

# LETTER OF NOTIFICATION FOR GUERNSEY 765 kV TRANSMISSION LINE EXTENSION PROJECT



PUCO Case No. 20-0788-EL-BLN

Submitted to:  
The Ohio Power Siting Board  
Pursuant to Ohio Administrative Code  
Section 4906-6-05

Submitted by:  
AEP Ohio Transmission Company, Inc.

May 28, 2020

# LETTER OF NOTIFICATION FOR GUERNSEY 765 KV TRANSMISSION LINE EXTENSION PROJECT

## LETTER OF NOTIFICATION

AEP Ohio Transmission Company, Inc.  
Guernsey 765 kV Transmission Line Extension

### 4906-6-05

AEP Ohio Transmission Company, Inc. ("the Company") is providing the following information to the Ohio Power Siting Board ("OPSB") in accordance with the accelerated application requirements of Ohio Administrative Code Section 4906-6-05.

### 4906-6-05(B) General Information

#### B(1) Project Description

**The name of the project and applicant's reference number, names, and reference number(s) of resulting circuits, a brief description of the project, and why the project meets the requirements for a Letter of Notification.**

The Company is required to cut into the existing Kammer-Dumont 765 kV transmission line and construct two 765 kilovolt (kV) transmission line extensions in Valley Township, Guernsey County, Ohio to satisfy the Federal Energy Regulatory Commission's ("FERC") order in Docket No. ER19-603-002 and serve a new Independent Power Producer ("Customer") in the area. The cut-in requires replacing two structures along the existing Kammer-Dumont 765 kV transmission line in order to accommodate the two new line extensions. The extensions will cut in and loop the Company's existing Kammer-Dumont 765 kV transmission line to the Guernsey 765 kV Station, which the OPSB approved in Case No. 17-1828-EL-BLN and which the Company understands is currently under construction.

A Letter of Notification ("LON") for the subject line extensions was originally submitted on November 21, 2017 in Case No. 17-2363-EL-BLN. Due to subsequent design changes by the Customer and to reflect proper ownership of the line assets required to serve the Customer, the extensions now require two separate OPSB applications. This LON proposes to build one new structure for each line extension between the Kammer-Dumont 765 kV Transmission Line and the Guernsey Station (two structures total), as well as the line extensions themselves (the "Project" or "Project Area"). These assets are considered assets of the Company. Additionally, the cut-in will require replacing two structures on the existing Kammer-Dumont 765 kV Transmission Line. The two replacement structures will be assets of Ohio Power Company ("AEP Ohio") and will be filed separately with the OPSB in Case No. 20-787-EL-BLN (Kammer-Dumont 765 kV Transmission Line Cut-In).

The Project meets the requirements for a LON because it is within the types of projects defined by Item (1)(d)(ii) of *Appendix A* to O.A.C. 4906-1-01, *Application Requirement Matrix For Electric Power Transmission Lines*:

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*(1) New construction, extension or relocation of single or multiple circuit electric power transmission line(s), or upgrading existing transmission or distribution line(s) for operation at a higher transmission voltage, as follows:*

*(d) Line(s) primarily needed to attract or meet the requirements of specific customer or customers, as follows:*

*(ii) Any portion of the line is on property owned by someone other than the specific customer or applicant.*

### **B(2) Statement of Need**

**If the proposed project is an electric power transmission line or natural gas transmission line, a statement explaining the need for the proposed facility.**

The Project is necessary to modify the existing Kammer-Dumont 765 kV transmission line to serve the Customer's facility in Guernsey County, Ohio. The Company is required to complete the Project per the FERC's directives in its May 10, 2019 Order in *PJM Interconnection, L.L.C.*, Docket No. ER19-603-002 Compliance Filing of Original Service Agreement No. 5250; Queue No. AB2-067/AC1-044 (1100 MW, and 550 MW addition, respectively), and as subsequently superseded in the December 3, 2019 *PJM Interconnection, L.L.C.*, Docket No. ER20-509-000 Service Agreement Nos. 5245 and 5250; Queue No. AB2-067/AC1-044/AD2-189, (the addition of 225 MW in queue AD2-189). The documents filed as part of those proceedings are governed by Section 205 of the Federal Power Act; Part 35 of the FERC's rules and regulations; and the PJM Open Access Transmission Tariff, Part VI.

As part of above-referenced proceedings, FERC accepted the Guernsey Interconnection Service Agreement ("ISA"), which facilitates the interconnection of 1,875 MW (Maximum Facility Output) at the Guernsey Power Station Customer Facility located in Valley Township, Guernsey County, Ohio to the PJM transmission system. The Customer's 765 kV interconnection station will be called Guernsey Station (and filed by the Customer in OPSB Case No. 17-1828-EL-BLN). In order to connect to the Guernsey Station, AEP's Kammer-Dumont 765 kV transmission line must be cut and looped into the station to the east and west of the power plant site. The PJM Network Upgrade ID for the AEP 765 kV transmission line modification is n5355 (referenced in Section 3.0, b., item 4 of ER20-509-000 Guernsey ISA, Construction Responsibility and Ownership of Interconnection Facilities, Interconnected Transmission Owner). The project was listed in AEP Ohio Transco's 2019 Long-Term Forecast Report Table FE-T9, page 63 (Appendix B), but was inadvertently omitted from the 2020 LTFR.

### **B(3) Project Location**

**The applicant shall provide the location of the project in relation to existing or proposed lines and substations shown on an area system map of sufficient scale and size to show existing and proposed transmission facilities in the project area.**

The location of the Project in relation to existing transmission lines and stations is shown on Map 1 in Appendix A. The Project directly impacts the following existing facilities:

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- Kammer-Dumont 765 kV Transmission Line

### **B(4) Alternatives Considered**

**The applicant shall describe the alternatives considered and reasons why the proposed location or route is best suited for the proposed facility. The discussion shall include, but not be limited to, impacts associated with socioeconomic, ecological, construction, or engineering aspects of the project.**

The Project Area and surrounding land uses consist of agricultural, forest, rural residential, and commercial/industrial land. It is the Company's understanding the Customer designed the Guernsey Station to be positioned as close to the Kammer-Dumont 765 kV transmission line as possible. The proposed Project represents the most direct and appropriate solution for meeting the Customer's needs. Therefore, no significant alternatives were considered as part of this Project.

### **B(5) Public Information Program**

**The applicant shall describe its public information program to inform affected property owners and tenants of the nature of the project and the proposed timeframe for project construction and restoration activities.**

The Company will inform affected property owners and tenants about this Project through several different mediums. Within seven (7) days of filing this LON, the Company will issue a public notice in a newspaper of general circulation in the Project Area. The notice will comply with requirements of OAC Section 4906-6-08(A)(1-6). Further, the Company has mailed (or will mail) a letter, via first class mail, to affected landowners, tenants, contiguous owners and other landowners the Company may approach for an easement necessary for the construction, operation, or maintenance of the Project. The letter will comply with requirements of OAC Section 4906-6-08(B). The Company maintains a website (<https://www.aepohio.com/>) which provides the public access to an electronic copy of this LON and the public notice for this LON. An electronic copy of the LON will be served to the public library in each political subdivision for this Project. The Company retains ROW land agents that discuss Project timelines, construction and restoration activities and convey information to affected owners and tenants throughout the project.

