

BEFORE THE POWER SITING BOARD OF THE STATE OF OHIO

In the Matter of the Application of AEP Ohio)
Transmission Company for the Second Amendment to)
the Ginger Switch-Vigo 138 kV Transmission Line) **Case No. 20-1278-EL-BTA**
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,



Theresa White
Executive Director
Ohio Power Siting Board

OPSB STAFF REPORT OF INVESTIGATION

Project Name: Second Amendment to the Ginger Switch-Vigo 138 kV Transmission Line Rebuild Project (associated prior case nos. 17-0638-EL-BTX, 19-1866-EL-BTA)

Case Number: 20-1278-EL-BTA

Project Location: Ross County

Applicant: AEP Ohio Transmission Company

Application Filing Date: August 14, 2020

Inspection Date: September 21, 2020

Report Date: October 30, 2020

Applicant's Waiver Requests: None

Staff Assigned: J. Pawley, G. Zeto

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 a second amendment to the Ginger Switch-Vigo 138 kilovolt (kV) transmission line rebuild project, which was approved by the Ohio Power Siting Board on November 15, 2018, in Case No. 17-0638-EL-BTX and subsequently amended in Case No. 19-1866-EL-BTA on April 16, 2020. Proposed adjustments are proffered following advanced detailed engineering and property owner discussions for the amended preferred 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 nos. 17-0638-EL-BTX and 19-1866-EL-BTA.¹ The proposed second amendment would not increase the number of structures

1. The cost for this project was described in Case No. 17-0638-EL-BTX and Applicant indicates that the entire project cost, will be included in the Applicant's formula rate (i.e. the annual transmission revenue applicable under PJM Open Access Transmission Tariff, Attached H-20) and would be assessed on all transmission customers with that zone. Case No. 17-0638-EL-BTX also indicated that this project was assigned PJM upgrade id s1432. (PJM Interconnection, "Transmission Construction Status," <https://pjm.com/planning/project-construction.aspx>. (Accessed October 6, 2020). A Supplemental Project is defined in the PJM Operating Agreement as a transmission expansion or enhancement that is not required for compliance with the following PJM criteria: system reliability, operational performance or economic criteria, pursuant to a determination by the Office of the Interconnection and is not a state public policy project pursuant to Operating Agreement, Schedule 6, section 1.5.9(a)(ii). See also, PJM Manual 14B: PJM Region Transmission Planning Process, Revision 46, effective August 28, 2019, available at: <https://www.pjm.com/-/media/documents/manuals/m14b.ashx>).

required for the Ginger Switch-Vigo rebuild project, but rather shift locations of the approved structures within the 100-foot right-of-way.

The Ginger Switch-Vigo project was originally approved as a rebuild of the existing Berlin-Ross 69 kV transmission line, mostly offset from the original centerline. That purpose has not changed with this second amendment request, in fact the rebuild is presently under construction, in areas not affected by this request. The structure shifts in this proposal remain within the right-of-way, and in the case of some shifts, revert back to the original centerline so additional impacts to the surrounding area would be minimal.

Construction commenced on the Ginger Switch-Vigo rebuild project on April 22, 2020 in areas not covered in this second amendment request. The Applicant's renewed timeframe has construction ending in the fourth quarter 2021.

Engineering Adjustments

There are three segments of proposed engineering adjustments to the approved route. The proposed engineering adjustments involve shifts in location of 22 structure locations. The structure location shifts range from a minimum of seven to a maximum of 53 feet away 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.

Structure 37: The Applicant is proposing a shift of structure location 37 approximately seven feet to the north of the originally approved structure location, and approximately 50 feet west along the centerline. This shift would allow the placement of the structure to a location that would avoid sloped terrain which would otherwise make the installation of the three-pole structure to have varying foundation depths of more than five feet per pole. The structure shift proposed is to locate the three-pole structure on level terrain.

Structures 42-55: The Applicant is proposing a shift of structure locations 42 through 55 so that the two-pole H-frame structures may be installed within the approved right-of-way while avoiding a buried fiber optic trunk line that was identified during engineering and right-of-way procurement. The structure shifts would range between 25 and 50 feet from the previously approved locations. The Applicant states that no new property owners are impacted by these shifts.

Structures 75-81: The Applicant is proposing a shift of structure locations 75 through 81 between 39 and 53 feet back to the original centerline of the to-be-replaced 69 kV line, as opposed to offset, at the result of landowner coordination during final engineering. The shifted structure locations would remain within the approved right-of-way for this project. One additional property is crossed however, the owner of this parcel is already crossed by the amended preferred route. As the location of the new transmission line would be shifted back to the original centerline, impacts to the surrounding area would be negligible.

Rerouting outside the approved 100-foot right-of-way

There are no instances of rerouting the amended preferred route outside of the 100-foot right-of-way.

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 remain at 115, with none of the residences located inside the right-of-way. Two residences are located within 50 feet of the right-of-way and six residences are located between 51 and 100 feet of the right-of-way. This changes from one residence within 50 feet and eight residences between 51 and 100 feet from the approved preferred route. No residential structures would need to be removed from the right-of-way.

These proposed alignment sections have been studied for the presence of archaeological resources and historic impacts and no significant adverse impacts on cultural resources are expected. The State Historic Preservation Office concurs that the amended alignments would not be expected to impact cultural resources. Staff agrees with this assessment.

Staff finds that the purposes of the proposed adjustments to avoid other buried utilities, provide for location of a structure on flatter terrain, and at the request of property owners is reasonable. As provided in the application, the amended alignments would not significantly alter the percentage of agricultural or residential land being crossed.

Surface Waters

The approved route right-of-way contains 20 stream crossings totaling 2,269 linear feet of streams. The proposed adjustments would include 22 stream crossings, including the elimination of one ephemeral stream crossing and the addition of two ephemeral and one intermittent stream crossing. The proposed adjusted route right-of-way contains 2,165 linear feet of streams.

The proposed adjusted route right-of-way would cross the same wetlands as the original route right-of-way. The acreage of wetlands would increase slightly from 0.52 acres to 0.55 acres. 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 Ginger Switch-Vigo 138 kilovolt rebuild project in case nos.

17-0638-EL-BTX and 19-1866-EL-BTA following the route as amended through this application.

- (2) 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.

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Case No(s). 20-1278-EL-BTA

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