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November 18, 2021

Ms. Tanowa Troupe, Secretary  
Ohio Power Siting Board  
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Columbus, Ohio 43215-3793

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**RE: In the Matter of the Construction Notice Application of Ohio Power Company for a Certificate of Environmental Compatibility and Public Need for the Hartman Farms 138 kV Extension No. 5 and No 6 Project Case No. 21-1057-EL-BNR**

Dear Ms. Troupe:

On October 28, 2021, Ohio Power Company (the “Company”) filed its Construction Notice Application for the above-referenced Project. The Wetland Delineation Report in Appendix D of the Application provided inaccurate information.

The Company hereby files this notice to inform you of the accurate information that was delineated and reported for the Project, which matches Section B(10)(f) Area of Ecological Concern, within the Application. A copy of the report is attached hereto.

If you have any questions regarding this information, please do not hesitate to contact me.

Respectfully submitted,

/s/ Hector Garcia

Hector Garcia (0084517), Counsel of Record  
Counsel for AEP Ohio Transmission Company, Inc.

cc: John Jones, Counsel OPSB Staff  
Jon Pawley, OPSB Staff



# HARTMAN FARMS 138 KV EXTENSION NO. 5 AND NO. 6 PROJECT ENVIRONMENTAL SURVEY REPORT



PROJECT NO.: LP2043151.106  
DATE: OCTOBER 2021

AEP Transmission  
8600 Smith's Mill Road  
New Albany, OH 43054



WSP USA  
312 ELM STREET, SUITE 2500  
CINCINNATI, OH 45202



WSP.COM



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# 1 INTRODUCTION

On behalf of American Electric Power (AEP) Ohio Transmission Company, Inc. (AEP Ohio Transco), WSP USA (WSP) conducted environmental surveys for the proposed Hartman Farms 138 kV Extension No. 5 and No. 6 Project (“Project”), located in Hamilton Township, Franklin County, Ohio. The environmental survey included a wetland and water resource delineation and characterization of potential habitat for state and federally listed species. The wetland delineation was performed to determine whether wetlands and streams are present within the vicinity of the Project that would meet the definition of Waters of the United States (WoUS) or be subject to regulations implemented by the Ohio Environmental Protection Agency (OEPA), and to document their extents and current conditions if present. The wetland delineation was performed by individuals trained in the three-parameter methodology (hydrophytic vegetation, wetland hydrology, and hydric soils) adopted by the U.S. Army Corps of Engineers (USACE) as outlined in the USACE *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Midwest Region (Version 2.0)* (USACE, 2010) and in the *Corps of Engineers Wetlands Delineation Manual* (Environmental Laboratory, 1987).

The report presents the results of the ecological considerations and review of the site’s existing and reasonably foreseeable site conditions at the time of the environmental surveys. The results cannot apply to site changes occurring after the survey which WSP has not had the opportunity to review. During the course of any survey, site conditions may change over time due to human and/or natural causes; as such, the results presented in this report may be invalidated, either wholly or in part, by changes beyond the control of WSP.



## 2 BACKGROUND INFORMATION

### 2.1 PROJECT AREA

The Project is located within Hamilton Township, Franklin County, Ohio. The Project Environmental Survey Corridor (ESC) is 0.29 miles long and begins at the location of the proposed Cyprus Station, located west Parsons Avenue (39.855800°, -82.991100°) and continues south to the approximate future location of a proposed customer facility (39.852300°, -82.992300°) (Figure 1, Appendix A). The approximately 7.9-acre ESC is within the Lockbourne, Ohio U.S. Geological Survey (USGS) 7.5-minute topographic map quadrangle boundary. Table 2-1 provides an overview of the project location.

**TABLE 2-1: GENERAL PROJECT INFORMATION**

<b>COUNTY:</b>	Franklin
<b>TOWNSHIP:</b>	Hamilton Northern Terminus:
<b>COORDINATE:</b>	Northern Terminus: 39.855800°, -82.991100° Southern Terminus: 39.852300°, -82.992300°
<b>USGS QUADRANGLE:</b>	Lockbourne, Ohio
<b>ENVIRONMENTAL SURVEY AREA SIZE (ac.):</b>	7.9
<b>ELEVATION RANGE (ft. above sea level):</b>	720 - 740
<b>8-DIGIT HYDROLOGIC UNIT CODE:</b>	05060001
<b>12-DIGIT HYDROLOGIC UNIT CODE(S) :</b>	05060001-23-03
<b>DATE(S) OF SURVEY :</b>	April 7, 2021

#### 2.1.1 DRAINAGE BASINS

All streams in the vicinity of the ESC drain to the Scioto River, a traditionally navigable waterway (TNW). The ESC is located entirely within the Upper Scioto drainage basin, hydrologic unit code (HUC 05060001). The ESC lies within one 12-digit HUCs, as outlined in Table 2-2 (USDA, 2019). The OEPA *401 Water Quality Certification for the Nationwide Permits Web Mapping Application* indicates that field-assessed streams within all 12-digit sub-watersheds are “ineligible”; this indicates that stream impacts within the ESC are eligible for coverage under an Individual Section 401 Water Quality Certification (WQC) for the USACE Nationwide Permits (OEPA, 2020).

**TABLE 2-2: 12-DIGIT HUC'S CROSSED BY THE PROJECT**

<b>8-DIGIT HUC CODE<sup>1</sup></b>	<b>8-DIGIT HUC CODE NAME<sup>1</sup></b>	<b>12-DIGIT HUC CODE<sup>1</sup></b>	<b>12-DIGIT HUC NAME<sup>1</sup></b>	<b>OHIO EPA SECTION 401 ELIGIBILITY<sup>2</sup></b>
05060001	Upper Scioto	05060001-23-03	Grant Run-Scioto River	Ineligible

<sup>1</sup>Source: USDA, 2019

<sup>2</sup>Source: OEPA, 2020



## 3 METHODOLOGY

On April 7, 2021, a WSP ecologist traversed the approximately 7.9-acre ESC to conduct a wetland and waters delineation. The physical boundaries of aquatic resources were recorded using a Trimble Global Positioning System (GPS) unit rated for sub-decimeter accuracy. The GPS data was then geo-corrected using Trimble GPS Pathfinder Office software (version 5.60) and reviewed for quality control.

Prior to conducting field surveys, the WSP ecologist completed a desktop review by analyzing several federal and state documents for the presence of wetland and streams. This review included Natural Resources Conservation Service (NRCS) soil survey data, U.S. Fish and Wildlife Service (USFWS) National Wetland Inventory (NWI) maps of Ohio, USGS 7.5-minute topographic maps, and USGS National Hydrography Dataset (NHD) stream and river data as an exercise to identify the occurrence and location of potential wetlands and streams.

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### 3.1 WETLAND AND STREAM DELINEATION

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#### 3.1.1 WETLAND DELINEATION

The USACE and the U.S. Environmental Protection Agency (USEPA) define wetlands as areas inundated or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions (33 CFR, Part 328.3).

Wetlands were delineated according to Section 404 of the Clean Water Act, Technical Report Y-87-1 *Corps of Engineers Wetlands Delineation Manual ('87 Manual)* (Environmental Laboratory, 1987), and the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Midwest Region, (Version 2.0) (Regional Supplement)* (USACE, 2010). Representative data points were collected for wetlands and corresponding, adjacent upland areas. Wetland data was recorded on the USACE *Regional Supplement Wetland Determination Data Forms*.

Wetland vegetation communities were classified according to the *Classification of Wetlands and Deepwater Habitats of the United States*, commonly referred to as the Cowardin Classification System (Cowardin et al., 1979). Wetlands within the ESC were assessed using the OEPA *Ohio Rapid Assessment Method for Wetlands v. 5.0* (ORAM) to determine the ecological quality and level of disturbance (Mack, 2001).

Limits of federal jurisdiction of wetlands and other waters have been preliminarily determined based on the 2020 *Navigable Waters Protection Rule*. Wetlands and ephemeral streams that do not fall under the jurisdiction of the USACE fall under the regulatory authority of the OEPA. Final determination of jurisdictional status is made by the USACE.

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#### 3.1.2 STREAM DELINEATION AND ASSESSMENT

Streams were identified by the presence of a defined bed and bank, and evidence of an ordinary high water mark (OHWM). The OHWM is defined in the USACE *Regulatory Guidance Letter No. 05-05* (USACE, 2005). Generally, the OHWM is identified by a clearly defined, natural line along the stream bank created by fluctuations and flow of water; this may include changes in contours, substrate, vegetation, and debris (USACE, 2005).



