

BEFORE THE POWER SITING BOARD OF THE STATE OF OHIO

In the Matter of the Letter of Notification Application)
of AEP Ohio Transmission Company, Inc. for the West) **Case No. 21-0892-EL-BLN**
Moulton 138 kV Station Expansion 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 (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 December 2, 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 objections you or your designee may have with this case to my office at least four business days prior to December 2, 2021, which is the recommended automatic approval date.

Sincerely,



Theresa White
Executive Director
Ohio Power Siting Board

OPSB STAFF REPORT OF INVESTIGATION

Case Number: 21-0892-EL-BLN
Project Name: West Moulton 138 kV Station Expansion Project
Project Location: Auglaize County
Applicant: AEP Ohio Transmission Company, Inc.
Application Filing Date: September 2, 2021
Filing Type: Letter of Notification
Inspection Date: November 2, 2021
Report Date: November 24, 2021
Recommended Automatic Approval Date: December 2, 2021
Applicant's Waiver Requests: None
Staff Assigned: A. Holderbaum, T. Crawford, A. Conway

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. (Applicant) proposes the expansion of the West Moulton 138 kilovolt (kV) Station which would accommodate the new 138 kV transmission line previously approved by the Ohio Power Siting Board (OPSB) in Case No. 21-0167-EL-BLN.¹ It would also accommodate the Dayton Power and Light Company's d/b/a AES Ohio request to interconnect a new 138 kV transmission line from its Amsterdam station to the West Moulton Station. The project would expand the existing West Moulton Station by 2.2 acres on property owned by the Ohio Power Company. This project would change the West Moulton Station's existing four-breaker ring bus to a six-breaker ring bus configuration.

The project is needed to meet the request of AES Ohio and improve operational flexibility to withstand and minimize outages in the northern portion of the AES Ohio service area and to minimize or reduce thermal issues with the transmission lines.

1. Within the Staff Report of Investigation filed in case number 21-0167-EL-BLN, Staff stated in pertinent part:

The project is needed to serve load in the City of Wapakoneta, which is expected to be approximately 127 megawatt (MW), including 40 MW of new load from new customers coming online in the same area over the next few years. This project will also provide needed capacity in the area to other customers, such as the City of Saint Marys, served by the West Moulton Substation.

Upgrades to the transmission system are part of the PJM Regional Transmission Planning (RTEP) process.² AES Ohio submitted the statement of need to the PJM Subregional RTEP Committee – Western on March 19, 2020 and submitted the solution on October 16, 2020. The project was assigned the supplemental ID number s2398.³ Supplemental projects or upgrades refer to transmission expansion or enhancements not needed to comply with PJM reliability, operational performance, FERC Form No. 715, economic criteria or State Agreement Approach projects.⁴ The project was included in the Applicant’s 2021 Long–Term Forecast Report, PUCO Form FE-T10, page 92, which may be accessed through the Public Utilities Commission of Ohio Docketing Information System website and entering 20-0501 in the ‘Case Lookup.’⁵

The Applicant proposes to begin construction in February 2022 with an in-service date of December 2022. The estimated capital cost for the project is \$6,000,000.⁶

Nature of Impacts

Land Use

The project would be located in St. Mary’s Township, Auglaize County. The footprint of the project would be on agricultural land owned by the Applicant. The project area consists of agricultural, wood lots, and scattered residential land uses. No residences are within 1,000 feet of the project. The Applicant states less than one acre of tree clearing is anticipated for this project. No institutional land uses, such as government buildings, schools, churches, or cemeteries were identified within 1,000 feet of the project.

While the project would be located on approximately 1.4 acres of land historically used for agricultural land, there are no Agricultural District Land parcels within the footprint of the project.

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 project area and vicinity were surveyed in January 2020 and, as a result of those surveys, the consultant determined that the project would not involve or impact any significant cultural resources or landmarks, and that no further cultural resource management work was considered to be 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

2. 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.

3. <https://www.pjm.com/-/media/committees-groups/committees/srrtep-w/postings/dayton-local-plan-submission-of-the-supplemental-projects-for-2021-rtep.ashx> (Accessed November 2, 2021.).

