

BEFORE THE POWER SITING BOARD OF THE STATE OF OHIO

In the Matter of the Application of AEP Ohio)
Transmission Company for an Amendment to the Pine) **Case No. 19-2124-EL-BTA**
Ridge Switch-Heppner 138 kV Transmission Line)
Rebuild Project)

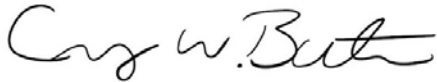
Members of the Board:

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	

To the Honorable Power Siting Board:

Please review the attached Staff Report of Investigation, which has been filed in accordance with Ohio Power Siting Board rules. The application in this case is subject to an approval process as required by Section 4906.03 of the Ohio Revised Code.

Respectfully submitted,



Craig Butler
Executive Director
Ohio Power Siting Board

OPSB STAFF REPORT OF INVESTIGATION

Project Name: Amendment to the Pine Ridge Switch-Heppner 138 kV Transmission Line Rebuild Project
Case Number: 19-2124-EL-BTA
Project Location: Jackson County
Applicant: AEP Ohio Transmission Company
Application Filing Date: December 20, 2019
Inspection Date: January 24, 2020
Report Date: April 20, 2020
Applicant's Waiver Requests: None
Staff Assigned: J. Pawley, R. Holderbaum

Summary of Staff Recommendations (see discussion below):

Application: ☐ Approval ☐ Disapproval ☒ Approval with Conditions

Waiver: ☐ Approval ☐ Disapproval ☒ Not Applicable

Application Description and Need

AEP Ohio Transmission Company (Applicant or AEP Ohio Transco) is proposing an amendment to the Pine Ridge Switch-Heppner 138 kilovolt (kV) Transmission Line Rebuild Project, which was approved by the Ohio Power Siting Board on February 21, 2019, in Case No. 18-0031-EL-BTX. Proposed adjustments are proffered by the Applicant following final detailed engineering and property owner discussions during right-of-way negotiations for the approved route. The type of transmission equipment would not change. The Applicant states that the economic impact would not change as a result of these adjustments. The need for the facility and grid impacts associated with the facility remain the same as was approved in Case No. 18-0031-EL-BTX.

Revisions requested in this amendment were placed by the Applicant into the category of engineering adjustments within the existing right-of-way. There is one instance of an alignment reroute. Construction has not yet begun on this project.

Engineering Adjustments

There are four segments of proposed engineering adjustments to the approved route. The proposed engineering adjustments include structure locations 164-165, 169-171, 174-176, and 178-183. The structure location shifts range from 8 to 33 feet from the previously approved preferred centerline. The Applicant states that all engineering adjustments would occur within the 100-foot right-of-way of the approved alignment.

Structures 164-165: The Applicant is proposing a shift of structure locations 164-165 approximately 10 feet northeast of the originally approved centerline. These shifts are proposed in order to place the structures on more favorable terrain for access and constructability.

Structures 169-171: The Applicant is proposing a shift of structure location 169 by approximately 33 feet to the north and west of the originally approved centerline. This shift would avoid sloped terrain which would have made the installation of the structure more difficult. The Applicant also proposes to remove structure location 170 from the west side of State Route 35, as that structure also would have been located on unfavorable terrain and access would have been restricted. Structure 170 is now proposed to be located east of State Route 35, roughly 600 feet further along the centerline in an open field, improving the access for construction and future maintenance. As a result of these adjustments, structure location 171 would shift approximately 10 feet southwest of the approved centerline in order to retain tangent structure alignment. Additionally, the Applicant is proposing a change in structure type for structures 169 and 171 from 2 pole H-frame guyed structures to three pole dead-end structures to accommodate the new span distances between structures.

Structures 174-176: The Applicant is proposing a shift of structure locations 174-175 approximately 8 feet south of the originally approved centerline. These shifts are proposed in order to place the structures on more favorable terrain for access and constructability, as the originally approved structures were located on the sloped side of a hillside. At the request of a landowner, the Applicant is proposing to shift structure location 176 approximately 90 feet south along the approved centerline, further away from a private access drive and commercial parking lot.