Stream assessments were conducted using the methods described in the OEPA's Methods for Assessing Habitat in Flowing Waters: Using OEPA's *Qualitative Habitat Evaluation Index* (Rankin, 2006) and *Field Evaluation Manual for Ohio's Primary Headwater Habitat Streams, Version 3* (Davic, 2012).



## 4 RESULTS

A WSP ecologist surveyed the Project on April 7, 2021 by walking the approximately 7.9-acre ESC and evaluating for wetlands and other WoUS. WSP did not identify ponds, wetlands, or streams within the ESC. The absence of features identified within the ESC are depicted on the Delineated Features Map (Figure 3, Appendix A).

### 4.1 DESKTOP REVIEW

#### 4.1.1 SOILS EVALUATION

According to the NRCS Soil Data for Franklin County, Ohio, there are three soil map units shown within the ESC, as presented in Table 4-1. The soils observed by the WSP ecologist during the reconnaissance of the ESC were consistent with the NRCS soil survey mapping.

**TABLE 4-1: SOIL UNITS MAPPED WITHIN THE ESC**

SOIL UNIT SYMBOL	SOIL UNIT NAME	PERCENT HYDRIC	HYDRIC RATING <sup>1</sup>	AREA WITHIN ESC (ac.)
EIB	Ellsworth silt loam, 2 to 6 percent slopes	0	Non-Hydric	3.16
EIC2	Eldean silt loam, 6 to 12 percent slopes, eroded	0	Non-Hydric	4.28
EID2	Eldean silt loam, 12 to 18 percent slopes, eroded	0	Non-Hydric	0.45

Total Area of Non-Hydric Soils 7.9

<sup>1</sup>Non-Hydric = 0% hydric soil component; Predominantly Non-Hydric = 1-32%; Partially Hydric = 33-65%; Predominantly Hydric = 66-99%; and All Hydric = 100%.

Source: Soil Survey Staff, NRCS. Web Soil Survey.

#### 4.1.2 NATIONAL WETLAND INVENTORY REVIEW

According to the NWI maps of the Lockbourne, Ohio quadrangle, there are no mapped NWI features within the ESC. Locations of the NWI mapped wetlands in the vicinity of the ESC are shown on Figure 2 (Appendix A).

#### 4.1.3 FEMA FLOODPLAIN REVIEW

According to Federal Emergency Management Agency (FEMA) National Flood Hazard Layer there are no mapped flood hazard areas within the ESC.

### 4.2 DELINEATED WETLANDS

During environmental surveys of the ESC, the WSP ecologist did not identify any wetlands. Representative photographs were taken within the ESC and are provided in Appendix B.

## 4.3 STREAMS AND RIVERS

During the environmental survey, the WSP ecologist did not identify any streams within the ESC.

## 4.4 PONDS AND OPEN WATER

During the environmental survey, the WSP ecologist did not identify any streams within the ESC.

## 4.5 VEGETATIVE COMMUNITIES

The WSP ecologist conducted a general habitat survey in conjunction with the stream and wetland field surveys. A variety of woody and herbaceous habitats, as described below in Table 4-2, are present within the ESC. A breakdown of vegetated land cover is provided, overlain on aerial photography in Figure 4 (Appendix A).

**TABLE 4-2: VEGETATIVE COMMUNITIES WITHIN THE ESC**

VEGETATIVE COMMUNITY	DESCRIPTION	ACREAGE WITHIN THE ESC	PERCENTAGE OF ESC
Agricultural Land	Agricultural land primarily consisting of soybean and corn fields were present within the ESC.	7.2	91.14%
Successional Hardwood Woodland <sup>1</sup>	Successional hardwood woodlands were present within the ESC. Dominant woody species within these areas include red maple ( <i>Acer rubrum</i> ) and shagbark hickory ( <i>Carya ovata</i> ). These areas were in the process of being cleared at the time of the environmental survey.	0.33	4.18%
Grassland	Herbaceous cover exists alongside roads, field borders, and abandoned fields within the ESC in the form of old-field communities. These communities are an early stage of succession following disturbance. This community type is generally short-lived unless periodically re-disturbed.	0.14	1.77%
Developed, Low Intensity	Areas primarily devoid of any significant vegetation, typically routinely maintained areas that consist of a monoculture of low-growth grasses and forbs.	0.23	2.91%
<b>Total</b>		<b>7.9</b>	<b>100.0%</b>

<sup>1</sup>Tree clearing was in progress throughout the ESC at the time of the environmental survey.

## 4.6 THREATENED AND ENDANGERED SPECIES COORDINATION

WSP conducted a rare, threatened, and endangered species review for areas within the ESC. Requests for review were submitted to the ODNR and USFWS on July 7, 2021. Correspondence from the USFWS and ODNR is included as Appendix C. Table 4-3 provides a list of species of concern previously identified in the ESC.

#### 4.6.1 USFWS COORDINATION

A request for review was submitted to the USFWS on July 7, 2021. In an email dated July 19, 2021 the USFWS provided comments on the Project with regard to federally-listed threatened and endangered species within the Project vicinity. The USFWS indicated that there are no federal wildlife refuges, wilderness areas, or critical habitat within the vicinity of the Project. Comments from USFWS regarding protected species are provided in Table 4-4. Comments from USFWS are included in Appendix C.

#### 4.6.2 ODNR COORDINATION

A request for Environmental Review was submitted to the ODNR on July 7, 2021. The request for Environmental Review which was submitted to ODNR has been included in Appendix C. ODNR's response will be added to this report once it is received.

The ODNR Environmental Review, dated September 1, 2021 included comments from the Ohio Natural Heritage Database Program, Division of Wildlife (DOW), and Division of Water Resources. A review of Natural Heritage Database identified no records of state-listed species, rare habitats, or managed areas within the Project area. However, multiple species were within a one-mile radius of the ESC. Comments from ODNR regarding protected species are provided in Table 4-3. The ODNR Environmental Review has been included as Appendix C.

**TABLE 4-3. LISTED SPECIES COMMENTED ON BY ODNR AND USFWS**

COMMON NAME (SCIENTIFIC NAME)	STATE STATUS	FEDERAL STATUS	HABITAT DESCRIPTION	POTENTIAL HABITAT OBSERVED IN ESC	AGENCY COMMENT	IMPACT ASSESSMENT
Mammals						
Indiana bat ( <i>Myotis sodalis</i> )	Endangered	Endangered	Winter hibernacula are provided by caves and mines. Summer roost habitat typically includes live or dead trees with exfoliating bark, crevices, or cavities that can be used for roosting. Open sub-canopy areas and flight corridors are important to allow maneuvering during foraging. Proximity to water sources provides a greater density of insect prey.	No	The ESC is within the range of these species. ODNR recommends that tree clearing only occur from October 1 through March 31. ODNR further recommends that a desktop habitat assessment be conducted to determine if there are potential hibernacula within the vicinity of the ESC.	Potentially suitable habitat may have been provided by forested areas within the ESC.
Northern long-eared bat ( <i>Myotis septentrionalis</i> )	Threatened	Threatened				However, forested areas visible on aerial imagery were being cleared at the time of the environmental survey. No potential hibernacula were identified within 0.5-miles of the ESC.
Little brown bat ( <i>Myotis lucifugus</i> )	Endangered	Not Listed				
Tri-colored bat ( <i>Perimyotis subflavus</i> )	Endangered	Not Listed				
Birds						