### **B(6) Construction Schedule**

**The applicant shall provide an anticipated construction schedule and proposed in-service date of the project.**

The Company anticipates construction of the Project will begin in September 2020, and the in-service date of the Project will be approximately May 2021.

### **B(7) Area Map**

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**The applicant shall provide a map of at least 1:24,000 scale clearly depicting the facility with clearly marked streets, roads, and highways, and an aerial image.**

Map 1 included in Appendix A identifies the location of the Project Area on a United States Geological Survey 1:24,000 quadrangle map. Map 2 in Appendix A is an aerial map of the Project Area. To visit the Project from Columbus, take I-70 E towards Wheeling, West Virginia. Continue on I-70 for approximately 83 miles, then take exit 180A for I-77 S toward Marietta. After 6.1 miles take exit 37 for OH-313 W toward Senecaville/Pleasant City and turn right. After 0.1-mile turn right onto Nixon Street. Continue for approximately 0.5-mile and arrive at Project on the right. The coordinates of the entrance to the Guernsey Station is latitude 39.928784, longitude -81.539100.

### **B(8) Property Agreements**

**The applicant shall provide a list of properties for which the applicant has obtained easements, options, and/or land use agreements necessary to construct and operate the facility and a list of the additional properties for which such agreements have not been obtained.**

The proposed Project will be constructed largely on Customer property. Provided below is a table of property parcel numbers with an indication if the easement/agreement/option necessary to construct and operate the facility has been obtained.

<b>Property Parcel Number</b>	<b>Easement/ Option Obtained (Yes/No)</b>
380000293000	No
380000013000	No
380002713000	No
380000046003	No
380000046002	No
380000046004	No

### **B(9) Technical Features**

**The applicant shall describe the following information regarding the technical features of the Project:**

**B(9)(a) Operating characteristics, estimated number and types of structures required, and right-of-way and/or land requirements.**

The transmission line extension construction is estimated to include the following:

Voltage: 765kV  
Conductors: (3) 4-bundle 954 kcmil 45/7 ACSR – RAIL  
Static Wire: (2) 159 kcmil 12/7 ACSR – GUINEA

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Insulators: Ceramic deadends, polymer jumper loop supports  
ROW Width: 200 feet  
Structure Types: Two (2) single circuit, steel three-pole deadends

### **B(9)(b) Electric and Magnetic Fields**

**For electric power transmission lines that are within one hundred feet of an occupied residence or institution, the production of electric and magnetic fields during the operation of the proposed electric power transmission line. The discussion shall include:**

Not applicable. There are no occupied residences or institutions located within 100 feet of the proposed Project.

### **B(9)(c) Project Costs**

**The estimated capital cost of the project.**

The estimated capital cost of the Project, comprised of applicable tangible and capital costs, is approximately \$5,500,000 (Class 4 estimate). However, the Project is reimbursable through the PJM process and the developer is responsible for all costs associated with the interconnection.

### **B(10) Social and Economic Impacts**

**The applicant shall describe the social and ecological impacts of the project.**

**B(10)(a) Provide a brief, general description of land use within the vicinity of the proposed project, including a list of municipalities, townships, and counties affected.**

The Project is located within Valley Township, Guernsey County, Ohio. Land use in the immediate vicinity of the Project consists of a mix of commercial/industrial, rural residential, agricultural, utility infrastructure, forested areas, and floodplain associated with Wills Creek. Land use impacted by the Project is limited to agricultural land, utility infrastructure, forest, and floodplain along Wills Creek. The closest residence is located approximately 1,700 feet to the northeast of the easternmost proposed structure.

### **B(10)(b) Agricultural Land Information**

**Provide the acreage and a general description of all agricultural land, and separately all agricultural district land, existing at least sixty days prior to submission of the application within the potential disturbance area of the project.**

According to coordination with the Guernsey County Auditor's Office on April 3, 2020, there is no registered Agricultural District Land in Valley Township. However, a portion of the Project Area is within an active agricultural hay field (see Map 2 in Appendix A).

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### **B(10)(c) Archaeological and Cultural Resources**

**Provide a description of the applicant's investigation concerning the presence or absence of significant archeological or cultural resources that may be located within the potential disturbance area of the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.**

A cultural resource survey was conducted by the Customer's consultant for the property, including the Guernsey Station, the Guernsey Power Station, and the Project. Results of the cultural resource surveys were documented in a Phase I Archaeological Survey Report and a Historic Architectural Reconnaissance Survey Report and were submitted to the State Historic Preservation Office ("SHPO") on September 12, 2017. Correspondence from the SHPO dated October 11, 2017 is provided as Appendix C. Additional Phase I and Phase II coordination with SHPO is occurring and the results will be provided to OPSB once completed.

### **B(10)(d) Local, State, and Federal Agency Correspondence**

**Provide a list of the local, state, and federal governmental agencies known to have requirements that must be met in connection with the construction of the project, and a list of documents that have been or are being filed with those agencies in connection with siting and constructing the project.**

A project-specific Storm Water Pollution Prevention Plan will be prepared and a Notice of Intent will be filed with the Ohio Environmental Protection Agency ("OEPA") for authorization of construction storm water discharges under General Permit OHC000005. The Company will implement and maintain best management practices to minimize erosion and control sediment to protect surface water quality during storm events.

A wetland and stream identification field investigation was completed by the Customer's consultant in 2016 and 2017. Impacts to jurisdictional features required to construct the Guernsey Station, the Guernsey Power Station, and the Project were permitted in a U.S. Army Corps of Engineers ("USACE") Section 404 Individual Standard Permit (Permit # LRH-2017-00244-MUS-Willis Creek) issued on February 22, 2018. Additionally, an OEPA Section 401 Water Quality Certification (OEPA ID #175544) was issued on February 20, 2018. The Customer is responsible for all USACE and Section 401 permitting for the Project and it is the Company's understanding that the Customer has identified the need to update wetland impacts based on design changes associated with the Customer's station (see Appendix D).

The Project is located within a Federal Emergency Management Agency ("FEMA") 100-year floodplain Zone A area (FEMA, Flood Insurance Rate Map, Panels 291 Map Number 39059C0291D Effective August 16, 2011). However, as the Project is within Guernsey County, the Project is exempt from floodplain permitting.

