

OPSB STAFF REPORT OF INVESTIGATION

Case Numbers: 16-1593-EL-BTA
16-1594-EL-BTA
16-1595-EL-BTA

Project Name: Amendments to the Hayes-West Fremont
138 kV Transmission Line Project

Project Location: Sandusky and Erie counties

Applicant: American Transmission Systems, Inc.

Application Filing Date: July 29, 2016

Inspection Date: September 23, 2016

Report Date: October 27, 2016

Waiver Requests: None

Staff Assigned: J. O'Dell and J. Cross

Summary of Staff Recommendations (see discussion below):

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

Project Description

American Transmission Systems, Inc. (Applicant or ATSI) is proposing to amend its certificate in case number 12-1636-EL-BTX, the Hayes-West Fremont 138 kilovolt (kV) Transmission Line Project. ATSI has filed three separate amendments addressing their original case. Staff believes that its findings and recommendations for these amendments are best combined into one staff report. Staff's intention is to facilitate the Board's review and to simplify public participation.

In case number 16-1593-EL-BTA, the Applicant seeks authorization to install a second 138 kV circuit onto the open arm position of the same structures that would be installed for the Hayes-West Fremont Line. While the Applicant did not request to install a second 138 kV circuit during the original review process, the potential for a second future circuit was discussed in ATSI's application. Also, the Applicant's original design did provide for the potential installation of a future second circuit. The Applicant anticipates an additional cost of \$9,000,000 to install the proposed second circuit.

In the second and third amendments (case numbers 16-1594-EL-BTA and 16-1595-EL-BTA), the Applicant proposes adjustments to the certificated alignment. All of the adjustments result from property owner requests to the Applicant. The amendments are located in Sandusky, Riley, Townsend, and York townships in Sandusky County and Groton and Perkins townships in Erie County.

Basis of Need

The Applicant states the project is needed to maintain reliability following contingency events. Without the addition of the addition of the Hayes-West Fremont second circuit, the Applicant would be unable to comply with the required North American Electric Reliability Corporation and PJM planning criteria, making the system unstable and unreliable, and resulting in possible penalties from the Federal Energy Regulatory Commission. The additional circuit would allow the transmission system to provide safe, reliable electric service, while meeting all the applicable planning criteria.

The PJM Regional Transmission Explanation Plan (RTEP) process¹ revealed system overloads. This proposed project was identified as a baseline upgrade in the 2015 PJM RTEP and approved by the PJM Board of Directors.² ATSI's project was assigned ID No. b2560. The status of the project can be tracked on PJM's website.³

Nature of Impacts

Land Use

Potential impacts on land use were previously reviewed during the certification process for the Applicant's facility. The proposed route adjustments are not expected to significantly alter existing land use. The vast majority of the adjustments are in existing agricultural fields or on small stretches of vacant land. The adjustments are designed to reduce land use conflicts by avoiding underground infrastructure such as gas lines and drainage tiles. Additionally, individual property owners would be able to more efficiently develop their land and avoid potential undesirable land bisection. The adjustments are also expected to aid future farming operations by minimizing impacts to established cultivating patterns.

Ecological Impacts

Ecological impacts were also evaluated in the Applicant's original application. The proposed alignment adjustments are not expected to increase impacts to ecological features such as threatened or endangered species, wetlands, streams, ponds, or woodlots. No significant increase in overall vegetative clearing is expected.

Proposed Route Adjustments

In case number 16-1594-EL-BTA, the Applicant proposes three alignment adjustments. Adjustment 1 occurs entirely in agricultural land in the vicinity of the Hayes Substation. This adjustment results from more detailed engineering studies. An alignment shift of 10 feet allows the Applicant to adjust the line to provide proper clearances when crossing under existing transmission lines. Adjustment 2 allows for the removal of a structure that was intended to be

¹ PJM Interconnection, LLC is the regional transmission organization charged with planning for upgrades to the regional transmission system in Ohio. PJM annually issues an RTEP report which analyzes reliability criteria, operational performance of the transmission system, and economic and environmental factors. The RTEP provides for the construction of expansions and upgrades of the PJM transmission system, as needed to maintain compliance with reliability criteria and, when appropriate, to enhance the economic and operational efficiency of wholesale electricity markets in the PJM region.

² "2015 RTEP Regional Transmission Expansion Plan," PJM Interconnection, accessed October 24, 2016,

<http://pjm.com/planning.aspx>.

³ "Transmission Construction Status," PJM Interconnection, accessed October 24, 2016, <http://pjm.com/planning/rtep-upgrades-status/construct-status.aspx>.

placed in the center of a farm field. Adjustment 3 would avoid placing three light angle structures and associated guying in agricultural fields.

In case number 16-1595-EL-BTA, ATSI proposes seven specific alignment adjustments and a small change adjacent to the Ohio Turnpike/I-80. The affected easements have all been agreed to by the property owners. Adjustment 1 and Adjustment 2 occur entirely on agricultural land. These adjustments avoid bisection of the properties and/or existing drain tiles. Adjustment 3 would allow the Applicant to avoid an existing gas transmission corridor. Adjustment 4 removes a corner dead-end structure away from a collection of drainage pipes and a drainage collection area. Adjustment 5 removes a two-pole guyed structure out of a farm field. Adjustment 6 reduces the number of angled structures in an agricultural field. This change also allows for the removal of existing electric distribution poles, as the distribution wires would be relocated to the transmission structures. Adjustment 7 allows for the elimination of one dead-end structure on a commercial property.

In addition to the seven specific route adjustments, the Applicant proposes a slight shift in the 5.4-mile centerline that follows along the northern side of the Ohio Turnpike/I-80. This shift allows for greater required clearance away from the turnpike fence.

Conclusion

Staff's review of the applications included consideration of the requirements listed in Ohio Revised Code Section 4906.10. Based on Staff's review, the applications meet the necessary criteria for granting a certificate. Staff would require the Applicant to conform to conditions of the original certificate in order to best protect social and ecological resources associated with this project. Staff recommends approval of these amendment applications, provided that the following condition is satisfied.

Condition

- (1) The Applicant shall adhere to all applicable conditions as certificated in case number 12-1636-EL-BTX, except as specifically modified through these amendment applications.

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