**TABLE 4-3. LISTED SPECIES COMMENTED ON BY ODNR AND USFWS**

COMMON NAME (SCIENTIFIC NAME)	STATE STATUS	FEDERAL STATUS	HABITAT DESCRIPTION	POTENTIAL HABITAT OBSERVED IN ESC	AGENCY COMMENT	IMPACT ASSESSMENT
American bittern ( <i>Botaurus lentiginosus</i> )	Endangered	Not Listed	Large undisturbed wetlands with scattered small pools and dense vegetation. They occasionally occupy bogs, large wet meadows, and dense shrubby swamps.	No	ODNR has recommended that potential nesting habitat be avoided during the May 1 <sup>st</sup> to July 31 <sup>st</sup> nesting period.	Potentially suitable habitat was not identified within the Project ESC.
Black-crowned night-heron ( <i>Nycticorax nycticorax</i> )	Threatened	Not Listed	Nest in small trees, saplings, shrubs, or sometimes on the ground, near bodies of water and wetlands.	No		
Upland sandpiper ( <i>Bartramia longicauda</i> )	Endangered	Not Listed	Nesting habitat is provided in grasslands, pastures, and old-field areas.	No	ODNR has recommended that potential nesting habitat be avoided during the April 15 <sup>th</sup> to July 31 <sup>st</sup> nesting period.	Potentially suitable habitat was not identified within the Project ESC.
cattle egret ( <i>Bubulcus ibis</i> )	Endangered	Not Listed	Not strictly wetland birds. They often forage in dry pastures and fields. Egrets nest in colonies and will build a nest out of sticks and other materials wherever it can be supported.	No	ODNR has recommended that potential nesting habitat be avoided during the May 15 <sup>th</sup> to August 15 <sup>th</sup> nesting period.	Potentially suitable habitat was not identified within the Project ESC.
lark sparrow ( <i>Chondestes grammacus</i> )	Endangered	Not Listed	Nests in grassland habitats with scattered shrub layers, disturbed open areas, as well as patches of bare soil. In the Oak Openings area west of Toledo, lark sparrows occupy open grass and shrubby fields along sandy beach ridges.	No	ODNR has recommended that potential nesting habitat be avoided during the May 1 <sup>st</sup> to June 30 <sup>th</sup> nesting period.	Potentially suitable habitat was not identified within the Project ESC.
least bittern ( <i>Ixobrychus exilis</i> )	Threatened	Not Listed	Prefers dense emergent wetlands with thick stands of herbaceous vegetation interspersed with woody vegetation and open water.	No	ODNR has recommended that potential nesting habitat be avoided during the May 1 <sup>st</sup> to July 31 <sup>st</sup> nesting period.	Potentially suitable habitat was not identified within the Project ESC.
northern harrier ( <i>Circus hudsonis</i> )	Endangered	Not Listed	Nesters are much rarer, although they occasionally breed in large marshes and grasslands. The female builds a nest out of sticks on the ground, often on top of a	No	ODNR has recommended that potential nesting habitat be avoided during the May	Potentially suitable habitat was not identified within the ESC.



**TABLE 4-3. LISTED SPECIES COMMENTED ON BY ODNR AND USFWS**

COMMON NAME (SCIENTIFIC NAME)	STATE STATUS	FEDERAL STATUS	HABITAT DESCRIPTION	POTENTIAL HABITAT OBSERVED IN ESC	AGENCY COMMENT	IMPACT ASSESSMENT
			mound. Harriers hunt over grasslands.		15 <sup>th</sup> to August 1 <sup>st</sup> nesting period.	
sandhill crane ( <i>Grus canadensis</i> )	Threatened	Not Listed	wetland-dependent species that roosts in shallow, standing water or moist bottomlands. On breeding grounds, they require a rather large tract of wet meadow, shallow marsh, or bog for nesting.	No	ODNR has recommended that potential nesting habitat be avoided during the April 1 <sup>st</sup> to September 1 <sup>st</sup> nesting period.	Potentially suitable habitat was not identified within the ESC.
<b>Mussels</b>						
Purple cat's paw ( <i>Epioblasma o. obliquata</i> )	Endangered	Endangered	Commonly inhabits large rivers with sandy gravel substrates. It occurs in water of shallow to moderate depth with a swift current.	No	In-water work in streams with a drainage area >5 mi <sup>2</sup> at the point of impact will require reconnaissance and/or survey efforts per the Ohio Mussel Survey Protocol.	In-water work is not anticipated; therefore, project is not likely to impact this or other aquatic species.
Clubshell ( <i>Pleurobema clava</i> )	Endangered	Endangered	Habitat is typically provided by streams and small rivers with well-oxygenated riffles and sand and gravel substrates.	No		
Northern riffleshell ( <i>Epioblasma torulosa rangiana</i> )	Endangered	Endangered	Habitat is typically provided by large streams and small rivers in firm sand of riffle areas.	No		
Rayed bean ( <i>Villosa fabalis</i> )	Endangered	Endangered	Habitat is typically provided by smaller, headwater creeks, but they are sometimes found in large rivers.	No		
Snuffbox ( <i>Epioblasma triquetra</i> )	Endangered	Endangered	Typically found in small to medium-sized creeks and some larger rivers, in areas with a swift current.	No		
Rabbitsfoot ( <i>Quadrula cylindrica cylindrica</i> )	Threatened	Threatened	Typically, occurs in a variety of flowing water habitats including small to medium-sized streams and some larger navigable rivers. It usually occurs in shallow areas along the bank.	No		



**TABLE 4-3. LISTED SPECIES COMMENTED ON BY ODNR AND USFWS**

COMMON NAME (SCIENTIFIC NAME)	STATE STATUS	FEDERAL STATUS	HABITAT DESCRIPTION	POTENTIAL HABITAT OBSERVED IN ESC	AGENCY COMMENT	IMPACT ASSESSMENT
Elephant-ear ( <i>Elliptio crassidens crassidens</i> )	Endangered	Not Listed	Primarily inhabits large rivers in mud, sand or fine gravel.	No		
Long solid ( <i>Fusconaia maculata maculate</i> )	Endangered	Not Listed	Typically, found in small to large rivers in gravel with a strong current.	No		
Ohio pigtoe ( <i>Pleurobema cordatum</i> )	Endangered	Not Listed	Commonly found in strong currents on substrates of sand and gravel.	No		
Pocketbook ( <i>Lampsilis ovata</i> )	Endangered	Not Listed	Creeks to large rivers with quiet to swift current in gravel, sand and cobble — nearly any substrate except for moving sand.	No	In-water work in streams with a drainage area >5 mi² at the point of impact will require reconnaissance and/or survey efforts per the Ohio Mussel Survey Protocol.	In-water work is not anticipated; therefore, project is not likely to impact this or other aquatic species.
Washboard ( <i>Megaloniaias nervosa</i> )	Endangered	Not Listed	Typically, a large river species, inhabiting the main channel areas of a stream. Suitable habitat consists of slow current areas with substrates composed of sand, gravel, or mud.	No		
Black sandshell ( <i>Ligumia recta</i> )	Threatened	Not Listed	most commonly occupies rivers with strong currents and lakes with a firm substrate of gravel or sand.	No		
Fawnsfoot ( <i>Truncilla donaciformis</i> )	Threatened	Not Listed	Typically occurs in flowing areas of large rivers in soft or coarse substrate.	No		
Pondhorn ( <i>Uniomereus tetralasmus</i> )	Threatened	Not Listed	This species is typically found in ponds, small creeks, and headwater streams with sand or mud substrates.	No		
Threehorn wartyback ( <i>Obliquaria reflexa</i> )	Threatened	Not Listed	Typically found in large rivers with moderate current and stable gravel, sand and mud bottoms.	No		
Fish						
Scioto madtom ( <i>Noturus trautmani</i> )	Endangered	Endangered	Prefers stream riffles of moderate current over gravel bottoms. Water must be of high	No	ODNR has recommended in-water work	No in-water work is proposed in a perennial



**TABLE 4-3. LISTED SPECIES COMMENTED ON BY ODNR AND USFWS**

COMMON NAME (SCIENTIFIC NAME)	STATE STATUS	FEDERAL STATUS	HABITAT DESCRIPTION	POTENTIAL HABITAT OBSERVED IN ESC	AGENCY COMMENT	IMPACT ASSESSMENT
			quality and free of suspended sediments.		restriction dates of March 15 <sup>th</sup> to June 30 <sup>th</sup> in perennial streams. If not in-water work is proposed in perennial streams, the Project is not likely to impact this species.	stream; therefore, project is not likely to impact this or other aquatic species.
Goldeye ( <i>Hiodon alosoides</i> )	Endangered	Not Listed	It prefers turbid slower-moving waters of lakes and rivers.	No		
Iowa darter ( <i>Etheostoma exile</i> )	Endangered	Not Listed	Occurs in clear to lightly turbid water in small cool lakes, bogs, ponds, and in slow-moving waters of small brooks to medium rivers. Primarily associated with submerged vegetation.	No		
Popeye shiner ( <i>Notropis ariommus</i> )	Endangered	Not Listed	Primarily inhabits slowly or moderately flowing rivers or creeks.	No	ODNR has recommended in-water work restriction dates of March 15 <sup>th</sup> to June 30 <sup>th</sup> in perennial streams. If not in-water work is proposed in perennial streams, the Project is not likely to impact this species.	No in-water work is proposed in a perennial stream; therefore, project is not likely to impact this or other aquatic species.
Northern brook lamprey ( <i>Ichthyomyzon fossor</i> )	Endangered	Not Listed	They are typically found in the headwaters of streams that are moderately warm and clean.	No		
Spotted darter ( <i>Etheostoma maculatum</i> )	Endangered	Not Listed	Occur in freshwater rivers marked with the presence of boulders and other rocks.	No		
Shortnose gar ( <i>Lepisosteus platostomus</i> )	Endangered	Not Listed	Habitat includes lakes, swamps, and the calm pools and backwaters of creeks and rivers. They are commonly found near vegetation and submerged logs.	No		
Tonguetied minnow ( <i>Exoglossum laurae</i> )	Endangered	Not Listed	Unable to live in murky waters and requires a clean rock river bottom, typically cool waters within forested banks of large rivers.	No		
Lake chubsucker ( <i>Erimyzon sucetta</i> )	Threatened	Not Listed	Wetlands, ponds, and floodplain lakes with still water and low turbidity.	No		
Paddlefish ( <i>Polyodon spathula</i> )	Threatened	Not Listed	Typically found in deep water of large river basins and their tributaries.	No		
Tippecanoe darter ( <i>Etheostoma tippecanoe</i> )	Threatened	Not Listed	Most commonly in medium to large streams and rivers.	No		