### **B(10)(e) Threatened, Endangered, and Rare Species**

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**Provide a description of the applicant's investigation concerning the presence or absence of federal and state designated species (including endangered species, threatened species, rare species, species proposed for listing, species under review for listing, and species of special interest) that may be located within the potential disturbance area of the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.**

Coordination with the USFWS' Ohio Ecological Services Field Office dated August 17, 2016 (Appendix E), indicated that the Indiana bat (*Myotis sodalis*; federally endangered) and northern long-eared bat (*Myotis septentrionalis*; federally threatened) may occur in the Project Area. No adverse effects to these species are anticipated, provided that no caves or abandoned mines are impacted and that seasonal tree clearing restrictions (i.e., federally-listed bat mitigation) are adhered to. The Company intends to limit tree clearing to between October 1 and March 31, thus impacts to federally listed species are not anticipated.

A coordination letter was submitted to the Ohio Department of Natural Resources' ("ODNR") Division of Wildlife ("DOW") seeking technical assistance for potential impacts to threatened or endangered species in the vicinity of the Project Area. A response letter from the ODNR DOW dated August 2, 2016 (Appendix E) indicated that a review of the Natural Heritage Database revealed no records of rare or endangered species within a one-mile radius of the Project.

Additional correspondence from ODNR was received on September 16, 2016 regarding the Guernsey Power Station that included an inter-disciplinary review within the ODNR. The letter includes comments from the DOW for the Indiana bat, Northern harrier (*Circus cyaneus*), black bear (*Ursus americanus*), and aquatic mussel species. The ODNR stated that no impacts are anticipated to the black bear. The Project will not involve instream work, therefore, based on the ODNR's response no impacts to freshwater mussels are anticipated. The Company intends to implement off-season tree clearing to avoid impact to the Indiana bat. The Project is within the range of the Northern harrier, a ground-nesting bird typically found in large marshes and grasslands. The ODNR recommended that impacts to these habitats should be avoided during the species nesting period of May 15-August 1. The Company will consult with the ODNR to determine whether portions of the Project may be considered suitable nesting habitat and coordinate a habitat survey with ODNR, if necessary. Correspondence with ODNR will be provided to OPSB once completed.



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### **B(10)(f) Areas of Ecological Concern**

**Provide a description of the applicant's investigation concerning the presence or absence of areas of ecological concern (including national and state forests and parks, floodplains, wetlands, designated or proposed wilderness areas, national and state wild and scenic rivers, wildlife areas, wildlife refuges, wildlife management areas, and wildlife sanctuaries) that may be located within the potential disturbance area of the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.**

Coordination letters were submitted to the USFWS and ODNR requesting a review of the Project and identification of areas of ecological concern. The USFWS response received on August 17, 2016 (Appendix E), indicated that there were no federal wilderness areas, wildlife refuges or designated critical habitat within the vicinity of the Project. The ODNR DOW response dated August 2, 2016 (Appendix E), indicated no record in their database of unique ecological sites, geologic features, animal assemblages, scenic rivers, state wildlife areas, nature preserves, parks or forests, national wildlife refuges, or other protected natural areas within a one-mile radius of the Project.

No properties identified in the National Conservation Easement Database (<http://www.conservationeasement.us>) were identified in the Project Area.

The Project is located within a FEMA 100-year floodplain Zone AE area (FEMA, Flood Insurance Rate Map, Panel 291 Map Number 39059C0291D Effective August 16, 2011). However, as the Project is within Guernsey County, the Project is exempt from floodplain permitting.

A wetland and stream identification field investigation was completed by the Customer's consultant in 2016 and 2017. Impacts to jurisdictional features required to construct the Guernsey Station, the Guernsey Power Station, and the Project were permitted in a USACE Section 404 Individual Standard Permit (Permit # LRH-2017-00244-MUS-Willis Creek) issued on February 22, 2018, and the OEPA Water Quality Certification ("WQC") (OEPA ID #175544) issued on February 20, 2018.

### **B(10)(g) Unusual Conditions**

**Provide any known additional information that will describe any unusual conditions resulting in significant environmental, social, health, or safety impacts.**

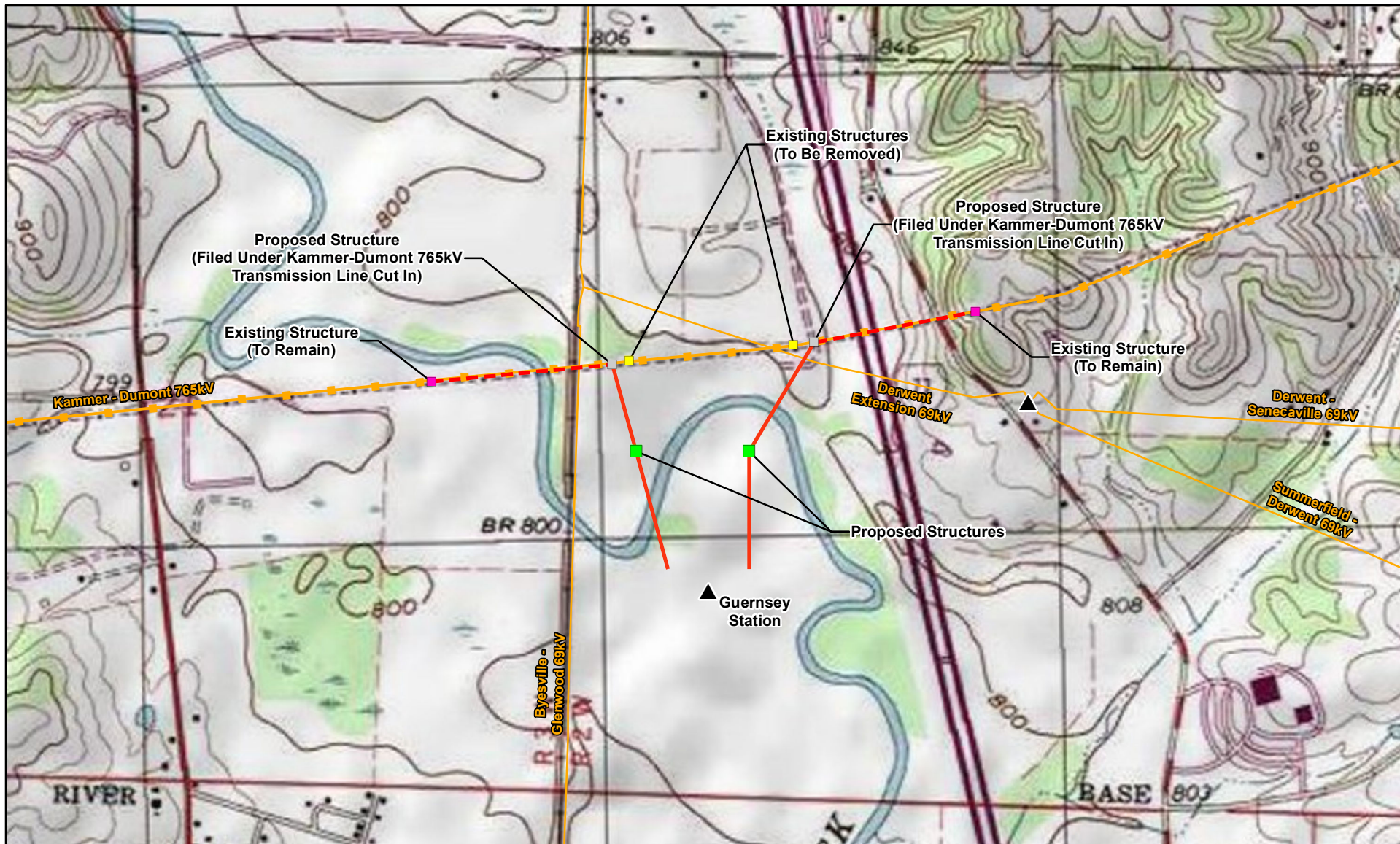
To the best of the Company's knowledge, unusual conditions existing with respect to the structures that are the subject of this Project that would result in substantial environmental, social, health, or safety impacts, are the responsibility of the Customer.

