

**BEFORE THE  
OHIO POWER SITING BOARD**

In the Matter of the Ohio Power Siting Board's :  
Report to the General Assembly Regarding the Power : Case No. 21-796-EL-UNC  
Transmission System. :

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**REPLY COMMENTS OF  
THE OHIO ENERGY GROUP**

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The Ohio Energy Group (“OEG”) submits the following Reply Comments in response to the recommendation of various parties regarding the Ohio Power Siting Board’s (“Board”) Report to the General Assembly Regarding the Power Transmission System issued September 24, 2021 (“Draft Report”).

As American Transmission Systems, Incorporated (“ATSI”) notes, the Draft Report suggests a reluctance by the Board to expand its jurisdiction to transmission projects 69 kilovolts and above.<sup>1</sup> OEG urges the Board to reconsider this position. While it is logical that expanding the Board’s jurisdiction will entail additional costs to retail customers (e.g. utility application fees, possible Board staffing additions, etc.), the Draft Report does not provide a comprehensive cost-benefit analysis of whether those additional costs would outweigh the benefits to customers of increased regulatory oversight with respect to supplemental transmission projects.<sup>2</sup> Indeed, multiple commenters note the current lack of broad regulatory review over supplemental transmission projects, including the fact that those projects are not subject to approval by the PJM Board.<sup>3</sup> And the Draft Report itself documents the dramatic spikes in transmission costs

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<sup>1</sup> ATSI Comments at 1.

<sup>2</sup> Comments of Ohio Manufacturers’ Association Energy Group (“OMAEG”) at 11.

<sup>3</sup> Comments of American Municipal Power, Inc. and Ohio Municipal Electric Association at 3-4; OMAEG Comments at 4-6.

to Ohio retail customers that may, at least in part, result from this lack of broad regulatory oversight.<sup>4</sup> Accordingly, before closing the door to an expansion of the Board's jurisdiction, the Commission should quantify the potential costs of that expansion so that those costs could be weighed against the potential benefits of increased regulatory oversight.

OEG continues to support broad and comprehensive Board review of proposed transmission projects located within the State. Consequently, unlike Ohio Power Company/AEP Ohio Transmission Company, OEG is supportive of the additional application review criteria recommended in the Draft Report.<sup>5</sup> However, in the interest of protecting consumers from unjust and unreasonable transmission costs, OEG would also recommend that the Board require that all transmission projects be subject to a competitive bidding requirement, unless there is a demonstrable and compelling economic development interest in waiving that requirement.

Respectfully submitted,

/s/ Michael L. Kurtz

Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

**BOEHM, KURTZ & LOWRY**

36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

Ph: 513.421.2255 Fax: 513.421.2764

E-Mail: [mkurtz@BKLawfirm.com](mailto:mkurtz@BKLawfirm.com)

[kboehm@BKLawfirm.com](mailto:kboehm@BKLawfirm.com)

[jkylercohn@BKLawfirm.com](mailto:jkylercohn@BKLawfirm.com)

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**COUNSEL FOR THE OHIO ENERGY  
GROUP**

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<sup>4</sup> Draft Report at 5 and Appendix B.

<sup>5</sup> Draft Report at 13-16; AEP Comments at 3-4.

## CERTIFICATE OF SERVICE

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to this case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served (via electronic mail) on the 15<sup>th</sup> day of October 2021 to the following:

