BEFORE THE POWER SITING BOARD OF THE STATE OF OHIO

In the Matter of the Application of Harrison Power, LLC for the Harrison Power Plant Amendment Project	**)** **)**	**Case No. 21-0793-EL-BGA**

Members of the Board:

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

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.

Sincerely,

Theresa White
Executive Director
Ohio Power Siting Board

OPSB STAFF REPORT OF INVESTIGATION

Project Name:	Harrison Power Plant Amendment
Case Number:	21-0793-EL-BGA (associated with prior Case No. 17-1189-EL-BGN)
Project Location:	Harrison County
Applicant:	Harrison Power, LLC
Application Filing Date:	July 16, 2021
Inspection Date:	January 14, 2021
Report Date:	September 10, 2021
Applicant's Waiver Requests:	None
Staff Assigned:	A. Holderbaum, A. Conway, T. Crawford

Summary of Staff Recommendations (see discussion below):

Application: ☐ Approval ☐ Disapproval ☒ Approval with Conditions

Waiver: ☐ Approval ☐ Disapproval ☒ Not Applicable

Application Description

Harrison Power, LLC (Applicant or Harrison Power) proposes to amend the previously issued certificate in Case No. 17-1189-EL-BGN which was approved by the Ohio Power Siting Board (OPSB) on June 21, 2018 to build a new natural gas combined-cycle turbine electric generation facility in Harrison County having a net output of 1050 megawatts (MW).

Within this amendment, the Applicant requests authorization for an additional 35 MW of output for the station that would increase the total output of the station from 1,050 MW to 1,085 MW. The proposed increase in power plant capacity is not due to additional equipment. The increased capacity would result from new operational conditions that are based on updated additional performance testing of the combustion turbine and the manufacturer's fleet experience with the Mitsubishi Hitachi Power System M501JAC combustion turbine model.

Application Review

Electric Grid Interconnection

Pursuant to R.C. 4906.10(A)(4), the Board must determine that the proposed electric facilities are consistent with regional plans for expansion of the electric power grid of the electric systems serving this state and interconnected utility systems, and that the facilities will serve the interests of electric system economy and reliability.

PJM Interconnection, LLC (PJM) is the regional transmission organization charged with planning for upgrades and administering the generation queue for the regional transmission system in Ohio.

Generators wanting to interconnect to the bulk electric transmission system located in the PJM control area are required to submit and interconnection application for review of system impacts. The interconnection process provides for the construction of expansions and upgrades of the PJM transmission system, as needed to maintain compliance with reliability criteria with the addition of generation in its footprint.

The Applicant submitted its generation interconnection request for the proposed additional output to PJM on October 24, 2017, and PJM assigned the application the queue position of AD2-005. The AD2-005 project is an uprate to the AC1-103 project and will interconnect with the AEP transmission system at the Nottingham 138 kV substation. The Feasibility Study, the System Impact Study, and the Facilities Study were released by PJM in November 2018, June 2019, and December 2020, respectively. The System Impact Study identified no problems for the AD2-005 project in the areas of Contingency Descriptions, Generator Deliverability, Multiple Facility Contingency, Contributions to Previously Identified Overloads, Steady-State Voltage Requirements, Short Circuit, and Stability and Reactive Power Requirement.[1] The Facilities Study for the PJM Generator Interconnection Request Queue #AC1-103/AD2-005 identified a number of upgrades, expansions, and connections to be made by AEP to accommodate the interconnection.[2]

This amendment's requests for approval of the additional net output of 35 MW could be available in the PJM capacity market. The capacity market ensures that there is an adequate availability of generation resources that can meet present and future demand. The additional capacity has been reviewed and accepted by PJM within queue positions AC1-103 and AD2-005.

Finally, the North American Electric Reliability Corporation (NERC) is responsible for the development and enforcement of the federal government's approved reliability standards, which are applicable to all owners, operators, and users of the bulk power system (BPS). As an owner, operator, and/or user of the BPS, the Applicant is subject to compliance with various NERC reliability standards. NERC reliability standards are included as part of the system evaluations conducted by PJM.