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## **Appendix A** Project Maps

Maps 1 and 2



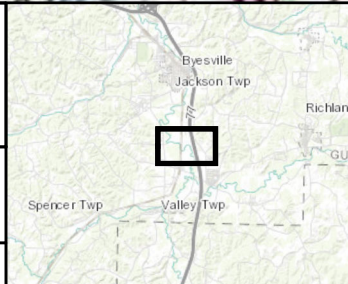
# Legend

- ▲ Station
- Existing Structure (To Remain)
- Existing Structure (To Be Removed)
- Proposed Structure
- Proposed Structure (Separate Filing)
- Proposed Transmission Centerline
- - Proposed Transmission Centerline (Separate Filing)
- Existing 69kV Transmission Line
- Existing 765kV Transmission Line

USGS Topographic, Esri ArcGIS Online, Accessed 04/2020.

NAD 1983 State Plane  
Ohio South Feet

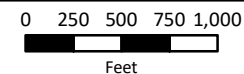
April 14, 2020



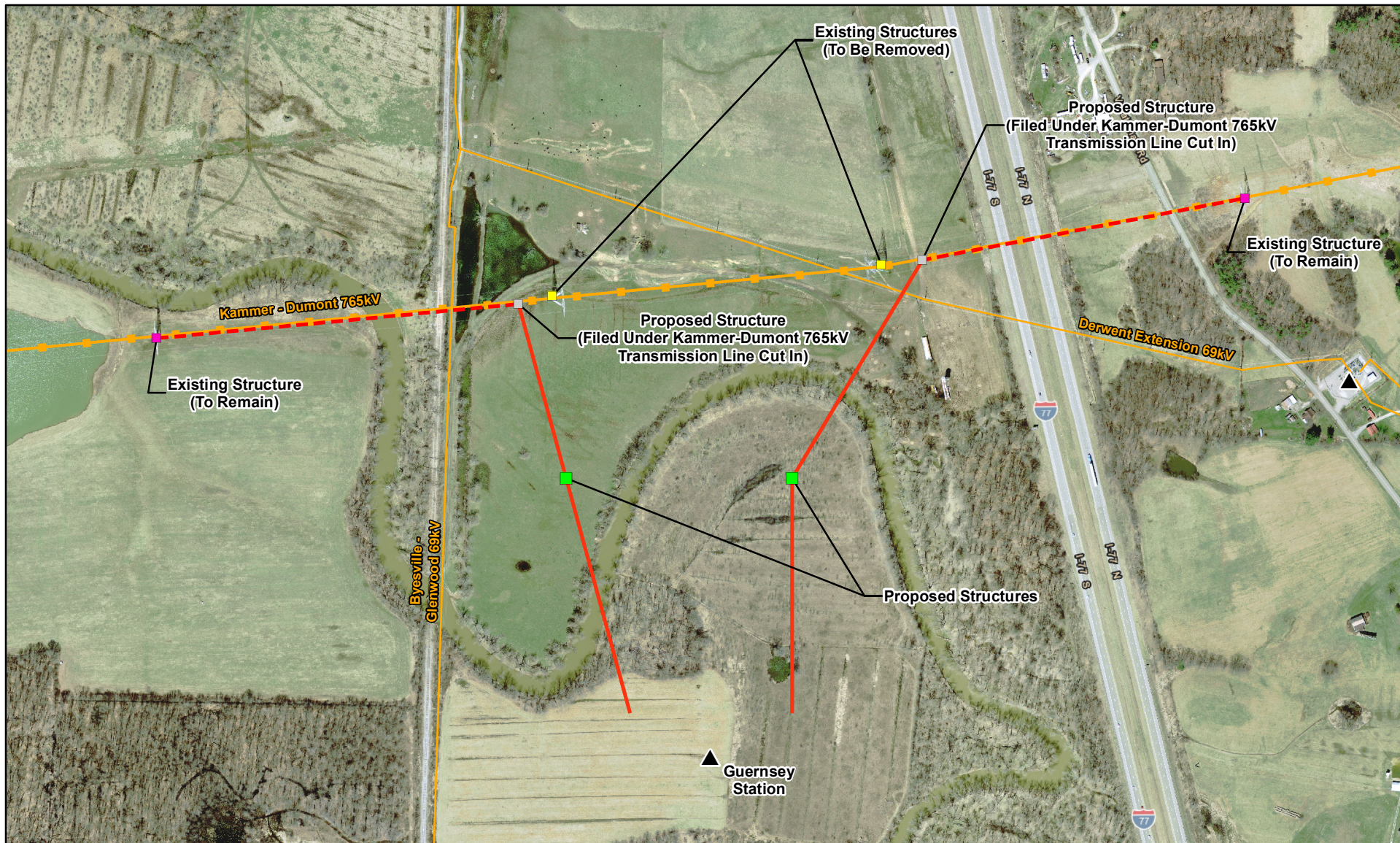
## Map 1 Project Location Map



Guernsey 765 kV  
Transmission Line Extension







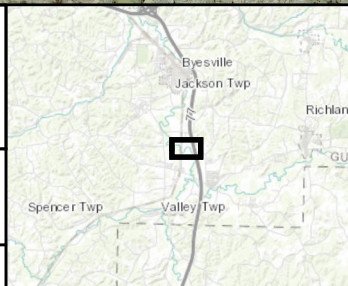
# Legend

- ▲ Station
- Existing Structure (To Remain)
- Existing Structure (To Be Removed)
- Proposed Structure
- Proposed Structure (Separate Filing)
- Proposed Transmission Centerline
- - Proposed Transmission Centerline (Separate Filing)
- Existing 69kV Transmission Line
- Existing 765kV Transmission Line

Aerial Imagery, Ohio Statewide Imagery Program (OSIP), 2014. Transportation, Esri ArcGIS Online, Accessed 04/2020.