## 5 SUMMARY

WSP conducted environmental surveys of the Hartman Farms 138 kV Extension No. 5 and No. 6 Project on April 7, 2021. No streams, wetlands, or waterbodies were delineated by WSP within the 7.9-acre ESC.

Based on observations within the ESC during environmental surveys, USFWS comments, and ODNR comments, potential impacts to the Indiana bat and northern long-eared bat are not anticipated if the recommended seasonal clearing dates are utilized. Forested areas that would typically provide potential summer roost habitat for bat species, were located within the ESC, however forested areas had been cleared and/or impacted at the time of the environmental survey and no longer provide potential habitat to bat species during summer months.

WSP performed a desktop review for potential hibernacula within the vicinity of the Project as a result of comments from ODNR relating to state- and federally-listed bat species. Topographic maps did not depict caves, cliffs/ledges, and subsurface mines within a three-mile radius of the ESC. A review of aerial imagery also did not provide evidence of these habitat types. Documented mines or mine openings are not recorded within a three mile buffer of the Project Area. Additionally, no potential hibernacula were identified within the ESC during the field survey. Additional information pertaining to the state- and federally-listed bat species is provided in Table 4-4.

It is anticipated that in-water work is not necessary, therefore no mussel surveys or construction timing windows are necessary related to protected fish species.

Potentially suitable habitat for state and federally listed threatened and endangered bird species was not identified within the ESC since the primary habitat within the ESC was agricultural land (approximately 91% of the habitat within the ESC). Agricultural land was not within the habitat description for any of the seven bird species identified in ODNR's response, therefore the Project should not impact protected bird species.



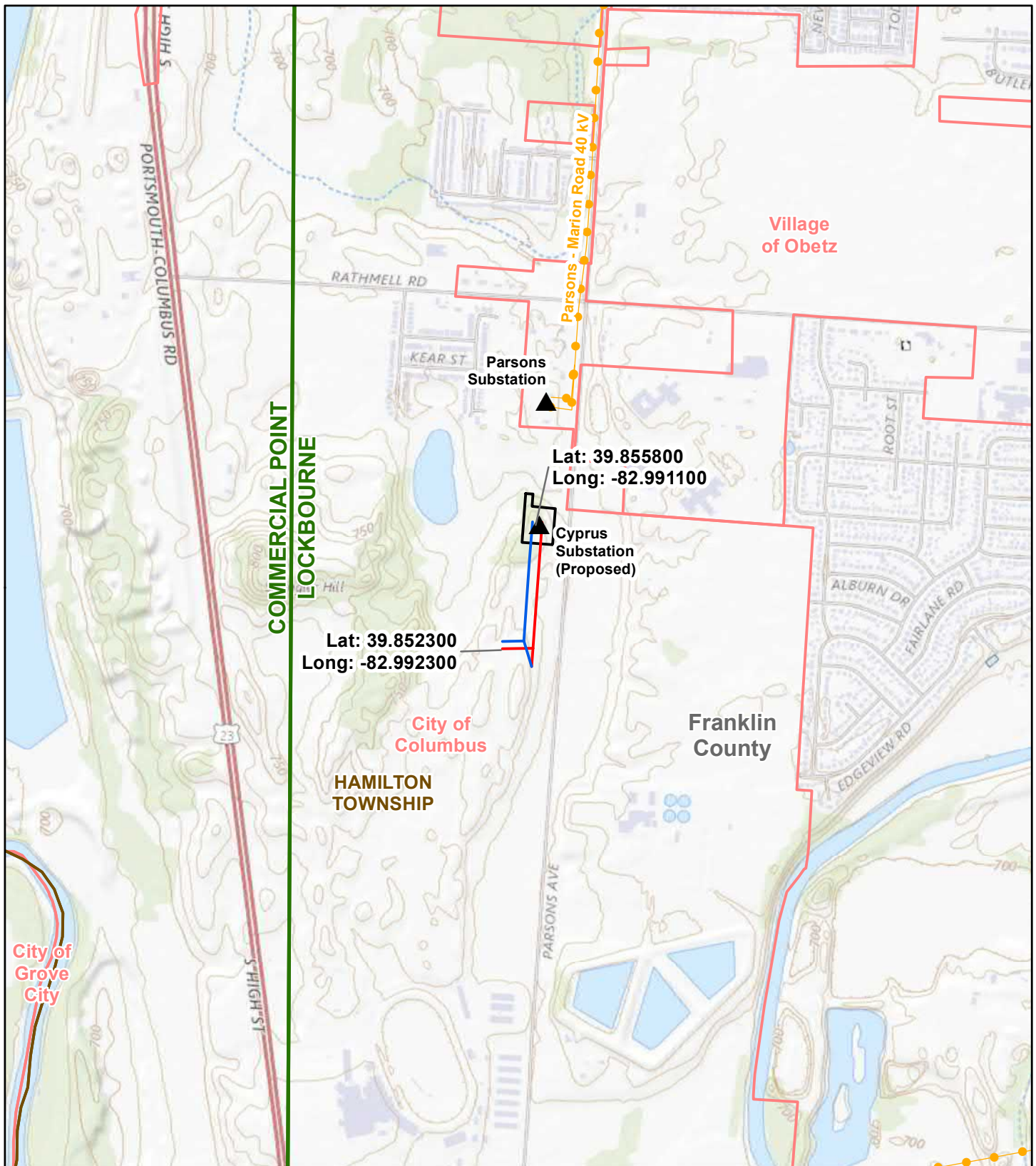


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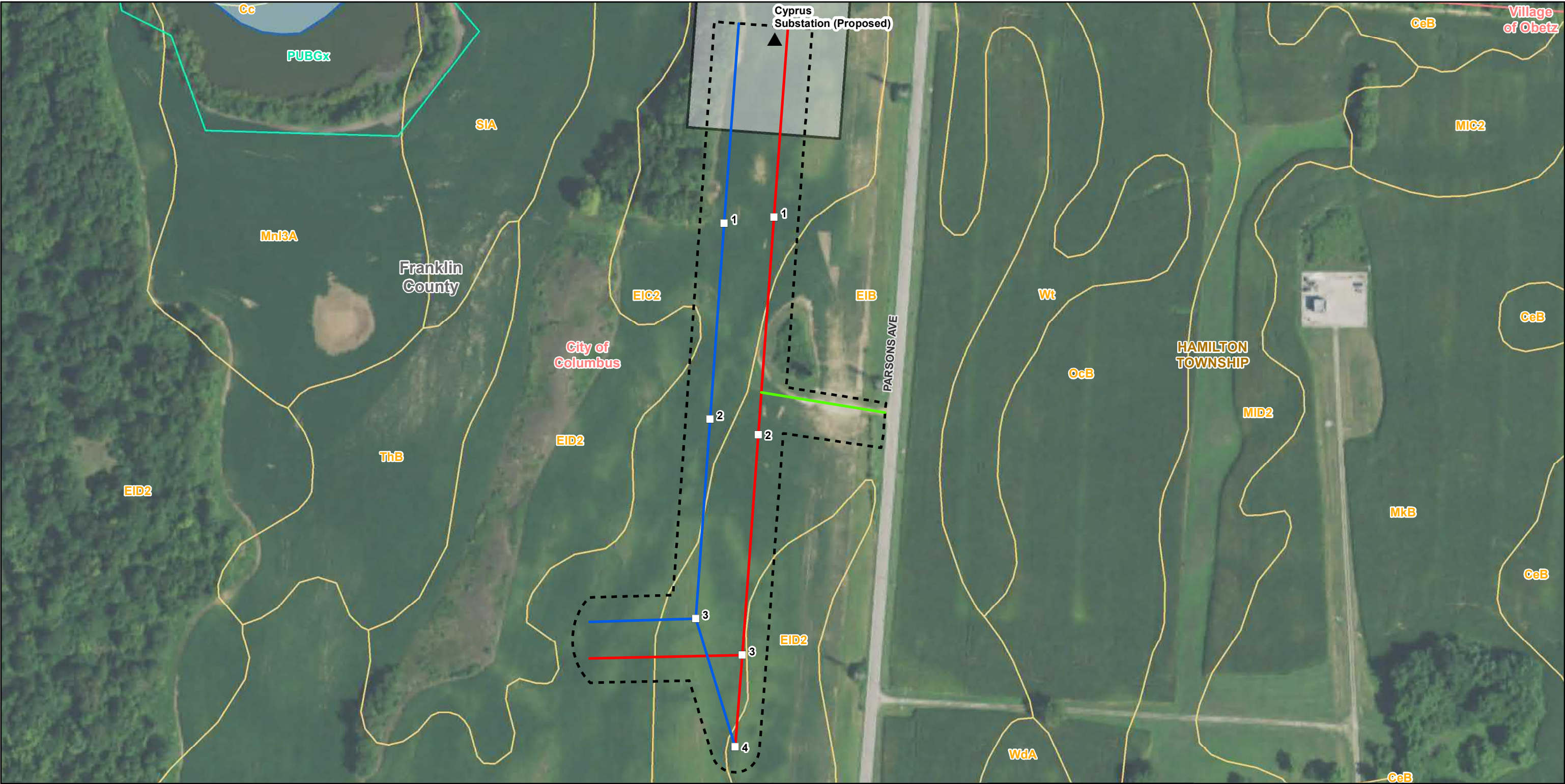
# APPENDIX

