

**In the Matter of the Letter of Notification Application)
by AEP Ohio Transmission Company for a Certificate)
of Environmental Compatibility and Public Need for) Case No. 18-0872-EL-BLN
the Heppner-Rhodes Adjustment Project)**

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| Chairman, Public Utilities Commission | Ohio House of Representatives |
| Director, Development Services Agency | Ohio Senate |
| Director, Department of Health | |
| Director, Department of Agriculture | |
| Director, Environmental Protection Agency | |
| Director, Department of Natural Resources | |
| Public Member | |

Please review the attached Staff Report of Investigation, which has been filed in accordance with Ohio Power Siting Board (Board) rules. The accelerated certificate application in this case is subject to an automatic approval process as required by Ohio Revised Code (R.C.) 4906.03 and Ohio Administrative Code 4906-6.

Please present any concerns you or your designee may have with this case to my office at least four business days prior to June 29, 2018, which is the automatic approval date.

Rustan

18-0872-EL-BLN
Staff Report of Investigation

OPSB STAFF REPORT OF INVESTIGATION

Case Number: 18-0872-EL-BLN
Project Name: Heppner-Rhodes Adjustment Project
Project Location: Jackson County
Applicant: AEP Ohio Transmission Company
Application Filing Date: May 31, 2018
Filing Type: Expedited Letter of Notification
Inspection Date: June 13, 2018
Report Date: June 22, 2018
Recommended Automatic Approval Date: June 29, 2018
Applicant's Waiver Requests: none
Staff Assigned: J. Pawley, J. Cross, G. Zeto

Summary of Staff Recommendations (see discussion below):

Application: ☐ Approval ☐ Disapproval ☒ Approval with Conditions

Waiver: ☐ Approval ☐ Disapproval ☒ Not Applicable

Project Description

AEP Ohio Transmission Company (Applicant) proposes to adjust approximately 1,050 feet of the previously approved Heppner-Rhodes 138 kilovolt (kV) transmission line (see Case No. 17-0807-EL-BLN, auto-approved on February 13, 2018). The project is located in Coal Township, Jackson County. The Applicant is in the process of securing easements necessary to construct and operate the adjusted alignment. The adjusted segment would be located on the west side to the Poston-Lick transmission line, instead of the previously approved location on the east side.

The proposed project involves the installation of new steel 3-pole and 2-pole H-frame structures, as well as 138 kV conductors and associated equipment, to be located within a 100-foot right-of-way. The additional cost associated with this adjustment is estimated to be approximately \$400,000. The Applicant proposes to begin construction of the Heppner-Rhodes line in the fall of 2018, with an in-service date of May 2019.

Basis of Need

This adjustment to the Heppner-Rhodes transmission line addresses engineering design clearance requirement parameters that were discovered after the initial approval of the Heppner-Rhodes line. Essentially, the Heppner-Rhodes transmission line needs to cross under the existing Poston-Lick transmission line at a point further north along the Poston-Lick line as originally approved. The Applicant has proposed this adjustment as a method to accommodate the necessary clearances between the Heppner-Rhodes transmission line and the adjacent Poston-Lick line.

The proposed adjustment is part of the originally approved project which was included in the Applicant's most recent Long-Term Forecast Report filing in Case No. 18-1501-EL-FOR and was submitted to PJM as a supplemental project. PJM assigned the project upgrade ID No. s1342. The construction status of the transmission project can be tracked on PJM's website.^{1, 2}

Nature of Impacts

Socioeconomic

The Applicant indicates that no land within the newly proposed transmission line right-of-way is registered as agricultural district land with Jackson County, and the project site does not contain any active agricultural row crop land. No occupied residences are located within 100 feet of the proposed right-of-way, and no wildlife management areas or nature preserve lands are located within 1,000 feet of the proposed right-of-way.

Land use in the vicinity of the project consists of warehouses and businesses associated with the Wellston Industrial Park, and nearby electrical substations (existing and under construction).

Cultural Resources

The Applicant's cultural resources consultant performed a literature review and Phase I cultural resource management investigation (for archaeology and history/architecture) for the original Heppner-Rhodes transmission line project in September 2017. The Applicant's consultant completed an addendum cultural resources management investigation in April and May 2018 to encompass the route revisions proposed in this case. The Applicant's consultant determined that this project would not involve or impact any significant cultural resources or landmarks, and that no further cultural resource management work was considered to be necessary. The findings were submitted to the Ohio Historic Preservation Office (OHPO). The OHPO responded to the consultant in concurrence that this project would not affect historic properties on May 24, 2018.

Surface Waters

The survey corridor contains one ephemeral stream. No structures would be located in streams. No in-water work is planned for this project, and no permanent impacts are anticipated. The proposed transmission line would not cross a 100-year floodplain.

The survey corridor contains one category 2 wetland. No wetland fill is proposed for this project. Further details about how the wetland would be protected from indirect construction stormwater impacts using erosion and sedimentation controls would be outlined in the Applicant's Stormwater Pollution Prevention Plan to be submitted as part of the required National Pollutant Discharge Elimination System permit.

Threatened and Endangered Species

Some tree clearing would be required for this project. The project area is within the range of state and federal endangered Indiana bat (*Myotis sodalis*) and the federal threatened northern long-eared bat (*Myotis septentrionalis*). As tree roosting species in the summer months, the habitat of these

1. AEP Ohio Transmission Company, "Long-Term Forecast Report to the Public Utilities Commission of Ohio," Public Utilities Commission of Ohio Case No. 18-1501-EL-FOR, May 31, 2018.

2. PJM Interconnection, "Transmission Construction Status," accessed June 7, 2018, <http://pjm.com/planning/rtep-upgrades-status/construct-status.aspx>.

species would be impacted by the project. In order to avoid impacts to the Indiana bat and northern long-eared bat, Staff reiterates the recommendation that the Applicant adhere to seasonal tree cutting dates of October 1 through March 31 for all trees three inches or greater in diameter, unless coordination efforts with the Ohio Department of Natural Resources and the U.S. Fish and Wildlife Service allows a different course of action. The proposed adjustment is expected not to impact any bat hibernacula.

Due to no proposed in-water work and a lack of suitable habitat, impacts to other state and federal listed species are not anticipated.

Conclusion

Staff's review of the application included consideration of the requirements listed in R.C. 4906.10. Based on Staff's review, the application meets the necessary criteria for granting a certificate. Staff recommends automatic approval of this case on June 29, 2018, provided that the following condition is satisfied.

Condition:

1. The Applicant shall adhere to all conditions of the Letter of Notification for the Heppner-Rhodes project in case number 17-0807-EL-BLN as modified by this application.

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6/22/2018 12:06:44 PM

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Case No(s). 18-0872-EL-BLN

Summary: Staff Report of Investigation electronically filed by Adam Bargar on behalf of Staff of OPSB