NAD 1983 State Plane  
Ohio South Feet

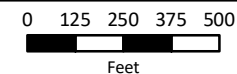
April 14, 2020



## Map 2 Aerial Map



Guernsey 765 kV  
Transmission Line Extension





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## **Appendix B** 2019 Long Term Forecast Report

PUCO FORM FE-T9  
AEP OHIO TRANSMISSION COMPANY  
SPECIFICATIONS OF PLANNED TRANSMISSION LINES

1.	LINE NAME AND NUMBER:	Kammer-Vassell 765kV circuit, Guernsey 765kV Extensions (to PJM IPP AB2-067, Guernsey Power Station) (N5355)
2.	POINTS OF ORIGIN AND TERMINATION	Guernsey 765kV station (IPP interconnection); INTERMEDIATE STATION - N/A
3.	RIGHTS-OF-WAY: LENGTH / WIDTH / CIRCUITS	0.1 mi / 150 ft / 2 circuit
4.	VOLTAGE: DESIGN / OPERATE	765kV / 765kV
5.	APPLICATION FOR CERTIFICATE:	LON approved in 2017
6.	CONSTRUCTION:	TBD (Guernsey IPP still pending at PJM)
7.	CAPITAL INVESTMENT:	\$1M
8.	PLANNED SUBSTATION:	NAME - Guernsey; TRANSMISSION VOLTAGE - 765kV; ACREAGE - 6; LOCATION - Bylesville
9.	SUPPORTING STRUCTURES:	Guyed V or Steel H-frame
10.	PARTICIPATION WITH OTHER UTILITIES	N/A
11.	PURPOSE OF THE PLANNED TRANSMISSION LINE	Extend existing 765kV line to new 765kV station (Guernsey), which will interconnect the proposed Guernsey Power Station
12.	CONSEQUENCES OF LINE CONSTRUCTION DEFERMENT OR TERMINATION	Not being able to power new 765kV natural gas power plant
13.	MISCELLANEOUS:	N/A

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**Appendix C** State Historic Preservation Office Correspondence



In reply refer to  
2017-GUE-39005-1-6

October 11, 2017

James T. Marine  
Tetra Tech, Inc  
661 Anderson Drive  
Pittsburgh, PA 15220

Dear Mr. Marine:

RE: Guernsey Power Station, Valley Township, Guernsey County, Ohio

This is in response to the receipt, on September 12, 2017 a revised version of *A Phase I Archaeological Survey, Guernsey Power Station, Valley Township, Guernsey County, Ohio*. Submitted at the same time were revised versions of *Historic Architecture Reconnaissance Survey, Guernsey Power Station, Valley Township, Guernsey County, Ohio* and *Phase I Archaeological Survey, Guernsey Power Station, Interconnection Property, Valley Township, Guernsey County, Ohio*. Also submitted for comment was *Guernsey Power Station, Site 33 GU 274 Phase II Site Evaluation, Valley Township, Guernsey County, Ohio*. The comments of the State Historic Preservation Office are submitted in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended.

Subsurface testing, surface collection and intensive visual inspection of the project area resulted in the identification of 19 previously unrecorded archaeological sites and the re-identification of site 33 GU 274. The newly identified sites, 33 GU 290—304 and 33 GU 316-319, are generally small lithic scatters typical of short term occupations and isolated historic artifacts. Based on the information provided, this office concurs with the opinion that sites 33 GU 274 and 33 GU 292-294 are potentially eligible for inclusion in the National Register of Historic Places. Additional Phase II testing at 33 GU 274 has demonstrated that the site is not eligible for inclusion in the National Register of Historic Places. According to the information submitted, sites 33 GU 292-294 are to be avoided.

The historic architecture reconnaissance survey included a background literature review and a systematic survey of historic architectural resources fifty years or older located within the project area (direct APE) or within one mile of the project area (indirect APE). In total, seventy historic architectural resources were identified, sixty-seven of which were located in the indirect APE, and three in the direct APE. Six farmsteads and one bridge were advanced to detailed study to determine NRHP-eligibility and assess potential effects (GUE0064319, GUE0064419, GUE0048915, GUE0064519, GUE0064619, GUE0064715, and GUE0064815). Tetra Tech recommends all seven of these properties as potentially eligible for inclusion in the National Register of Historic Places. Our office agrees with these recommendations of eligibility.



October 11, 2017  
James T. Marine  
Page 2

Tetra Tech has provided information to support their contention that the proposed project will not diminish the integrity or alter the characteristics that qualify any of the above referenced historic architecture resources for National Register inclusion. Therefore the project will have no adverse effect on historic properties.

No further coordination is required unless the project changes or additional archaeological remains are discovered during the course of the project. In such a situation, this office should be contacted as per 36 CFR 800.13.

Sincerely,



Joy Williams, Project Reviews Manager  
Resource Protection and Review

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**Appendix D** Guernsey Power Station Wetland Impact Letter

# GUERNSEY POWER STATION LLC

c/o Caithness Services LLC  
565 Fifth Avenue, 29<sup>th</sup> floor  
New York, New York 10017  
Phone: 212-921-9099  
Fax: 212-921-9239

May 26, 2020

Via E-Mail

Letter No. 20200526AEP003

American Electric Power (“AEP”)

Attn: Amanda Cahill

8600 Smiths Mill Road

New Albany, OH 43054

Email: [akcahill@aep.com](mailto:akcahill@aep.com)

RE: Final Design of 765kV Interconnection Layout

REF: Guernsey Power Station, USACE Permit No. LRH-2017-00244-MUS-Wills  
Creek, Ohio EPA Permit No. DSW 401175544

Dear Ms. Cahill:

We have appreciated working closely with AEP towards final design and layout of the existing 765kV transmission line interconnect re-route, new 765kV generating station tie line route and new 765kV utility switchyard pad associated with Guernsey Power Station (“GPS”). The attached Figure 1, Electrical Interconnection Layout Comparison, shows the changes between original layout and the current layout. A summary of the changes include:

Route Description	Color	Original Configuration	Current Configuration
West 765kV Line Tap	Salmon	Two (2) structures	Two (2) structures
East 765kV Line Tap	Emerald	Two (2) structures	Two (2) structures
765kV Gen-Tie	Blue	Two (2) structures	One (1) structure
Gen. Plant Dist. Line	Yellow		Relocated in its entirety; previous wetland impacts eliminated, no new wetland impacts for relocation
Local Area Dist. Line	Yellow		Relocated in its entirety; previous wetland impacts eliminated, no new wetland impacts for relocation

This letter confirms that permanent, conversion and temporary wetland impacts associated with the existing 765kV transmission line interconnect re-route, new 765kV generating station tie line route and new 765kV utility switchyard pad are incorporated into the

“single and complete” activities addressed in the above-referenced permits. Although minor changes have resulted from the final design and layout considerations, the impacts remain at the level currently authorized and are not in wetlands of any higher quality. The following table provides a summary of the authorized impacts and currently anticipated impacts associated with GPS and AEP activities for the existing 765kV transmission line interconnect re-route, new 765kV generating station tie line route and new 765kV utility switchyard pad.