## A FIGURES



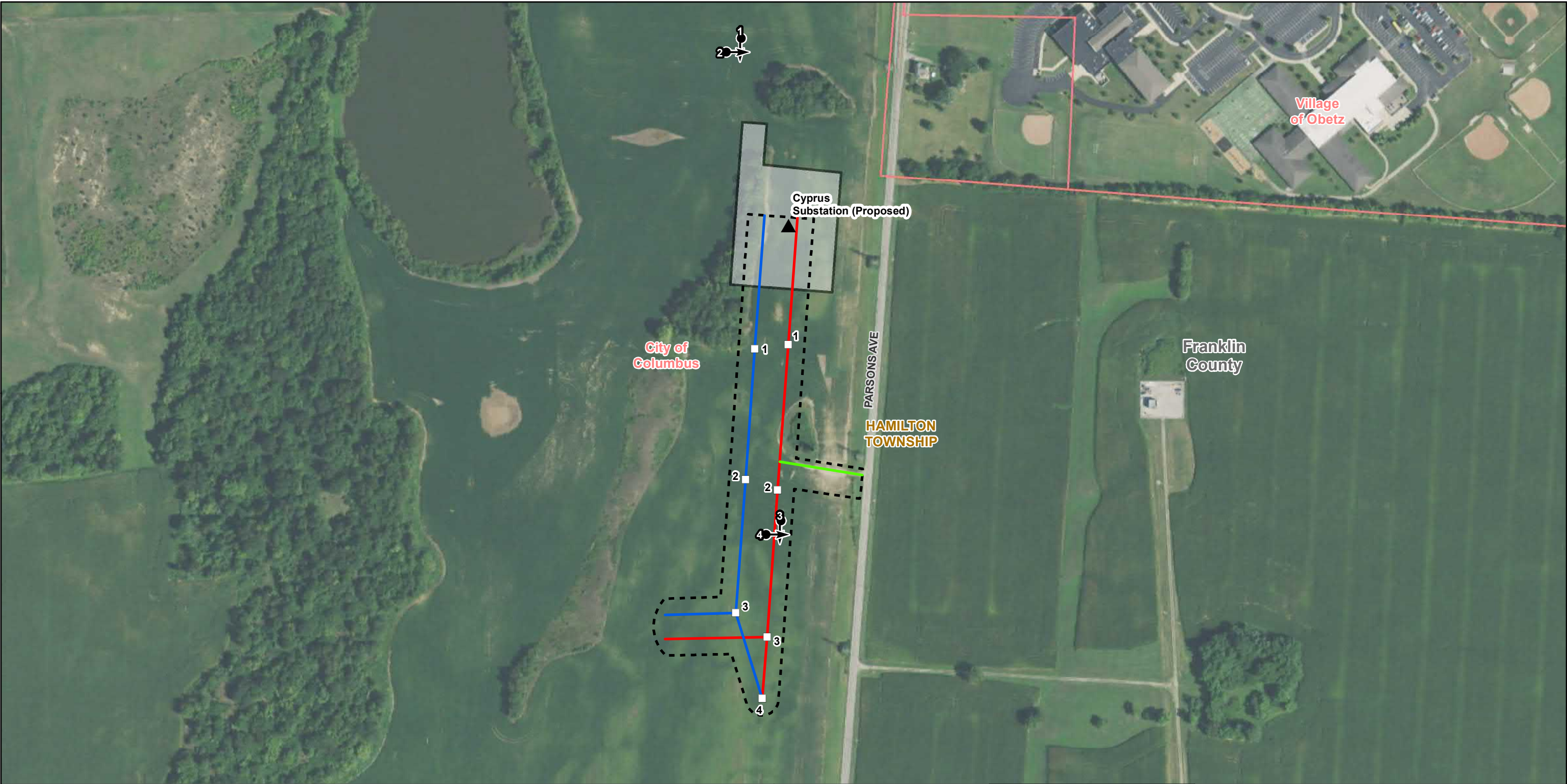
<ul style="list-style-type: none"> <li>▲ Substation</li> <li>● Existing Transmission Line</li> <li>— Hartman Farms 138 kV Extension No. 5</li> <li>— Hartman Farms 138 kV Extension No. 6</li> <li>□ Proposed Cyprus Station Boundary</li> <li>■ USGS 24k Topo Quad Boundary</li> <li>□ Municipal Boundary</li> <li>□ Township Boundary</li> <li>□ County Boundary</li> </ul>	<p>Sources: Topo (USGS) Quad Boundaries (USGS)</p> <p>Coordinate System: State Plane Ohio South NAD 1983</p> <p>September 29, 2021</p>		<p>Hartman Farms 138 kV Extension No. 5 and No. 6 Project</p> <p><b>Figure 1. Project Location Map</b></p> <div> </div> <div> <p>0 700 1,400 Feet</p> </div>
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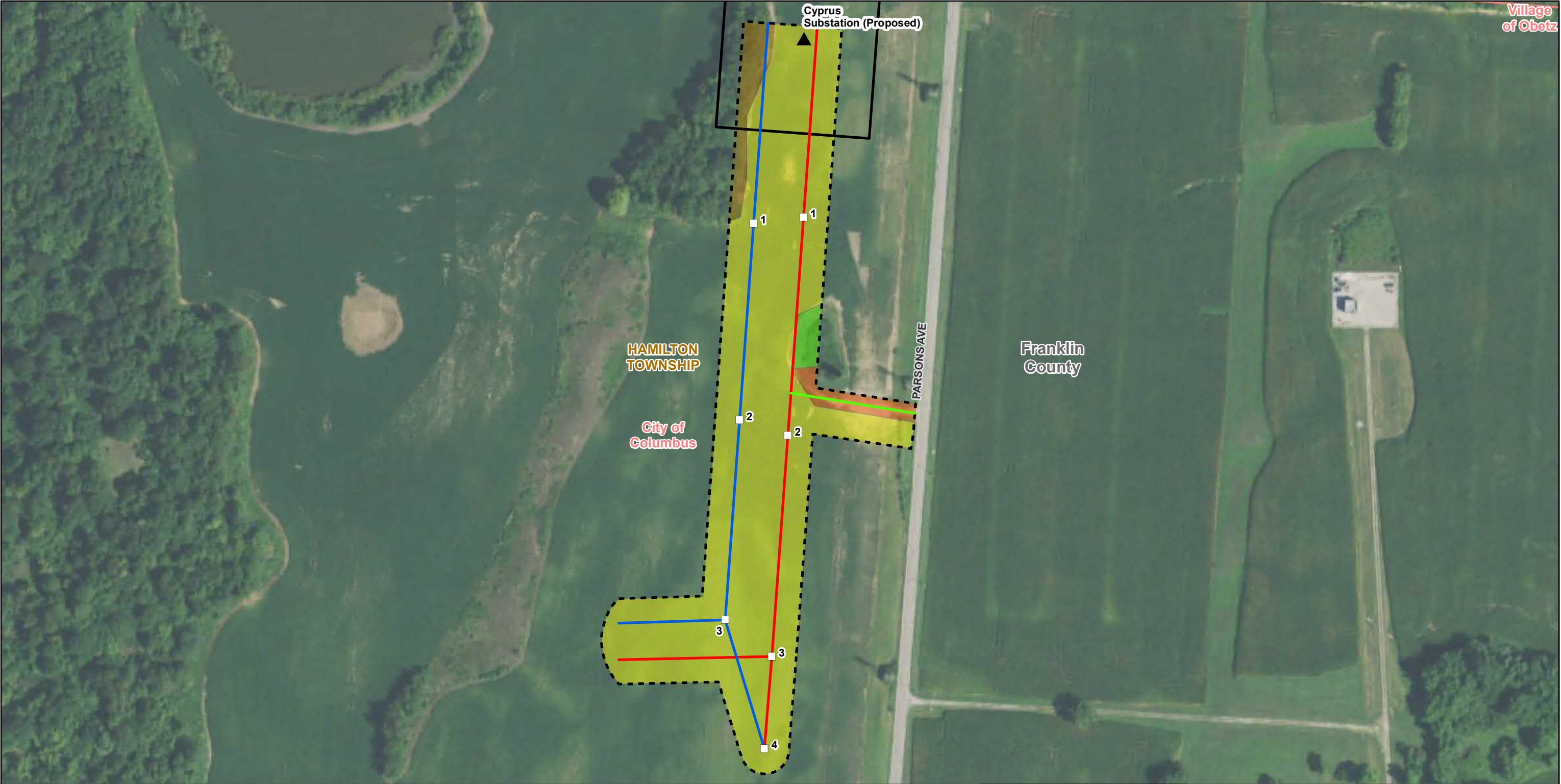
<p>▲ Substation</p> <p>□ Proposed Structure</p> <p>Existing Gravel Access</p> <p>Hartman Farms 138 kV Extension No. 5</p> <p>Hartman Farms 138 kV Extension No. 6</p> <p>Environmental Survey Corridor</p> <p>Proposed Cyprus Station Boundary</p>	<p>NWI Wetland</p> <p>NHD Waterbody</p> <p>Soil Map Unit</p> <p>Municipal Boundary</p> <p>Township Boundary</p> <p>County Boundary</p>	<p>Sources: 2019 NAIP Imagery (USDA) Wetland (USFWS) Hydrography (USGS) Soil Units (USDA) Floodplains (FEMA)</p> <p>Coordinate System: Ohio State Plane South NAD 1983</p> <p>October 8, 2021</p>		<p>HARTMAN FARMS 138 KV EXTENSION NO. 5 AND NO. 6 PROJECT</p> <p><b>Figure 2. Environmental Basemap</b></p> <div></div> <div><p>N</p><p>0 200 400 Feet</p></div>
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<p>▲ Substation</p> <p>□ Proposed Structure</p> <p><b>Photo Point</b></p> <p><b>View Direction</b></p> <p>➡ East</p> <p>⬇ South</p>	<p>— Existing Transmission Line</p> <p>— Existing Gravel Access</p> <p>— Hartman Farms 138 kV Extension No. 5</p> <p>— Hartman Farms 138 kV Extension No. 6</p> <p>--- Environmental Survey Corridor</p> <p>▒ Proposed Cyprus Station Boundary</p> <p>▭ Municipal Boundary</p>	<p>▭ Township Boundary</p> <p>▭ County Boundary</p>	<p>Sources: 2019 NAIP Imagery (USDA)</p> <p>Coordinate System: Ohio State Plane South NAD 1983</p> <p>October 8, 2021</p>		<p>HARTMAN FARMS 138 KV EXTENSION NO. 5 AND NO. 6 PROJECT</p> <p><b>Figure 3. Delineated Features</b></p> <div></div> <div><p>N</p><p>0 300 600 Feet</p></div>
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<div><div><div>▲ Substation</div><div>□ Proposed Structure</div><div>Existing Gravel Access</div><div>Hartman Farms 138 kV Extension No. 5</div><div>Hartman Farms 138 kV Extension No. 6</div><div>Environmental Survey Corridor</div><div>Proposed Cyprus Station Boundary</div></div><div><div>Agricultural Land</div><div>Developed, Low Intensity</div><div>Grassland</div><div>Successional Hardwood Woodland</div><div>Municipal Boundary</div><div>Township Boundary</div><div>County Boundary</div></div></div>	Sources: 2019 NAIP Imagery (USDA)	<div><div>HARTMAN FARMS 138 KV EXTENSION NO. 5 AND NO. 6 PROJECT</div><div>Figure 4. Vegetation Coverage</div><div><div><div>AEP OHIO</div><div>wsp</div></div><div><div>N</div><div>0200400 Feet</div></div></div></div>
	Coordinate System: Ohio State Plane South NAD 1983	
	October 8, 2021	