4. PJM Manual 14B: PJM Region Transmission Planning Process, Revision 50, Effective Date: July 1, 2021.

5. <https://dis.puc.state.oh.us/> (Accessed November 2, 2021.).

6. Applicant indicates that the projected costs, approximately \$6,000,000 composed of applicable tangible and capital costs were obtained using a Class 4 estimate. The costs will be recovered in the Applicant’s FERC Formula Rate (i.e. the annual transmission revenue applicable under PJM Open Access Transmission Tariff, Attachment H-20), and would be assessed on all users of the AEP Zone, as the project is a through path facility benefiting all ratepayers.

properties, and that no additional cultural resources studies are needed. Staff agrees with these findings.

Surface Waters

Wetland and stream delineation field surveys were completed within the project area by the Applicant's consultant in April 2021. Three Category 1 wetlands and one intermittent stream were identified within the project area.⁷ The Applicant states 0.54 acres of permanent impacts and 0.17 acres of temporary impacts to wetlands would be required to construct the project. No impacts to the intermittent stream would occur.

The Applicant reviewed the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map to identify any floodplain/flood hazard areas that have been mapped within the project area (map 39045C0230G). No mapped FEMA floodplains are located in the project area. Therefore, the Applicant will not be pursuing a floodplain permit for this project.

The Applicant would file a Notice of Intent with the Ohio Environmental Protection Agency for authorization of construction stormwater impacts under the National Pollutant Discharge Elimination System General Permit prior to the beginning of construction. The Applicant would implement and maintain best management practices as outlined in the project-specific Storm Water Pollution Prevention Plan to minimize erosion, control sediment, and protect surface water quality during storm events.

Threatened and Endangered Species

The Applicant states tree clearing would be required for this project. The project area is within the range of the state and federal endangered Indiana bat (*Myotis sodalis*), and state endangered and federal threatened northern long-eared bat (*Myotis septentrionalis*). The Ohio Department of Natural Resources (ODNR) Division of Wildlife (DOW) states the project area east of Dixie Highway and south of Weimert School Road is within the vicinity of records for the Indiana bat. Presence of the Indiana bat has been established in the area, and therefore additional summer surveys would not constitute presence/absence in the area. As tree roosting species in the summer months, the habitat of these species would be impacted by the project. In order to avoid impacts to these listed bat species, the ODNR and the U.S. Fish and Wildlife Service (USFWS) recommend seasonal tree cutting dates of October 1 through March 31 for all trees that are three inches or greater in diameter. The proposed project is not expected to impact any bat hibernacula.

The project area is within the range of the state endangered lark sparrow (*Chondestes grammacus*). This species 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. The ODNR DOW recommends construction be avoided in this habitat during the species' nesting period of May 1 to June 30.

The ODNR DOW has a record for a great blue heron rookery near the project area. The rookery is located within the large woodlot between the following roads: Washington Pike, Burr Oak Road, Kettlersville Road, and Kohler Road. The location of the rookery is approximately 4.8 miles away from the project and thus, no impacts to the rookery would occur.

7. 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.

The project is within the range of several state and federal listed mussel and fish species. Due to no in water work being proposed for this project, the location of the project, and the type of work proposed, impacts to these species are not anticipated.

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 December 2, 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.
- (3) The Applicant shall adhere to seasonal cutting dates of October 1 through March 31 for removal of any trees greater than or equal to three inches in diameter unless coordination efforts with the ODNR and the USFWS allows a different course of action. If coordination with these agencies allows clearing between April 1 and September 30, the Applicant shall docket proof of completed coordination on the case docket prior to clearing trees.
- (4) Construction in lark sparrow preferred nesting habitat types shall be avoided during the species' nesting period of May 1 through June 30, unless coordination with the Ohio Department of Natural Resources allows a different course of action. If coordination with the Ohio Department of Natural Resources allows clearing between May 1 and June 30, the Applicant shall docket proof of completed coordination on the case docket prior to clearing trees. If present, mapping of these habitat areas shall be provided to the construction contractor along with instructions to avoid these areas during the restricted dates.

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

11/24/2021 4:00:30 PM

in

Case No(s). 21-0892-EL-BLN

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