

BEFORE THE POWER SITING BOARD OF THE STATE OF OHIO

**In the Matter of the Letter of Notification Application     )**  
**of AEP Ohio Power Company, Inc. for the                     )**  
**Sterling-Foundry Park 138 kV Transmission Line Raise    )**     **Case No. 21-0590-EL-BLN**  
**Project   )**

Members of the Board:

Chair, 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 (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 (Ohio Adm. Code) 4906-6.

Staff recommends the application for automatic approval September 8, 2021, unless suspended by the Board, an administrative law judge, or the chairperson or executive director of the Board for good cause shown. If suspended, the Board must render a decision on the application within 90 days from the date of suspension.

Please present any concerns you or your designee may have with this case to my office at least four business days prior to September 8, 2021, which is the recommended automatic approval date.

Please present any concerns you or your designee may have with this case to my office.

Sincerely,



Theresa White  
Executive Director  
Ohio Power Siting Board

## OPSB STAFF REPORT OF INVESTIGATION

**Case Number:** 21-0590-EL-BLN  
**Project Name:** Sterling-Foundry Park 138 kV Transmission Line Raise Project  
**Project Location:** Allen County  
**Applicant:** AEP Ohio Power Company, Inc.  
**Application Filing Date:** June 9, 2021  
**Filing Type:** Letter of Notification  
**Inspection Date:** August 30, 2021  
**Report Date:** September 1, 2021  
**Recommended Automatic Approval Date:** September 8, 2021  
**Applicant's Waiver Requests:** None  
**Staff Assigned:** T. Crawford, A. DeLong, M. Bellamy, G. Zeto

### Summary of Staff Recommendations (see discussion below):

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

### Project Description and Need

AEP Ohio Power Company, Inc (AEP Ohio Power or Applicant) proposes to elevate approximately 0.28 miles of the existing single circuit Sterling-Foundry Park 138 kilovolt (kV) transmission line. This would provide needed electrical clearance for the rebuilding of the 34.5 kV Lima Pumping Extension to 69 kV standards, while still operating the line at 34.5 kV. The existing wood monopoles of Structures 9-12 supporting the Sterling-Foundry Park 138 kV line would be replaced with steel monopoles to provide the elevation.

The Applicant states that the project is needed to provide electrical clearance between the Sterling-Foundry Park 138 kV transmission line and the 34.5 kV Lima Pumping Extension. This project is part of the larger overall project to rebuild approximately 0.4 miles of the existing 34.5 kV Lima Pumping Extension to 69 kV standards. The existing 34.5 kV line serves two retail customers which have experienced considerable outage time caused by obsolete cross-arm construction and inadequate phase spacing. The two retail customers are served by a hard tap into the Lima Pumping Extension line and the overall project would replace the taps with phase-over-phase manual switches at the Sterling-South Side Lima circuit and at the Lima Pumping Extension. Hard taps limit the ability of the transmission operator to isolate or sectionalize loads during planned or unplanned outages and the switches would improve operating flexibility and reliability.

Upgrades to the transmission system are part of PJM Interconnection, LLC's (PJM) Regional Transmission Expansion Planning (RTEP) process.<sup>1</sup> The need and solution for this project were presented and reviewed with stakeholders at the PJM Subregional RTEP Western meetings of February 21, 2020 and August 14, 2020, respectively. The project was assigned the supplemental project ID s2352.<sup>2</sup> Supplemental projects or upgrades refer to transmission expansions or enhancements not needed to comply with PJM reliability, operational performance, Federal Energy Regulatory Commission Form No. 715 criteria, economic planning, and public policy planning (State Agreement Approach).<sup>3</sup>

The Applicant indicates that it did not include this project in its Long-Term Forecast Report (LTFR) since raising the line does not result in an operation, modeling or topology change to the electrical grid and it does not create a new transmission networked facility.<sup>4</sup>