# APPENDIX

## B REPRESENTATIVE PHOTOGRAPHS



**HARTMAN FARMS 138 KV EXTENSION NO. 5 AND NO. 6 PROJECT WETLAND DELINEATION**

**PHOTOGRAPH 1**



Successional Hardwood Woodland habitat (recently cleared)  
and agricultural land, facing south on April 7, 2021.

**PHOTOGRAPH 2**



Agricultural land within ESC facing east on April 7, 2021.



PHOTOGRAPH 3



Agricultural land, paralleling Parsons Road facing south on April 7, 2021.

PHOTOGRAPH 4



Agricultural land within ESC facing east (Parsons Road) on April 7, 2021.

# APPENDIX

## C AGENCY COORDINATION



# Ohio Department of Natural Resources

MIKE DeWINE, GOVERNOR

MARY MERTZ, DIRECTOR

## Office of Real Estate

*John Kessler, Chief*  
2045 Morse Road – Bldg. E-2  
Columbus, OH 43229  
Phone: (614) 265-6621  
Fax: (614) 267-4764

September 1, 2021

Phil Renner  
WSP USA  
312 Elm Street  
Suite 2500  
Cincinnati, Ohio 45202

**Re:** 21-0654; Cyprus-Customer 138 kV Transmission Line Project

**Project:** The proposed project involves the involves construction of the Cyprus-Customer 138 kV Transmission Line.

**Location:** The proposed project is located in Hamilton Township, Franklin County, Ohio.

The Ohio Department of Natural Resources (ODNR) has completed a review of the above referenced project. These comments were generated by an inter-disciplinary review within the Department. These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the National Environmental Policy Act, the Coastal Zone Management Act, Ohio Revised Code and other applicable laws and regulations. These comments are also based on ODNR's experience as the state natural resource management agency and do not supersede or replace the regulatory authority of any local, state or federal agency nor relieve the applicant of the obligation to comply with any local, state or federal laws or regulations.

**Natural Heritage Database:** The Natural Heritage Database has no records at or within a one-mile radius of the project area.

A review of the Ohio Natural Heritage Database indicates there are no other records of state endangered or threatened plants or animals within the project area. There are also no records of state potentially threatened plants, special interest or species of concern animals, or any federally listed species. In addition, we are unaware of any unique ecological sites, geologic features, animal assemblages, scenic rivers, state wildlife areas, state nature preserves, state or national parks, state or national forests, national wildlife refuges, or other protected natural areas within the project area. The review was performed on the project area you specified in your request as well as an additional one-mile radius. Records searched date from 1980.

Please note that Ohio has not been completely surveyed and we rely on receiving information from many sources. Therefore, a lack of records for any particular area is not a statement that rare species or unique features are absent from that area. Although all types of plant communities have been surveyed, we only maintain records on the highest quality areas.



**Fish and Wildlife:** The Division of Wildlife (DOW) has the following comments.

The DOW recommends that impacts to streams, wetlands and other water resources be avoided and minimized to the fullest extent possible, and that Best Management Practices be utilized to minimize erosion and sedimentation.

The project is within the vicinity of records for the little brown bat (*Myotis lucifugus*), a state endangered species. Because presence of state endangered bat species has been established in the area, summer tree cutting is not recommended, and additional summer surveys would not constitute presence/absence in the area. However, limited summer tree cutting inside this buffer may be acceptable after further consultation with DOW (contact Erin Hazelton at [Erin.hazelton@dnr.ohio.gov](mailto:Erin.hazelton@dnr.ohio.gov)).

