

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Ohio Power Siting)	
Board's Review of Ohio Adm.Code Chapters)	Case No. 21-902-GE-BRO
4906-1, 4906-2, 4906-3, 4906-4, 4906-5,)	
4906-6, and 4906-7.)	

**PETITION TO INTERVENE
AND
COMMENTS
OF
THE OHIO MANUFACTURERS' ASSOCIATION ENERGY GROUP**

Pursuant to R.C. 4906.12, R.C. 4903.221, and Ohio Adm. Code 4901-1-11, the Ohio Manufacturers' Association Energy Group (OMAEG) respectfully moves the Ohio Power Siting Board (Board) to intervene in this matter with the full powers and rights granted to intervening parties. As demonstrated in the attached Memorandum in Support, OMAEG has a real and substantial interest in this proceeding that may be adversely affected by the outcome herein, and which cannot be adequately represented by any other party. Accordingly, OMAEG satisfies the standard for intervention set forth in Ohio statutes and regulations. Additionally, OMAEG submits the attached comments for the Board's consideration.

Therefore, OMAEG respectfully requests that the Board grant its petition to intervene for the reasons stated herein and as more fully set forth in the attached Memorandum in Support. OMAEG also requests that it be made a full party of record in these proceedings.

Respectfully submitted,

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**MEMORANDUM IN SUPPORT
AND
COMMENTS**

I. INTRODUCTION

Pursuant to R.C. 111.15(B) and 106.03(A), the Board is required to conduct a review of the Ohio Administrative Code every five years. On June 16, 2022, the Board invited interested persons or entities to file comments on proposed amendments to Ohio Adm.Code Chapters 4906-1 through 4906-7 by July 22, 2022. The Board's July 14, 2022 Entry extended the deadline for filing initial comments to August 5, 2022.

Ohio Adm.Code Chapters 4906-1 through 4906-7 contain rules that specify the requirements for applications to site and construct new, improved, and adjusted electric power transmission lines and substations, including the form and content of the applications. Pursuant to the Board's directive, OMAEG hereby submits the following comments and amendments to Ohio Adm.Code Chapters 4906-1 through 4906-7 and Staff's proposed amendments thereto to promote cost-effective, transparent, and sensible investments in the transmission system that are paid for by customers. The additional data requested will also ensure that any proposed transmission investments will produce reliability benefits to the system.

It is important to note that over the past three years, the Board has authorized \$1.4 billion in transmission system spending through an accelerated review process that does not require documented reliability benefits to Ohio customers. \$1.1 billion of this transmission spending was not part of PJM's Regional Transmission Expansion Planning (RTEP), and thus also was not required to demonstrate reliability benefits to PJM or the Federal Energy Regulatory Commission (FERC). Meanwhile, Ohio's transmission system has recently suffered spectacular reliability failures and deficiencies. OMAEG's proposed amendments to the proposed rules in Chapters 4906-1 through 4906-7, as set forth in Attachment A attached hereto, will help alleviate these failures and deficiencies.

II. INTERVENTION

Pursuant to R.C. 4906.12, the intervention standard set forth in R.C. 4903.221 applies to any Board proceeding or order. R.C. 4903.221 and Ohio Adm. Code 4901-1-11 establish the standard for intervention in the above-captioned proceedings.¹ Read in conjunction with R.C. 4906.12, R.C. 4903.221 provides, in part, that any person "who may be adversely affected" by a Board proceeding is entitled to seek intervention in that proceeding. R.C. 4903.221(B) further requires the Board to consider the nature and extent of the prospective intervenor's interest, the legal position advanced by the prospective intervenor and its probable relation to the merits of the case, whether the intervention by the prospective intervenor will unduly prolong or delay the proceeding, and the prospective intervenor's potential contribution to a just and expeditious resolution of the issues involved.

¹ See Entry at ¶ 7 (July 14, 2022) ("Upon review of the intervention filings of OEG and OCC, the ALJ finds that both OEG and OCC meet the intervention criteria set forth in R.C. 4903.221 and Ohio Adm.Code 4901-1-11.").

OMAEG is a non-profit entity that strives to improve business conditions in Ohio and drive down the cost of doing business for Ohio manufacturers. OMAEG members and their representatives work directly with elected officials, regulatory agencies, the judiciary, and the media to provide education and information to energy consumers, regulatory boards and suppliers of energy; advance energy policies to promote an adequate, reliable, and efficient supply of energy at reasonable prices; and advocate in critical cases before the Public Utilities Commission of Ohio (Commission) and Board. As consumers of significant amounts of energy in Ohio, OMAEG has been involved in numerous rulemaking cases before the Commission and the Board.² OMAEG has also participated in previous proceedings before the Board or other regulatory agencies regarding Ohio's transmission system and related issues.³

For these reasons, OMAEG has a direct, real, and substantial interest in the issues raised in this proceeding and is so situated that the disposition of this proceeding may, as a practical matter, impair or impede its ability to protect that interest. OMAEG regularly and actively participates in Commission and Board proceedings and, as in previous proceedings, OMAEG's unique knowledge and manufacturer perspective will contribute to the full development and equitable resolution of the factual issues in this case. OMAEG's interest will not be adequately

² See, e.g., *In the Matter of the Commission's Review of the Rules in Ohio Adm. Code Chapter 4901:1-9*, Case No. 20-1800-EL-ORD, Reply Comments of The Ohio Manufacturers' Association Energy Group (Mar. 29, 2021); *In the Matter of the Commission's Review of Chapter 4901:1-22 of the Ohio Administrative Code Regarding Interconnection Services*, Case No. 18-884-EL-ORD, Comments of The Ohio Manufacturers' Association Energy Group (Mar. 13, 2020); *In the Matter of the Commission's Review of the Rules in Ohio Adm. Code Chapter 4901:1-38*, Case No. 18-1191-EL-ORD, Comments of The Ohio Manufacturers' Association Energy Group (May 3, 2019).