The Applicant expects construction of the project to begin September 2021 with an in-service date planned for December 2021. The capital cost of the rebuild project is estimated to be approximately \$380,495.<sup>5</sup>

## **Nature of Impacts**

### *Land Use*

The project would be located in the City of Lima and the village of Fort Shawnee, both are within Allen County. The land use in the project area is industrial, containing roadway infrastructure and existing transmission line right-of-way. The land use for the area surrounding the project area is residential, commercial, and industrial. The Applicant states that the nearest residence is approximately 60 feet to the east of the project. This project does not propose any new or expanded right-of-way. The Applicant cites no recreational resources or scenic byways within 1,000 feet of the project area.

### *Cultural Resources*

The Applicant's cultural resources consultant performed a literature review and Phase I cultural resource management investigation (archaeology and history/architecture) for the project. The consultant determined that the project would neither involve nor impact any significant cultural

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1. PJM is the regional transmission organization charged with planning for upgrades to the regional transmission system in Ohio. Significant alterations to the transmission system located in the PJM control area are required to submit planned projects for review of system impacts.

2. <https://www.pjm.com/-/media/committees-groups/committees/srrtep-w/aep-local-plan-submission-of-the-supplemental-projects-for-2020-rtep.ashx> (Accessed June 11, 2021)

3. PJM Manual 14B: PJM Region Transmission Planning Process, Revision 48, Effective Date: October 1, 2020.

4. Staff notes Ohio Revised Code (R.C.) 4935.04 requires an LTFR to include a: "description of proposed changes in the transmission system planned for the next five years." This project being a "change" to the transmission system, Staff recommends the Applicant include future changes to the transmission system, even those that do not create "a new transmission networked facility" within its LTFR.

5. The Applicant indicates that the cost of the project is a Class 4 estimate, and will be projected to be transmission plant, and pursuant to the PJM Open Access Transmission Tariff, the cost will be recovered in the Applicant's FERC formula rate (Attachment H-14) and would be allocated to customers in the AEP Zone.

resources or landmarks, and that no further cultural resource management work was 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, and that no additional cultural resources studies are needed for the project. Staff agrees that no further cultural resource management work is necessary.

### *Surface Waters*

One Category 1 wetland was delineated in the project area.<sup>6</sup> However, this wetland would be avoided during construction. No streams are present within the project area. No in-water work is planned, and no surface water impacts are proposed.

The Applicant would submit a Notice of Intent for coverage under the Ohio Environmental Protection Agency National Pollutant Discharge Elimination System General Permit. Staff does not anticipate issues with the Applicant's procurement of this permit. As part of this permit, erosion control measures including silt fencing and other best management practices would be used where appropriate to minimize runoff impacts to nearby streams. The project would not overlap with any 100-year floodplain areas.

### *Threatened and Endangered Species*

The project area is currently developed for industrial land uses. Impacts to state and federal listed species would not occur due to a lack of proposed impacts to suitable habitats.

## **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 approval of this application on September 8, 2021 subject to the following conditions. Staff notes that its recommendation for approval of this application should not be construed as a recommendation for approval of cost recovery in any ratemaking proceeding.

## **Conditions**

- (1) 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.
- (2) Prior to the commencement of construction activities in areas that require permits or authorizations by federal or state laws and regulations, the Applicant shall obtain and comply with such permits or authorizations. The Applicant shall provide copies of permits and authorizations, including all supporting documentation, on the case docket prior to commencement of construction.

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6. Wetlands falling within the purview of the Clean Water Act are regulated within Ohio by R.C. 6111, et. seq. and Ohio Adm.Code 3745-1-50, et seq. Ohio Adm.Code 3745-1-54 establishes wetland categories.

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

**Commission of Ohio Docketing Information System on**

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**Case No(s). 21-0590-EL-BLN**

Summary: Staff Report of Investigation electronically filed by BreAnna J. Freeman on behalf of Staff of OPSB