Structures 178-183: The Applicant is proposing a shift of structure location 178 by approximately 18 feet to the south of the originally approved centerline to a hilltop position, while changing the structure type from a guyed H-frame to a three-pole dead-end structure for more stability along the sloped terrain. This shift required adjustments of roughly 10 feet on average to structure locations 179-183 in order to maintain a tangent alignment along this section of the project within the right-of-way.

Rerouting outside the existing right-of-way

There is one instance of rerouting the approved route outside of the existing right-of-way. Since approval of Case No. 18-0031-EL-BTX, the final design of the Heppner Switch Station defined the location of the entrance point of the substation bay. As such, structure location 187 would be shifted 78 feet southwest of the approved centerline. The station is surrounded by open field which would require no tree clearing.

Application Review

Social Impacts

Staff finds that the proposed adjustments are not expected to significantly alter existing land uses, including agricultural land, or to increase the estimated capital costs for the project. The adjustments are primarily proposed as a result of the Applicant's final engineering of the approved preferred route. With the proposed adjustments, the number of residential structures identified within 1,000 feet of the centerline would raise by one from 30 to 31 but would drop for residences located within 200 feet of the right-of-way from five to four. The nearest residence is located within 50 feet of the right-of-way, which remains the same as the original approved route. No

residential structures are located within the right-of-way nor would any residential structures need to be removed to accommodate this project. The amended alignments would not significantly alter the percentage of agricultural or residential land being crossed.

Staff finds that the purposes of the adjustments and reroute to avoid sloped features and to provide better accessibility with final design and engineering are reasonable.

Cultural Resources

These revised alignment sections have been studied for the presence of archaeological resources and impacts to historic structures. While no significant adverse impacts on historic structures are expected, archaeological sites are located adjacent to the original centerline, near the existing transmission line and proposed revised alignments for this project.

The Ohio Historic Preservation Office (OHPO) concurs that the amended alignments would not be expected to impact historic structures. However, resulting from studies performed in Case No. 18-0031-EL-BTX, the Applicant is continuing to finalize coordination with the OHPO regarding avoidance of archaeological sites associated with this project. If avoidance is not possible, the OHPO recommends that the Applicant conduct further archaeological investigations in order to confirm if these sites contain evidence of prehistoric habitation (latest letter from OHPO on this topic was dated January 17, 2020). Staff concurs with the recommendation that coordination with OHPO and Staff should be completed prior to construction of this project.

Surface Waters

The approved route right-of-way contains 16 stream crossings, including three perennial streams, nine intermittent streams, and four ephemeral streams, totaling 3,183 linear feet of stream crossings. The proposed adjustments would eliminate one ephemeral stream crossing and add four new ephemeral stream crossings. The proposed adjusted route right-of-way would contain 2,904 linear feet of stream crossings. All streams would be aerially spanned by the proposed transmission line.

The proposed adjusted route right-of-way would cross the same wetlands as the original route right-of-way. The acreage of wetlands would not change. No structures would be placed within wetlands. Adherence to the conditions of the original certificate including implementation of the storm water pollution prevention plan would minimize impacts to surface water resources that could occur as a result of the proposed adjustments.

Threatened and Endangered Species

The proposed adjustments would not result in increased impacts to listed wildlife species. Adherence to the conditions of the original certificate would minimize impacts to listed species.

Recommended Findings

Staff recommends approval of this amendment provided that the following conditions are satisfied. Staff notes that its recommendation for approval of this amendment should not be construed as a recommendation for approval of cost recovery in any ratemaking proceeding.

Conditions:

- (1) The Applicant shall continue to adhere to all conditions of the Opinion, Order, and Certificate for the Pine Ridge Switch-Heppner 138 kilovolt rebuild project in Case No. 18-0031-EL-BTX, following the route as amended through this application.
- (2) Prior to construction, the Applicant shall finalize coordination with the Ohio Historic Preservation Office and Staff in order to mitigate for potential adverse impacts to archaeological sites within and adjacent to the project.
- (3) The certificate authority provided in this case shall not exempt the facility from any other applicable and lawful local, state, or federal rules or regulations nor be used to affect the exercise of discretion of any other local, state, or federal permitting or licensing authority with regard to areas subject to their supervision or control.

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

4/20/2020 11:44:21 AM

in

Case No(s). 19-2124-EL-BTA

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