Social Impacts

Staff finds that the proposed amendment would not alter existing land uses, including agricultural land, residential land, cultural resources nor would it increase the estimated capital costs for the project. Adherence to the conditions of the original certificate, as modified by any subsequent amendments, would minimize social impacts.

Surface Waters

The proposed amendment would not result in increased impacts to surface waters. Adherence to the conditions of the original certificate, as modified by any subsequent amendments, would minimize impacts to surface waters.

1. System Impact Study Report for the PJM Generation Interconnection Request Queue Position AD2-005, https://www.pjm.com/pub/planning/project-queues/impact-studies/ad2005_imp.pdf (Accessed September 3, 2021).

2. Facilities Study Report for the PJM Generator Interconnection Request Queue #AC1-103/AD2-005, https://www.pjm.com/pub/planning/project-queues/facilities/ad2005_fac.pdf (Accessed September 3, 2021)

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, as modified by any subsequent amendments, would minimize impacts to listed species.

Air Pollution[3]

According to the Applicant, the air emission information profile for the proposed facility capacity increase is consistent with its current air pollution Permit-to-Install (PTI), Facility ID No. 0634005152. Further, the Applicant has indicated that information was filed with Ohio Environmental Protection Agency (Ohio EPA) to obtain the most recent 2019 PTI which specifically noted an updated output capacity value of 1,085 MW. Staff consulted with Ohio EPA Division of Air Pollution Control personnel who is aware of the proposed power plant capacity increase request and anticipated construction schedule. Ohio EPA concurred with the Applicant's assessment of its PTI. Ohio EPA and Staff understand and anticipate that future changes to the PTI may likely be needed as the final design and construction schedule progresses and that the PTI should be reflective of final changes prior to operations. Staff believes that the most current air permit would be reflected and provided in the preconstruction and other pertinent filings to be provided to Staff as construction progresses; this is currently captured with condition six of the Stipulation and Certificate granted in Case No. 17-1189-EL-BGN.

Recommended Findings

Staff's review of the amendment application included consideration of the requirements listed in Ohio Revised Code Section 4906.10. Based on Staff's review, the amendment application meets the necessary criteria for granting an amended certificate. Staff recommends that the Board approve the proposed amendment to the Certificate, provided that the following conditions are satisfied.

Conditions

(1) The Applicant shall continue to adhere to all conditions as certificated in Case No. 17-1189-EL-BGN.

(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.

3. The Revised Code provides for the Ohio EPA to administer and enforce the provisions of R.C. Ch. 3704 with regards to air pollution control. See e.g., RC 3704.03, 3704.161. The Ohio EPA Division of Air Pollution Control ensures compliance with the federal Clean Air Act and the Emergency Planning and Community Right-to-Know Act as part of its mission to attain and maintain air quality at a level that protects the environment and public health. (Ohio EPA, Division of Air Pollution Control, https://www.epa.ohio.gov/dapc/#188913097-featured-topics>). The Division of Air Pollution Control develops and enforces rules in the Ohio Administrative Code, which assist the state of Ohio to: attain and maintain the National Ambient Air Quality Standards (NAAQS) contained in the Clean Air Act; fulfill the requirements set forth by the Ohio General Assembly in R.C. 3704; and protect and maintain healthy air quality for the citizens of the state of Ohio. (See, Ohio EPA, Division of Air Pollution Control Rules and Laws, <https://www.epa.ohio.gov/dapc/DAPCrules>).

(3) The facility shall be operated in such a way as to assure that no more than 1085 megawatts would be injected into the Bulk Power System at any time.

(4) The Applicant shall not commence any construction of the facility until it has executed an Interconnection Service Agreement and Interconnection Construction Service Agreement with PJM Interconnection, which includes construction, operation, and maintenance of system upgrades necessary to integrate the proposed generating facility into the regional transmission system reliably and safely. The Applicant shall docket in the case record a letter stating that the Agreement has been signed or a copy of the executed Interconnection Service Agreement and Interconnection Construction Service Agreement.

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