In addition, the entire state of Ohio is within the range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species, the northern long-eared bat (*Myotis septentrionalis*), a state endangered and federally threatened species, the little brown bat (*Myotis lucifugus*), a state endangered species, and the tricolored bat (*Perimyotis subflavus*), a state endangered species. During the spring and summer (April 1 through September 30), these bat species predominately roost in trees behind loose, exfoliating bark, in crevices and cavities, or in the leaves. However, these species are also dependent on the forest structure surrounding roost trees. The DOW recommends tree cutting only occur from October 1 through March 31, conserving trees with loose, shaggy bark and/or crevices, holes, or cavities, as well as trees with DBH  $\geq 20$  if possible.

The DOW also recommends that a desktop habitat assessment is conducted, followed by a field assessment if needed, to determine if a potential hibernaculum is present within the project area. Direction on how to conduct habitat assessments can be found in the current USFWS “Range-wide Indiana Bat Survey Guidelines.” If a habitat assessment finds that a potential hibernaculum is present within 0.25 miles of the project area, please send this information to Erin Hazelton for project recommendations. If a potential or known hibernaculum is found, the DOW recommends a 0.25-mile tree cutting and subsurface disturbance buffer around the hibernaculum entrance, however, limited summer or winter tree cutting may be acceptable after consultation with the DOW. If no tree cutting or subsurface impacts to a hibernaculum are proposed, this project is not likely to impact these species.

The project is within the range of the following listed mussel species.

Federally Endangered

purple cat's paw (*Epioblasma o. obliquata*)  
clubshell (*Pleurobema clava*)  
northern riffleshell (*Epioblasma torulosa rangiana*)  
rayed bean (*Villosa fabalis*)  
snuffbox (*Epioblasma triquetra*)

Federally Threatened

rabbitsfoot (*Quadrula cylindrica cylindrica*)

State Endangered

elephant-ear (*Elliptio crassidens crassidens*)  
Long solid (*Fusconaia maculata maculate*)  
Ohio pigtoe (*Pleurobema cordatum*)  
pocketbook (*Lampsilis ovata*)  
washboard (*Megalonaias nervosa*)

State Threatened

black sandshell (*Ligumia recta*)  
fawnsfoot (*Truncilla donaciformis*)  
pondhorn (*Unio merus tetralasmus*)  
threehorn wartyback (*Obliquaria reflexa*)

Due to the location, and that there is no in-water work proposed in a perennial stream, this project is not likely to impact these species.

The project is within the range of the following listed fish species.

Federally Endangered

Scioto madtom (*Noturus trautmani*)

State Endangered

goldeye (*Hiodon alosoides*)

Iowa darter (*Etheostoma exile*)

popeye shiner (*Notropis ariommus*)

northern brook lamprey (*Ichthyomyzon fossor*)

spotted darter (*Etheostoma maculatum*)

shortnose gar (*Lepisosteus platostomus*)

tonguetied minnow (*Exoglossum laurae*)

State Threatened

lake chubsucker (*Erimyzon sucetta*)

paddlefish (*Polyodon spathula*)

Tippecanoe darter (*Etheostoma tippecanoe*)

Due to the location, and that there is no in-water work proposed in a perennial stream, this project is not likely to impact these species.

The project is within the range of the American bittern (*Botaurus lentiginosus*), a state endangered bird. Nesting bitterns prefer large undisturbed wetlands that have scattered small pools amongst dense vegetation. They occasionally occupy bogs, large wet meadows, and dense shrubby swamps. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 1 through July 31. If this type of habitat will not be impacted, the project is not likely to impact this species.

The project is within the range of the black-crowned night-heron (*Nycticorax nycticorax*), a state-threatened bird. Night-herons are so named because they are nocturnal, conducting most of their foraging in the evening hours or at night, and roost in trees near wetlands and waterbodies during the day. Night herons are migratory and are typically found in Ohio from April 1 through December 1 but can be found in more urbanized areas with reliable food sources year-round. Black-crowned night-herons primarily forage in wetlands and other shallow aquatic habitats, and roost in trees nearby. These night-herons nest in small trees, saplings, shrubs, or sometimes on the ground, near bodies of water and wetlands. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 1 through July 31. If this type of habitat will not be impacted, this project is not likely to impact this species.

The project is within the range of the cattle egret (*Bubulcus ibis*), a state endangered bird. Cattle egrets are not strictly wetland birds. They often forage in dry pastures and fields. Egrets nest in colonies and will build a nest out of sticks and other materials wherever it can be supported. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 15 through August 15. If no wetland habitat will be impacted, the project is not likely to impact this species.

The project is within the range of the lark sparrow (*Chondestes grammacus*), a state endangered bird. This sparrow nests in grassland habitats with scattered shrub layers, disturbed open areas, as well as patches of bare soil. These summer residents normally migrate out of Ohio shortly after their young fledge or leave the nest. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 1 through July 31. If this habitat will not be impacted, this project is not likely to impact this species.

The project is within the range of the least bittern (*Ixobrychus exilis*), a state threatened bird. This secretive marsh species prefers dense emergent wetlands with thick stands of cattails, sedges, sawgrass or other semiaquatic vegetation interspersed with woody vegetation and open water. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 1 through July 31. If this type of habitat will not be impacted, this project is not likely to impact this species.

The project is within the range of the northern harrier (*Circus hudsonis*), a state endangered bird. This is a common migrant and winter species. Nesters are much rarer, although they occasionally breed in large marshes and grasslands. Harriers often nest in loose colonies. The female builds a nest out of sticks on the ground, often on top of a mound. Harriers hunt over grasslands. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 15 through July 31. If this habitat will not be impacted, this project is not likely to impact this species.

The project is within the range of the sandhill crane (*Grus canadensis*), a state threatened species. Sandhill cranes are primarily a wetland-dependent species. On their wintering grounds, they will utilize agricultural fields; however, they roost in shallow, standing water or moist bottomlands. On breeding grounds they require a rather large tract of wet meadow, shallow marsh, or bog for nesting. If grassland, prairie, or wetland habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 1 through August 31. If this habitat will not be impacted, this project is not likely to have an impact on this species.

The project is within the range of the upland sandpiper (*Bartramia longicauda*), a state endangered bird. Nesting upland sandpipers utilize dry grasslands including native grasslands, seeded grasslands, grazed and ungrazed pasture, hayfields, and grasslands established through the Conservation Reserve Program (CRP). If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 15 through July 31. If this type of habitat will not be impacted, this project is not likely to impact this species.

Due to the potential of impacts to federally listed species, as well as to state listed species, we recommend that this project be coordinated with the US Fish & Wildlife Service.

**Water Resources:** The Division of Water Resources has the following comment.

The local floodplain administrator should be contacted concerning the possible need for any floodplain permits or approvals for this project. Your local floodplain administrator contact information can be found at the website below.

[http://water.ohiodnr.gov/portals/soilwater/pdf/floodplain/Floodplain%20Manager%20Community%20Contact%20List\\_8\\_16.pdf](http://water.ohiodnr.gov/portals/soilwater/pdf/floodplain/Floodplain%20Manager%20Community%20Contact%20List_8_16.pdf)

ODNR appreciates the opportunity to provide these comments. Please contact Mike Pettegrew at [mike.pettegrew@dnr.ohio.gov](mailto:mike.pettegrew@dnr.ohio.gov) if you have questions about these comments or need additional information.

Mike Pettegrew  
Environmental Services Administrator (Acting)

## Renner, Philip

---

**From:** Ohio, FW3 <ohio@fws.gov>  
**Sent:** Monday, July 19, 2021 3:36 PM  
**To:** Renner, Philip  
**Cc:** nathan.reardon@dnr.state.oh.us; Parsons, Kate; Thomayer, Matthew; ajtoohey@aep.com  
**Subject:** AEP's Cyprus-Customer 138 kV Transmission Line Project, Franklin County, Ohio

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged



UNITED STATES DEPARTMENT OF THE INTERIOR  
U.S. Fish and Wildlife Service  
Ecological Services Office  
4625 Morse Road, Suite 104  
Columbus, Ohio 43230  
(614) 416-8993 / Fax (614) 416-8994



TAILS# 03E15000-2021-TA-1709

Dear Mr. Renner,

The U.S Fish and Wildlife Service (Service) has received your recent correspondence requesting information about the subject proposal. We offer the following comments and recommendations to assist you in minimizing and avoiding adverse impacts to threatened and endangered species pursuant to the Endangered Species Act of 1973 (16 U.S.C. 1531 et seq), as amended (ESA).