	Authorized Impacts (acres)				Revised Impacts (acres)			
	PEM	PSS	PFO	Total	PEM	PSS	PFO	Total
Permanent Impacts								
GPS	0.294	--	2.77	3.068	0.280	--	2.77	3.05
AEP	0.006	--	--	0.006	0.006	--	0.006	0.012
<i>Subtotal</i>	<i>0.300</i>	<i>--</i>	<i>2.77</i>	<i>3.07</i>	<i>0.286</i>	<i>--</i>	<i>2.776</i>	<i>3.06</i>
Conversion Impacts								
GPS	--	--	0.200	0.200	--	--	0.343	0.343
AEP	--	--	1.645	1.645	--	--	1.499	1.499
<i>Subtotal</i>	<i>--</i>	<i>--</i>	<i>1.845</i>	<i>1.845</i>	<i>--</i>	<i>--</i>	<i>1.842</i>	<i>1.842</i>
Temporary Impacts								
GPS	0.95	0.44	0.81	2.20	0.11	0.52	0.28	0.900
AEP	0.68	0.26	0.32	1.26	1.21	0.01	0.73	1.95
<i>Subtotal</i>	<i>1.63</i>	<i>0.70</i>	<i>1.13</i>	<i>3.46</i>	<i>1.32</i>	<i>0.53</i>	<i>1.01</i>	<i>2.85</i>

The minor wetland changes noted herein, as well as some other filled area changes recently identified, were discussed by GPS with the United States Army Corps of Engineers (“USACE”) and Ohio Environmental Protection Agency (“Ohio EPA”) on May 18, 2020. These discussions are ongoing and GPS will obtain formal approval from the USACE and Ohio EPA for all changes prior to implementation of the activities for the current layout. As of the date of this letter, AEP’s activities on site have been limited to surveying and AEP has not performed any construction activities. As noted hereinabove, the impacts will continue to be under the authority of the above-referenced permits.

Sincerely,

By: 

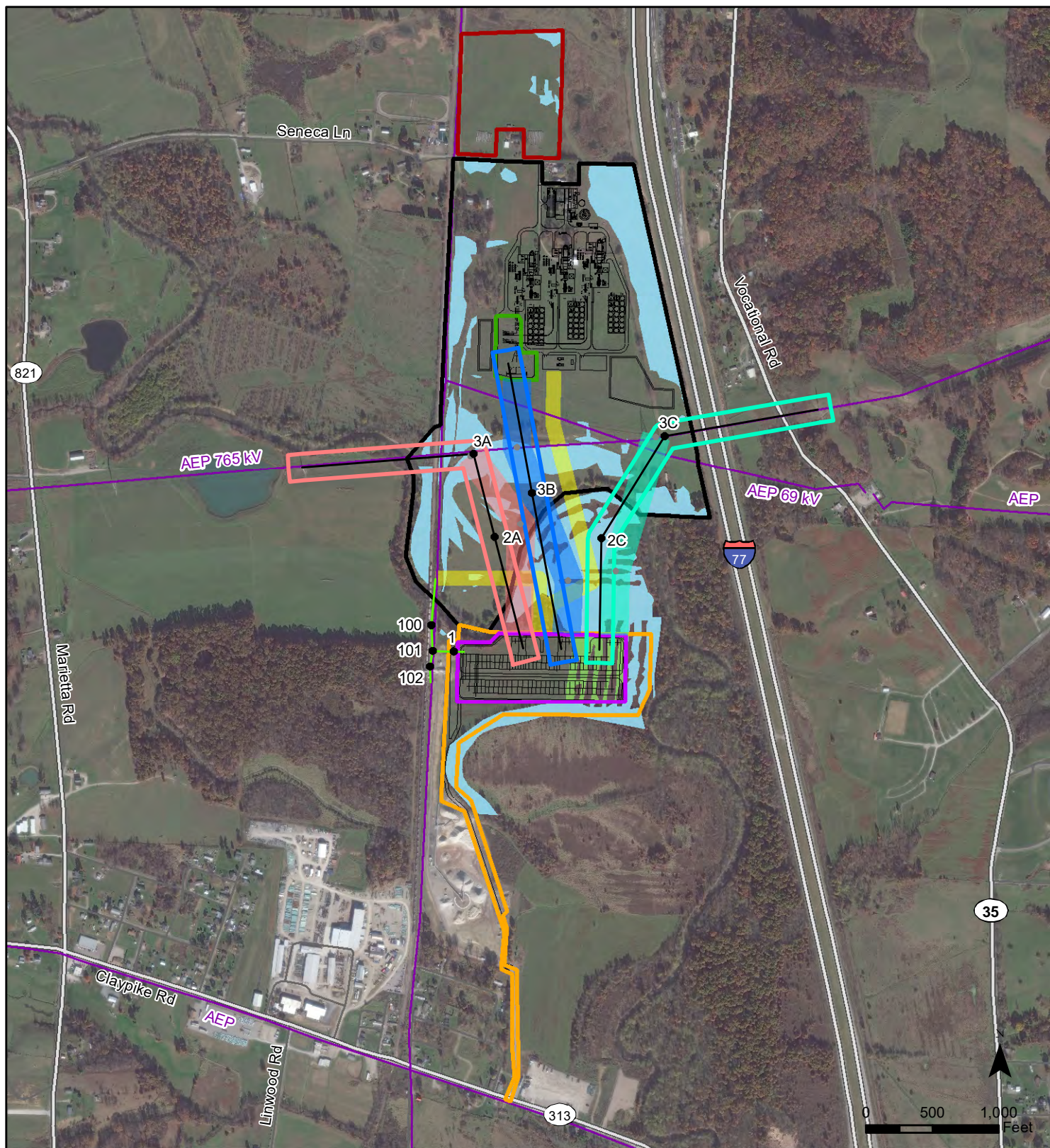
John Wanalista

Director, Engineering and Project Mgmt.

Enclosure

cc: Alicia Cross (AEP)  
Amy Toohey (AEP)  
Jeremy Walker (EPCS)  
Juan Alvarez (GPS)





#### Legend

- |                          |                            |   |
|--------------------------|----------------------------|---|
| Generating Facility Site | Interconnection ROW        | Existing Transmission/Subtransmission Lines |
| Proposed Laydown/Parking | Western Line Tap ROW       | Highways                                    |
| Interconnection Property | Eastern Line Tap ROW       | Local Roads                                 |
| GPS Collector Bus        | Proposed Transmission Line | Delineated Wetlands                         |
| Utility Switchyard       | Proposed 69kV Line         | Authorized Fill Completed                   |
|                          | Proposed Pole Location     |   |

Imagery Source: NAIP 2015

**Figure 1**  
**Electrical Interconnection**  
**Layout Comparison**

GPS Electrical Interconnection  
Guernsey County, Ohio



# LETTER OF NOTIFICATION FOR GUERNSEY 765 KV TRANSMISSION LINE EXTENSION PROJECT

May 28, 2020

## **Appendix E** USFWS and ODNR Correspondence





UNITED STATES DEPARTMENT OF THE INTERIOR  
U.S. Fish and Wildlife Service  
Ecological Services Office  
4625 Morse Road, Suite 104  
Columbus, Ohio 43230  
(614) 416-8993 / Fax (614) 416-8994



TAILS# 03E15000-2016-TA-1509

Dear Ms. Gresock,

We have received your recent correspondence requesting information about the subject proposal. There are no federal wilderness areas, wildlife refuges or designated critical habitat within the vicinity of the project area. The following comments and recommendations will assist you in fulfilling the requirements for consultation under section 7 of the Endangered Species Act of 1973, as amended (ESA).