/s/ Michael L. Kurtz

Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

\*KRAUSEN, SUZETTE N. MS.  
MONITORING ANALYTICS, LLC  
2621 VAN BUREN AVENUE SUITE 160  
EAGLEVILLE PA19403

\*MCKENNEY, BRYCE A  
MCNEES WALLACE & NURICK  
21 EAST STATE STREET, 17TH FLOOR  
COLUMBUS OH43215

\*KALEPS-CLARK, LIJA MS.  
BUCKEYE POWER, INC./OHIO RURAL ELECTRIC  
6677 BUSCH BLVD  
COLUMBUS OH43229

\*HARRIS, ERRIN C.  
AMERICAN MUNICIPAL POWER, INC.  
1111 SCHROCK ROAD SUITE 100  
COLUMBUS OH43229

\*DUNN, JAMES MR.  
OE RETAIL SERVICES LLC  
12385 TOWNSHIP RD. 215  
FINDLAY OH45840

\*FLAHIVE, DEVAN K. MS.  
PORTER WRIGHT MORRIS & ARTHUR LLP  
41 SOUTH HIGH STREET SUITE 2900  
COLUMBUS OH43215

\*WALSTRA, NICHOLAS, PUCO  
180 E BROAD ST  
COLUMBUS OH43215

\*BUTLER, MATT MR.  
PUBLIC UTILITIES COMMISSION OF OHIO  
180 E. BROAD ST.  
COLUMBUS OH43215

RERICHA, ANNE M.  
FIRSTENERGY SERVICE CO  
76 S MAIN ST  
AKRON OH44308

\*BOJKO, KIMBERLY W. MRS.  
CARPENTER LIPPS & LELAND LLP  
280 NORTH HIGH STREET  
280 PLAZA SUITE 1300  
COLUMBUS OH43215

\*GARCIA-SANTANA, HECTOR  
AMERICAN ELECTRIC POWER SERVICE CORP  
1 RIVERSIDE PLAZA 29TH FL  
COLUMBUS OH43215

VAYSMAN, LARISA  
DUKE ENERGY OHIO INC  
139 EAST FOURTH STREET, ML 1303  
CINCINNATI OH45202

\*GREENE, TRACY J. MRS.  
OHIO CONSUMERS' COUNSEL  
65 EAST STATE ST. 7TH FLOOR  
COLUMBUS OH43215

\*CHILCOTE, HEATHER A.  
PUBLIC UTILITIES COMMISSION OF OHIO  
180 EAST BROAD STREET  
COLUMBUS OH43215

\*PRITCHARD, MATTHEW R. MR.  
MCNEES WALLACE & NURICK  
21 EAST STATE STREET 17TH FLOOR  
COLUMBUS OH43215

\*COCHERN, CARYS  
DUKE ENERGY  
155 EAST BROAD ST 20TH FLOOR  
COLUMBUS OH43215

DEAN, EVAN K.  
AMERICAN TRANSMISSION SYSTEMS INC  
76 S MAIN ST  
AKRON OH 44308

PJM INTERCONNECTION LLC  
EVELYN R. ROBINSON  
2750 MONROE BLVD.  
AUDUBON PA 19403

AEP OHIO TRANSMISSION COMPANY INC  
HECTOR GARCIA-SANTANA  
1 RIVERSIDE PLAZA, 29TH FLOOR  
COLUMBUS OH 43215-2373

AMERICAN MUNICIPAL POWER INC SR VP &  
GEN COUNSEL OF REG AFFAIRS  
LISA G MCALISTER  
1111 SCHROCK RD STE 100  
COLUMBUS OH 43229

AMERICAN MUNICIPAL POWER, INC. AND OHIO  
MUNICIPAL ELECTRIC  
ERRIN C. HARRIS  
1111 SCHROCK ROAD, SUITE 100  
COLUMBUS, OHIO 43

DAYTON POWER AND LIGHT COMPANY,  
DBA AES OHIO CHIEF REG COUNSEL  
RANDALL V GRIFFIN  
1056 WOODMAN DR  
DAYTON OH 45432

D'ASCENZO, ROCCO O  
JEANNE W KINGERY  
DUKE ENERGY OHIO  
139 E FOURTH ST 1303 MAIN  
CINCINNATI OH 45202

INDEPENDENT MARKET MONITOR FOR PJM ,  
MONITORING ANALYTICS LLC PRES  
JOSEPH E BOWRING  
2621 VAN BUREN AVE STE 160  
EAGLEVILLE PA 19403

INDUSTRIAL ENERGY USERS OF OHIO  
GLOVER, REBEKAH J.  
MATTHEW R. PRITCHARD  
MCNEES WALLACE & NURICK LLC  
21 E. STATE STREET 17TH FLOOR  
COLUMBUS OH 43215

OHIO CONSUMERS' COUNSEL  
ANGELA O'BRIEN  
65 EAST STATE STREET, 7TH FLOOR  
COLUMBUS OH 43215

OHIO POWER COMPANY DBA AEP OHIO  
STEVEN T. NOURSE  
1 RIVERSIDE PLAZA 29TH FLOOR  
COLUMBUS OH 43215

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Summary: Comments Ohio Energy Group (OEG) Reply Comments electronically filed by Mr. Michael L. Kurtz on behalf of Ohio Energy Group