Federally Threatened and Endangered Species: The endangered Indiana bat (*Myotis sodalis*) and threatened northern long-eared bat (*Myotis septentrionalis*) occur throughout the State of Ohio. The Indiana bat and northern long-eared bat may be found wherever suitable habitat occurs unless a presence/absence survey has been performed to document absence. Suitable summer habitat for Indiana bats and northern long-eared bats consists of a wide variety of forested/wooded habitats where they roost, forage, and breed that may also include adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, woodlots, fallow fields, and pastures. Roost trees for both species include live and standing dead trees  $\geq 3$  inches diameter at breast height (dbh) that have any exfoliating bark, cracks, crevices, hollows and/or cavities. These roost trees may be located in forested habitats as well as linear features such as fencerows, riparian forests, and other wooded corridors. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet of other forested/wooded habitat. Northern long-eared bats have also been observed roosting in human-made structures, such as buildings, barns, bridges, and bat houses; therefore, these structures should also be considered potential summer habitat. In the winter, Indiana bats and northern long-eared bats hibernate in caves, rock crevices and abandoned mines.

Seasonal Tree Clearing for Federally Listed Bat Species: Should the proposed project site contain trees  $\geq 3$  inches dbh, we recommend avoiding tree removal wherever possible. If any caves or abandoned mines may be disturbed, further coordination with this office is requested to determine if fall or spring portal surveys are warranted. If no caves or abandoned mines are present and trees  $\geq 3$  inches dbh cannot be avoided, we recommend removal of any trees  $\geq 3$  inches dbh only occur between October 1 and March 31. Seasonal clearing is recommended to avoid adverse effects to Indiana bats and northern long-eared bats. While incidental take of northern long-eared bats from most tree clearing is exempted by a 4(d) rule

(see <http://www.fws.gov/midwest/endangered/mammals/nleb/index.html>), incidental take of Indiana bats is still prohibited without a project-specific exemption. Thus, seasonal clearing is recommended where Indiana bats are assumed present.

If implementation of this seasonal tree cutting recommendation is not possible, a summer presence/absence survey may be conducted for Indiana bats. If Indiana bats are not detected during the survey, then tree clearing may occur at any time of the year. Surveys must be conducted by an approved surveyor and be designed and conducted in coordination with the Ohio Field Office. Surveyors must have a valid federal permit. Please note that in Ohio summer mist net surveys may only be conducted between June 1 and August 15.

Section 7 Coordination: If there is a federal nexus for the project (e.g., federal funding provided, federal permits required to construct), then no tree clearing should occur on any portion of the project area until consultation under section 7 of the ESA, between the Service and the federal action agency, is completed. We recommend the federal action agency submit a determination of effects to this office, relative to the Indiana bat and northern long-eared bat, for our review and concurrence. This letter provides technical assistance only and does not serve as a completed section 7 consultation document.

Stream and Wetland Avoidance: Over 90% of the wetlands in Ohio have been drained, filled, or modified by human activities, thus it is important to conserve the functions and values of the remaining wetlands in Ohio ([https://epa.ohio.gov/portals/47/facts/ohio\\_wetlands.pdf](https://epa.ohio.gov/portals/47/facts/ohio_wetlands.pdf)). We recommend avoiding and minimizing project impacts to all wetland habitats (e.g., forests, streams, vernal pools) to the maximum extent possible in order to benefit water quality and fish and wildlife habitat. Additionally, natural buffers around streams and wetlands should be preserved to enhance beneficial functions. If streams or wetlands will be impacted, the U.S. Army Corps of Engineers should be contacted to determine whether a Clean Water Act section 404 permit is required. Best management practices should be used to minimize erosion, especially on slopes. Disturbed areas should be mulched and revegetated with native plant species. In addition, prevention of non-native, invasive plant establishment is critical in maintaining high quality habitats.

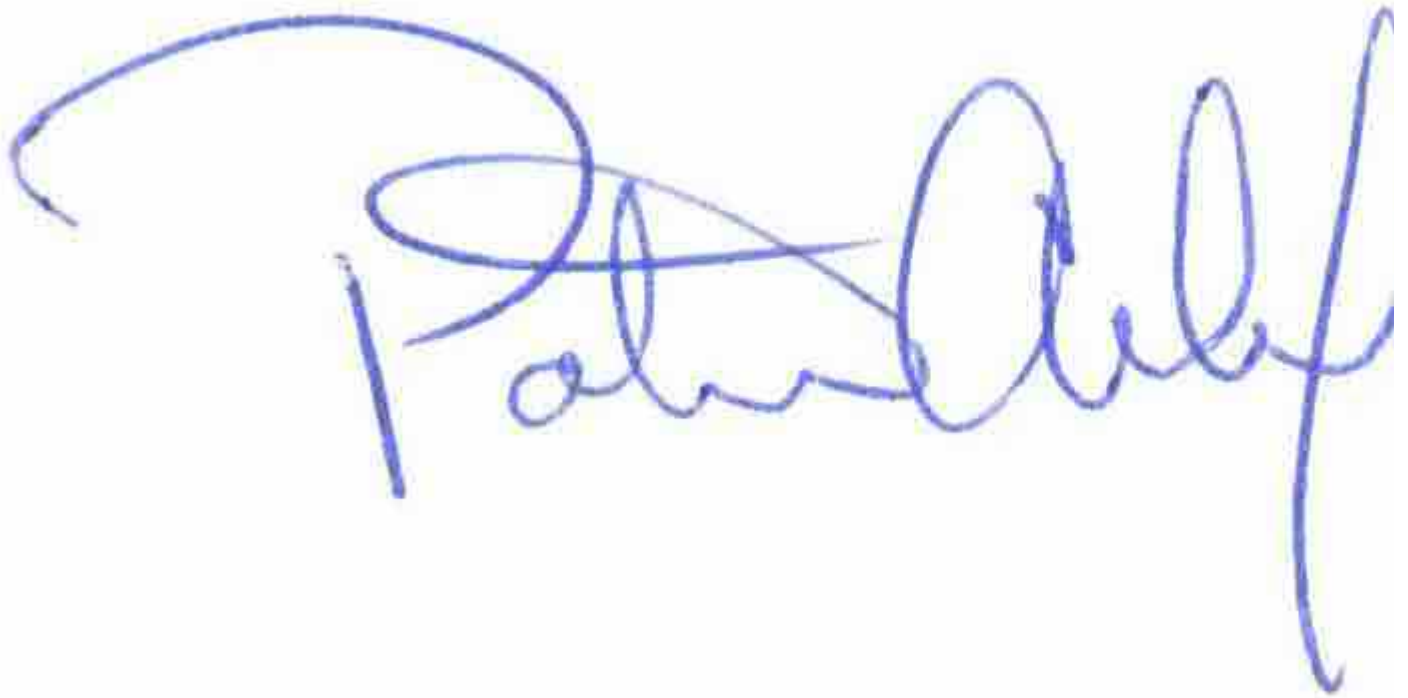
Due to the project type, size, and location, we do not anticipate adverse effects to any other federally endangered, threatened, or proposed species, or proposed or designated critical habitat. Should the project design change, or additional information on listed or proposed species or their critical habitat become available, or if new information reveals effects of the action that were not previously considered, coordination with the Service should be initiated to assess any potential impacts.

Thank you for your efforts to conserve listed species and sensitive habitats in Ohio. We recommend coordinating with the Ohio Department of Natural Resources due to the potential for the proposed project to affect state listed species and/or state lands. Contact Mike Pettegrew, Acting Environmental Services Administrator, at (614) 265-6387 or at [mike.pettegrew@dnr.state.oh.us](mailto:mike.pettegrew@dnr.state.oh.us).

If you have questions, or if we can be of further assistance in this matter, please contact our office at (614) 416-8993 or [ohio@fws.gov](mailto:ohio@fws.gov).

Sincerely,



A handwritten signature in blue ink, appearing to read "Patrice M. Ashfield". The signature is fluid and cursive, with a large initial "P" and a long, sweeping underline.

Patrice M. Ashfield  
Field Office Supervisor

cc: Nathan Reardon, ODNR-DOW  
Kate Parsons, ODNR-DOW

**This foregoing document was electronically filed with the Public Utilities  
Commission of Ohio Docketing Information System on**

**11/18/2021 9:13:16 AM**

**in**

**Case No(s). 21-1057-EL-BNR**

Summary: Notice Supplemental Info Filing electronically filed by Hector Garcia-Santana on behalf of Ohio Power Company