The U.S. Fish and Wildlife Service (Service) recommends that proposed developments avoid and minimize water quality impacts and impacts to high quality fish and wildlife habitat (e.g., forests, streams, wetlands). Additionally, natural buffers around streams and wetlands should be preserved to enhance beneficial functions. If streams or wetlands will be impacted, the Corps of Engineers should be contacted to determine whether a Clean Water Act section 404 permit is required. Best management practices should be used to minimize erosion, especially on slopes. All disturbed areas should be mulched and revegetated with native plant species. Prevention of non-native, invasive plant establishment is critical in maintaining high quality habitats.

**FEDERALLY LISTED SPECIES COMMENTS:** All projects in the State of Ohio lie within the range of the federally endangered **Indiana bat** (*Myotis sodalis*) and the federally threatened **northern long-eared bat** (*Myotis septentrionalis*). In Ohio, presence of the Indiana bat and northern long-eared bat is assumed wherever suitable habitat occurs unless a presence/absence survey has been performed to document absence. Suitable summer habitat for Indiana bats and northern long-eared bats consists of a wide variety of forested/wooded habitats where they roost, forage, and travel and may also include some adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, old fields and pastures. This includes forests and woodlots containing potential roosts (i.e., live trees and/or snags  $\geq 3$  inches diameter at breast height (dbh) that have any exfoliating bark, cracks, crevices, hollows and/or cavities), as well as linear features such as fencerows, riparian forests, and other wooded corridors. These wooded areas may be dense or loose aggregates of trees with variable amounts of canopy closure. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet (305 meters) of other forested/wooded habitat. Northern long-eared bats have also been observed roosting in human-made structures, such as buildings, barns, bridges, and bat houses; therefore, these structures should also be considered potential summer habitat. In the winter, Indiana bats and northern long-eared bats hibernate in caves and abandoned mines.

Should the proposed site contain trees 23 inches dbh, we recommend that trees be saved wherever possible. If any caves or abandoned mines may be disturbed, further coordination with this office is requested to determine if fall or spring portal surveys are warranted. If no caves or abandoned mines are present and trees 23 inches dbh cannot be avoided, we recommend that removal of any trees 23 inches dbh only occur between October 1 and March 31. Seasonal clearing is being recommended to avoid adverse effects to Indiana bats and northern long-eared bats. While incidental take of northern long-eared bats from most tree clearing is exempted by a 4(d) rule (see <http://www.fws.gov/midwest/endangered/mammals/nleb/index.html>), incidental take of Indiana bats is still prohibited without a project-specific exemption. Thus, seasonal clearing is recommended where Indiana bats are assumed present.

If implementation of this seasonal tree cutting recommendation is not possible, summer surveys may be conducted to document the presence or probable absence of Indiana bats within the project area during the summer. If a summer survey documents probable absence of Indiana bats, the 4(d) rule for the northern long-eared bat could be applied. Surveys must be conducted by an approved surveyor and be designed and conducted in coordination with the Endangered Species Coordinator for this office. Surveyors must have a valid federal permit. Please note that summer surveys may only be conducted between June 1 and August 15.

If there is a federal nexus for the project (e.g., federal funding provided, federal permits required to construct), no tree clearing should occur on any portion of the project area until consultation under section 7 of the ESA, between the Service and the federal action agency, is completed. We recommend that the federal action agency submit a determination of effects to this office, relative to the Indiana bat and northern long-eared bat, for our review and concurrence.

Due to the project type, size, and location, we do not anticipate adverse effects to any other federally endangered, threatened, proposed, or candidate species. Should the project design change, or during the term of this action, additional information on listed or proposed species or their critical habitat become available, or if new information reveals effects of the action that were not previously considered, consultation with the Service should be initiated to assess any potential impacts.

These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the ESA, and are consistent with the intent of the National Environmental Policy Act of 1969 and the Service's Mitigation Policy. This letter provides technical assistance only and does not serve as a completed section 7 consultation document. We recommend that the project be coordinated with the Ohio Department of Natural Resources due to the potential for the project to affect state listed species and/or state lands. Contact John Kessler, Environmental Services Administrator, at (614) 2656621 or at [john.kessler@dnr.state.oh.us](mailto:john.kessler@dnr.state.oh.us).



If you have questions, or if we can be of further assistance in this matter, please contact our office at (614) 4168993 [or ohio@fws.gov](mailto:or.ohio@fws.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Dan Everson". The signature is fluid and cursive, with the first name "Dan" being more prominent.

Dan Everson

Field Office Supervisor

cc: Nathan Reardon, ODNR-DOW

Jennifer Norris, ODNR-DOW



# Ohio Department of Natural Resources

JOHN R. KASICH, GOVERNOR

JAMES ZEHRINGER, DIRECTOR

## Ohio Division of Wildlife

*Raymond W. Petering, Chief*  
2045 Morse Rd., Bldg. G  
Columbus, OH 43229-6693  
Phone: (614) 265-6300

August 2, 2016

Lynn Gresock  
Tetra Tech, Inc.  
2 Lan Drive  
Westford, MA 01886

Dear Ms. Gresock,

After reviewing the Natural Heritage Database, I find the Division of Wildlife has no records of rare or endangered species in the Guernsey Power Station project area, including a one mile radius, in Jackson and Valley Townships, Guernsey County, Ohio. We are unaware of any unique ecological sites, geologic features, animal assemblages, scenic rivers, state wildlife areas, nature preserves, parks or forests, national wildlife refuges, parks or forests or other protected natural areas within a one mile radius of the project area.

Our inventory program has not completely surveyed Ohio and relies on information supplied by many individuals and organizations. Therefore, a lack of records for any particular area is not a statement that rare species or unique features are absent from that area. This letter only represents a review of rare species and natural features data within the Ohio Natural Heritage Database. It does not fulfill coordination under the National Environmental Policy Act (NEPA) or the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S. C. 661 et seq.) and does not supersede or replace the regulatory authority of any local, state or federal agency nor relieve the applicant of the obligation to comply with any local, state or federal laws or regulations.

Please contact me at 614-265-6818 if I can be of further assistance.

Sincerely,

A handwritten signature in blue ink that reads "Debbie Woischke".

