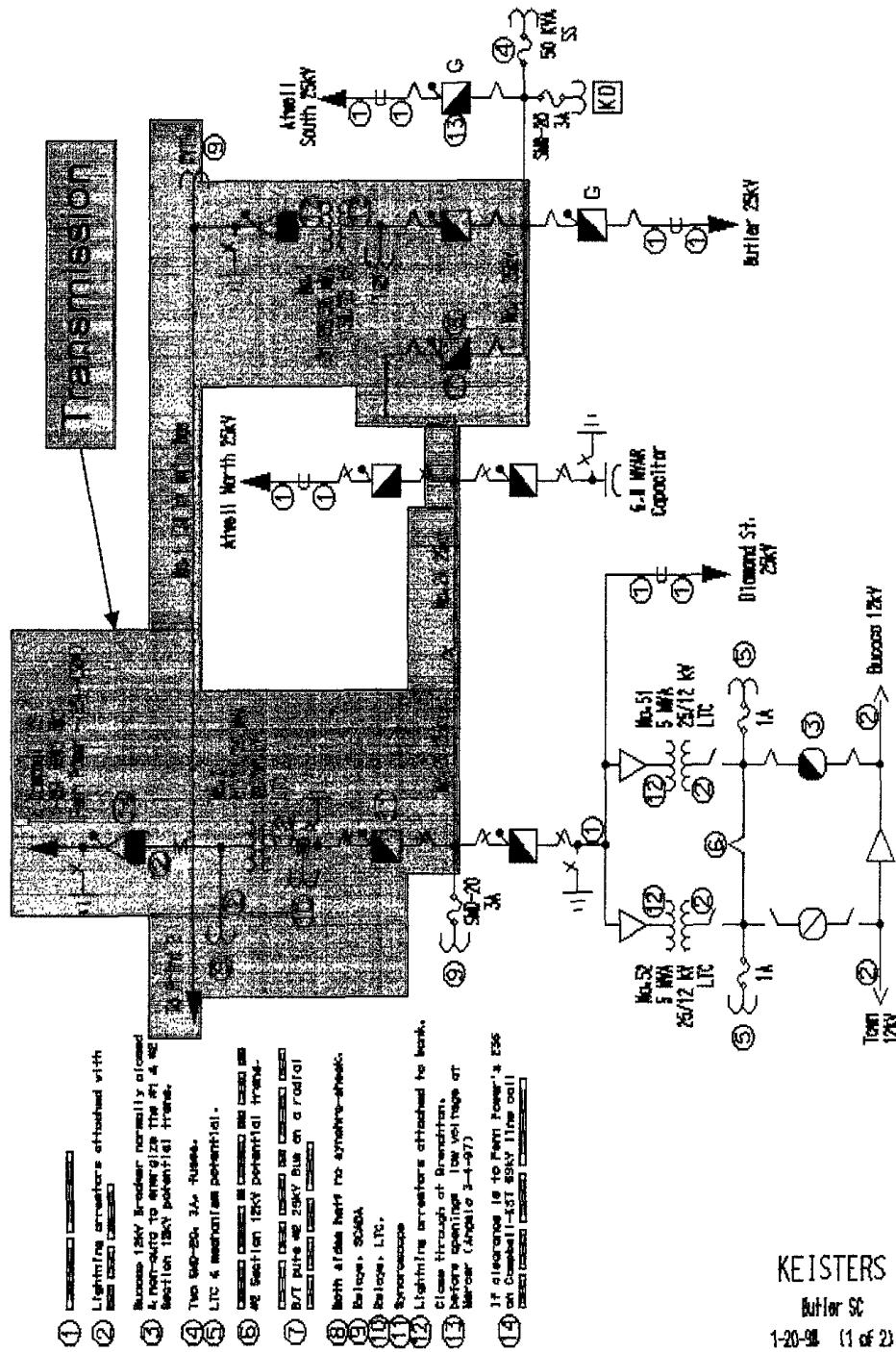
Substations that include both transmission and distribution facilities present an accounting challenge to ownership transfers and the lease-back concept. Accounting records, particularly for older facilities, do not permit a high degree of resolution of the costs represented by the items of hardware in a substation. It would be very taxing to examine the common facilities in every substation (control building, battery, fence, lighting, etc.) and develop a precise separation of costs. AP proposes to classify substations as, for example, 80/20 (80% transmission, 20% distribution), 70/30, etc. This is about the limit of resolution of accounting records. Using good judgment and applying percentages in moderate increments should facilitate the process of cost separation if it ever becomes necessary to implement a transfer of ownership and partial lease-back.

**Cost Separations – Ohio**

Asset Type	Current Book Value (\$000)		Value if Assigned to a TRANSCO (\$000)		Net Change to Transmission
	Transmission	Distribution	Transmission	Distribution	
Substations	\$5,016	\$6,984	\$4,768	\$7,232	(\$248)
Lines	\$6,556	\$0	\$6,461	\$95	(\$95)

The net change in T&D accounts due to a possible transfer of assets to a TRANSCO is estimated to be approximately \$343,000, which is 1.8% of the current book value of all AP T&D assets in Ohio. This small shift from transmission to distribution would result from application of the FERC Seven Factor Test and AP's asset classification ruleset.

**ENTRY Item (4), Part 5) – Other Justification**



**ENTRY Item (4), Part 5 – Other Justification**

The substation diagram above is an illustration of AP's T&D Separation Rule #4, "*Lines and substation facilities that provide a path interconnecting the AP network with another are classified as transmission facilities, regardless of the operating voltage, and even if operated normally open.*" The facilities highlighted in green above would be nominated as transmission.

The AP and Penn Power transmission networks are interconnected at Keisters SS. The transmission path is through the Keisters 138-25 kV transformer, a portion of the 25 kV bus, and then through the 25-69 kV transformer.

Although there are other low-voltage paths elsewhere that interconnect AP with neighboring companies, all those paths have a negligible response to regional power flows. The Keisters path is moderately responsive, and occasionally has figured in transfer constraints. Network reconfiguration is usually sufficient to alleviate any operating security problems that occur at Keisters.

Facilities in substations that interconnect wholesale generators to the AP transmission network by way of a lower-voltage path would be nominated as transmission in a manner analogous to the separation illustrated for Keisters.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing ***Transmission/Distribution Separation Filing of Monongahela Power Company*** was served on or about the 1<sup>st</sup> day of March, 2001, via e-mail upon the following:

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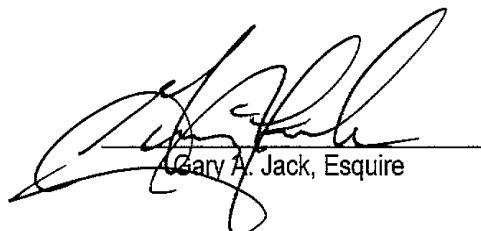
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