

BEFORE THE POWER SITING BOARD OF THE STATE OF OHIO

In the Matter of the Application of AEP Ohio)
Transmission Company, Inc. for the Second) **Case No. 21-0805-EL-BTA**
Amendment to the Glencoe-Speidel 138 kV)
Transmission Line Project)

Members of the Board:

Chair, Public Utilities Commission	Ohio House of Representatives
Director, Department of Development	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 Ohio Revised Code (R.C.) 4906.03 and Ohio Administrative Code (Ohio Adm.Code) 4906-6.

Respectfully Submitted,



Theresa White
Executive Director
Ohio Power Siting Board

OPSB STAFF REPORT OF INVESTIGATION

Case Number: 21-0805-EL-BTA (associated prior case nos. 19-1741-EL-BTA and 18-0279-EL-BTX)
Project Name: Second Amendment to the Glencoe-Speidel 138 kV Transmission Line Project
Project Location: Belmont County
Applicant: AEP Ohio Transmission Company, Inc.
Application Filing Date: August 19, 2021
Filing Type: Amendment
Inspection Date: September 2, 2021
Report Date: November 2, 2021
Applicant's Waiver Requests: None
Staff Assigned: T. Crawford, J. Pawley, 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 Transmission Company, Inc (AEP Ohio Transco or Applicant) proposes a second amendment to the Glencoe-Speidel 138 kilovolt (kV) transmission line rebuild project which was approved by the Ohio Power Siting Board (OPSB) on February 21, 2019 in Case No. 18-0279-EL-BTX and subsequently amended in Case No. 19-1741-EL-BTA on January 16, 2020. Proposed adjustments were proffered following advanced detailed engineering and advanced site study for the amended preferred route.

Applicant states that detailed engineering of the transmission line after the OPSB approval of the preferred route has progressed since the submittal of the amendment application. There became a need for one alignment change which was found to be necessary along the preferred route. This would directly affect four of the structures along the preferred route. The need for the facility and the grid impacts associated with the facility are the same as those presented in the original case 18-0279-EL-BTX and the amendment 19-1741-EL-BTA. This proposed second amendment would not change the number of structures for the Glencoe-Speidel 138 kV line, but would only shift locations of selected structures within the 100-foot right-of-way. These changes are categorized by the Applicant as engineering adjustments of the alignment previously approved by the OPSB.

The Glencoe-Speidel 138 kV line rebuild project was originally approved as a rebuild involving 12.7 miles of the existing Glencoe-Speidel 69 kV transmission line to 138 kV standards.

Rebuilding the line to 138 kV standards would reduce the risk of overloading the line, decrease service interruptions, and improve reliability for the area customers.

Upgrades to the transmission system are part of PJM Interconnection, LLC's (PJM) Regional Transmission Expansion Planning (RTEP) process.¹ The project was submitted to PJM as a supplementary project improvement project and was reviewed on July 26, 2016 at the PJM Subregional RTEP Committee – Western meeting. The project was assigned the supplemental identifier s1158.² Supplemental projects or upgrades refer to transmission expansions or enhancements not needed to comply with PJM reliability, operational performance, Federal Energy Regulatory Commission (FERC) Form No. 715 criteria, economic planning, and public policy planning (State Agreement Approach).³

The Applicant began construction of the project in February 2020 with an anticipated in-service date of December 2021. The capital cost of the entire rebuild project is estimated to be approximately \$32,356,623.⁴

Structure Location Adjustments

The proposed adjustments to the preferred route were shown in Exhibit 1 and Exhibit 2 of the Amendment #2 to the Application. These adjustments were made due to issues of hilly terrain and construction restrictions. Applicant further states there would be no additional environmental impacts.

Structures 22-23: These two structures would be shifted 76 and 96 feet, respectively, southward from their proposed locations to remove them from a hillside that is too steep for the safe construction of a new pole line.

Structures 24-25: These two structures would be shifted 48 and 11 feet, respectively to converge back to the OPSB-Approved Route from Case No. 18-0279-EL-BTX due to the relocation of structures 22 and 23 from the steep hillside.

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

The proposed adjustments of the four structures would require six new land owners to be in the proposed right-of-way. The Applicant states that its right-of-way representatives are presently working to obtain the necessary easements from these landowners.

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/20160726/20160726-reliability-analysis-update.ashx> (Accessed August 24, 2021).

3. PJM Manual 14B: PJM Region Transmission Planning Process, Revision 49, Effective Date: June 23, 2021.

4. The Applicant indicates in a September 1, 2021 response to a data request that the cost of the rebuild project is a Class 2 estimate, and pursuant to the PJM Open Access Transmission Tariff (OATT), the cost will be recovered in the Applicant's FERC formula rate (Attachment H-20 to the PJM OATT), and would be allocated to the AEP Zone.

Nature of Impacts

Social Impacts

Staff finds that the proposed adjustments are not expected to significantly alter existing land uses, including agricultural and residential land. The number of originally approved structures would not change, as no new structures are proposed in this amendment, only the location of four structures would change. The adjustments are primarily proposed as a result of final engineering-related adjustments to the approved preferred route to avoid terrain difficult to perform necessary construction activities and future maintenance. The Applicant states that there is an increased risk of hillside slippage at the previously approved structure locations for these four structures. With the proposed adjustments, no additional residential structures would be located within 200 feet of the right-of-way.

The rebuild project has previously 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 project would not be expected to impact cultural resources. Staff agrees with this conclusion.

Surface Waters

The proposed adjustment would not impact any surface water resources. Adherence to the conditions of the original certificate would minimize impacts to surface waters.

Threatened and Endangered Species⁵

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.

Conclusion

Staff recommends approval of this amendment provided 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 rate making proceeding.

Conditions

- (1) The Applicant shall continue to adhere to all conditions of the Opinion, Order and Certificate for the Glencoe-Speidel 138 kilovolt rebuild project in Case Nos.

5. Based on agency coordination with the U.S. Fish and Wildlife Services and the Ohio Department of Natural Resources (ODNR), identified listed species of concern are generally defined as including those species that are protected under the federal Endangered Species Act of 1973, as amended (16 U.S.C. §§ 1531-1544), and/or according to the Conservation of Natural Resources within RC Title XV (§ 1518.01-1518.99; 1531.25, 1531.99, etc.).

One of the missions of the ODNR is to “conserve and improve the fish and wildlife resources and their habitats, and promote their use and appreciation by the public so that these resources continue to enhance the quality of life for all Ohioans.” In carrying out this mission, the ODNR considers the “status of native wildlife species [to be] very important” and therefore lists wildlife species needing protection. (ODNR, *State Listed Species*, <https://ohiodnr.gov/wps/portal/gov/odnr/discover-and-learn/safety-conservation/about-ODNR/wildlife/state-listed-species>). In addition to endangered species, those species classified as “threatened” are considered during OPSB project planning and approval because these species are those “whose survival in Ohio is not in immediate jeopardy, but to which a threat exists. Continued or increased stress will result in it becoming endangered.”

18-0279-EL-BTX and 19-1741-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.
- (3) 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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Case No(s). 21-0805-EL-BTA

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