Debbie Woischke  
Ohio Natural Heritage Database Program



# Ohio Department of Natural Resources

JOHN R. KASICH, GOVERNOR

JAMES ZEHRINGER, DIRECTOR

**Office of Real Estate**  
*Paul R. Baldridge, Chief*  
2045 Morse Road – Bldg. E-2  
Columbus, OH 43229  
Phone: (614) 265-6649  
Fax: (614) 267-4764

September 16, 2016

Lynn Gresock  
Tetra Tech Inc.  
661 Anderson Drive  
Pittsburgh, PA 15220

**Re:** 16-558; Threatened and Endangered Species Review Information Request, Guernsey Power Station

**Project:** The proposed project involves the development of a natural gas fired combined cycle electric generating facility.

**Location:** The proposed project is located in Valley Township, Guernsey County, Ohio.

The Ohio Department of Natural Resources (ODNR) has completed a review of the above referenced project. These comments were generated by an inter-disciplinary review within the Department. These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the National Environmental Policy Act, the Coastal Zone Management Act, Ohio Revised Code and other applicable laws and regulations. These comments are also based on ODNR's experience as the state natural resource management agency and do not supersede or replace the regulatory authority of any local, state or federal agency nor relieve the applicant of the obligation to comply with any local, state or federal laws or regulations.

**Natural Heritage Database:** A review of the Natural Heritage Database has no records at or within a one mile radius of the project area.

The Natural Heritage Database has no records within a one mile radius of the project. We are unaware of any unique ecological sites, geologic features, animal assemblages, scenic rivers, state wildlife areas, state nature preserves, state parks or national parks, state or national forests or national wildlife refuges within the project area. The review was performed on the project area you specified in your request as well as an additional one mile radius. Records searched date from 1980 to present.

Please note that Ohio has not been completely surveyed and we rely on receiving information from many sources. Therefore, a lack of records for any particular area is not a statement that rare species or unique features are absent from that area. Although all types of plant communities have been surveyed, we only maintain records on the highest quality areas.

**Fish and Wildlife:** The Division of Wildlife (DOW) has the following comments.

The DOW recommends that impacts to wetlands and other water resources be avoided and minimized to the fullest extent possible, and that best management practices be utilized to minimize erosion and sedimentation.

The project is within the range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species. The following species of trees have relatively high value as potential Indiana bat roost trees to include: shagbark hickory (*Carya ovata*), shellbark hickory (*Carya laciniosa*), bitternut hickory (*Carya cordiformis*), black ash (*Fraxinus nigra*), green ash (*Fraxinus pennsylvanica*), white ash (*Fraxinus americana*), shingle oak (*Quercus imbricaria*), northern red oak (*Quercus rubra*), slippery elm (*Ulmus rubra*), American elm (*Ulmus americana*), eastern cottonwood (*Populus deltoides*), silver maple (*Acer saccharinum*), sassafras (*Sassafras albidum*), post oak (*Quercus stellata*), and white oak (*Quercus alba*). Indiana bat roost trees consists of trees that include dead and dying trees with exfoliating bark, crevices, or cavities in upland areas or riparian corridors and living trees with exfoliating bark, cavities, or hollow areas formed from broken branches or tops. However, Indiana bats are also dependent on the forest structure surrounding roost trees. If suitable habitat occurs within the project area, the DOW recommends trees be conserved. If suitable habitat occurs within the project area and trees must be cut, the DOW recommends cutting occur between October 1 and March 31. If suitable trees must be cut during the summer months, the DOW recommends a net survey be conducted between June 1 and August 15, prior to any cutting. Net surveys should incorporate either nine net nights per square 0.5 kilometer of project area, or four net nights per kilometer for linear projects. If no tree removal is proposed, this project is not likely to impact this species.

This project must not have an impact on freshwater native mussels at the project site. This applies to both listed and non-listed species. Per the Ohio Mussel Survey Protocol (2016), all Group 2, 3, and 4 streams (Appendix A) require a mussel survey. Per the Ohio Mussel Survey Protocol, Group 1 streams (Appendix A) and unlisted streams with a watershed of 10 square miles or larger above the point of impact should be assessed using the Reconnaissance Survey for Unionid Mussels (Appendix B) to determine if mussels are present. Mussel surveys may be recommended for these streams as well. This is further explained within the Ohio Mussel Survey Protocol. Therefore, if in-water work is planned in any stream that meets any of the above criteria, the DOW recommends the applicant provide information to indicate no mussel impacts will occur. If this is not possible, the DOW recommends a professional malacologist conduct a mussel survey in the project area. If mussels that cannot be avoided are found in the project area, as a last resort, the DOW recommends a professional malacologist collect and relocate the mussels to suitable and similar habitat upstream of the project site. Mussel surveys and any subsequent mussel relocation should be done in accordance with the Ohio Mussel Survey Protocol. The Ohio Mussel Survey Protocol (2016) can be found at:

<http://wildlife.ohiodnr.gov/portals/wildlife/pdfs/licenses%20&%20permits/OH%20Mussel%20Survey%20Protocol.pdf>

The DOW recommends no in-water work in perennial streams from April 15 to June 30 to reduce impacts to indigenous aquatic species and their habitat. If no in-water work is proposed, this project is not likely to impact aquatic species.

The project is within the range of the northern harrier (*Circus cyaneus*), a state endangered bird. This is a common migrant and winter species. Nesters are much rarer, although they occasionally

breed in large marshes and grasslands. Harriers often nest in loose colonies. The female builds a nest out of sticks on the ground, often on top of a mound. Harriers hunt over grasslands. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 15 to August 1. If this habitat will not be impacted, the project is not likely to impact this species.

The project is within the range of the black bear (*Ursus americanus*), a state endangered species. Due to the mobility of this species, this project is not likely to impact this species.

Due to the potential of impacts to federally listed species, as well as to state listed species, we recommend that this project be coordinated with the US Fish & Wildlife Service.

**Water Resources:** The Division of Water Resources has the following comments.

Based upon the site map identifying the location of the proposed development, the project appears to be located within the Special Flood Hazard Area (SFHA) (i.e., one-percent-annual-chance or 100-year floodplain) of Wills Creek. A local floodplain development permit may be required for this project. For additional information regarding local floodplain management requirements, please contact Guernsey County's designated Floodplain Manager, Mr. Dave Saft at (740) 432-9359 or [dsaft@guernseycounty.org](mailto:dsaft@guernseycounty.org).

ODNR appreciates the opportunity to provide these comments. Please contact John Kessler at (614) 265-6621 if you have questions about these comments or need additional information.

John Kessler  
ODNR Office of Real Estate  
2045 Morse Road, Building E-2  
Columbus, Ohio 43229-6693  
[John.Kessler@dnr.state.oh.us](mailto:John.Kessler@dnr.state.oh.us)

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**5/28/2020 11:52:25 AM**

**in**

**Case No(s). 20-0788-EL-BLN**

Summary: Notice Letter of Notification Application for the Guernsey 765 kV Transmission Line Extension electronically filed by Tanner Wolfram on behalf of AEP Ohio Transmission Company, Inc.