³ See, e.g., *In the Matter of the Ohio Power Siting Board's Report to the General Assembly Regarding the Power Transmission System*, Case No. 21-796-EL-UNC, Comments of The Ohio Manufacturers' Association Energy Group (Aug. 4, 2021); *In the Matter of the Review of the Non-Market-Based Services Rider Contained in the Tariffs of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company*, Case No. 18-1818-EL-RDR, Comments of The Ohio Manufacturers' Association Energy Group (Mar. 29, 2019); and *In re Grid Reliability and Resiliency Pricing*, FERC Docket No. RM12-1-000, Comments of The Ohio Manufacturers' Association Energy Group (Oct. 23, 2017).

represented by other parties and its timely intervention will not unduly delay or prolong these proceedings.

III. COMMENTS

A. The Board’s current accelerated application process results in the investment of billions of customer dollars in the electric power transmission system with no documented reliability benefits.

From May 2019 to July 2022, Ohio’s four electric distribution utilities—AEP Ohio, FirstEnergy, AES Ohio, and Duke Energy Ohio—proposed to spend over \$1.4 billion on transmission projects that qualified for the Board’s accelerated review process. At least 61 of the 102 projects presented for accelerated review, which account for \$1.09 billion in proposed spending, received a “supplemental” designation from Ohio’s regional transmission organization, PJM Interconnection LLC (PJM).⁴ Supplemental projects are not required for compliance with system reliability, operational performance, or market efficiency criteria, and are not subject to PJM’s approval. PJM’s responsibility to or for supplemental projects is limited to “do-no-harm” analyses.⁵ Analyses of “baseline” projects, on the other hand, are conducted against the North American Electric Reliability Corporation’s (NERC) Reliability Planning Standard TPL-001-4 and are the core of PJM’s Regional Transmission Expansion Plan (RTEP), a comprehensive forward-looking analysis of the transmission system performed each year.⁶ The RTEP, as described by PJM, “identifies transmission system additions and improvements needed to keep electricity flowing to 51 million people throughout 13 states and the District of Columbia. Studies are conducted that test the transmission system against mandatory national

⁴ See various Letters of Notification recorded in the Board’s Docketing Information System. See cases with Industry Code “EL” (electric), Purpose Code “BLN” (letter of notification), and Status “OPEN.”

⁵ *2021 Regional Transmission Expansion Plan*, PJM at 60, available at <https://www.pjm.com/-/media/library/reports-notices/2021-rtep/2021-rtep-report.ashx> (March 7, 2022).

⁶ *Id.* at 13-17.

standards and PJM regional standards. These studies look 15 years into the future to identify transmission overloads, voltage limitations and other reliability standards violations.”⁷

Concern for the cost and benefits of supplemental transmission projects is well documented by the Commission. In a recent Federal Energy Regulatory Commission (FERC) proceeding, the Commission’s Federal Energy Advocate called investment in supplemental transmission projects “unfettered,”⁸ explaining that:

In Ohio, \$355 million was spent on baseline and supplemental transmission projects in 2010. In 2018 and 2019 in Ohio, the level of transmission investment ballooned to \$2.4 billion and \$1.9 billion, respectively. This trend is not abating even with the health emergency of last year. Ohio’s 2020 transmission project investment totaled approximately \$1.12 billion. Approximately 97.6 percent of that represents supplemental projects.⁹

In a separate FERC proceeding, the Commission’s Federal Energy Advocate argued that increased regulatory oversight for supplemental projects would be the single most important reform to foster cost-effectiveness in transmission planning.¹⁰ The Board’s accelerated review process, which handled twenty-two supplemental transmission proposals in 2021,¹¹ could be used to extend needed regulatory oversight to projects pushed to the margin of PJM’s RTEP.

Unfortunately, the loose form and content requirements of the accelerated certificate application—set forth in Ohio Adm.Code 4906-6-05—limit the scope and specificity of the Board’s accelerated review process. As written, current Ohio Adm.Code 4906-6-05 requires

⁷ *Regulators—Regional Transmission Expansion Plan*, PJM, available at <https://www.pjm.com/planning/rtep-development/stakeholder-process/regulators> (accessed July 19, 2022).

⁸ *Electric Transmission Incentives Policy Under Section 219 of the Federal Power Act*, FERC Docket No. RM20-10-000, Comments of the Pub. Util. Comm’n of Ohio at 3 (June 25, 2021).

⁹ *Id.* at 6.

¹⁰ *Building for the Future Through Electric Regional Transmission Planning and Cost Allocation and Generator Interconnection*, FERC Docket No. RM21-17-000, Comments of the Pub. Util. Comm’n of Ohio at 10-11 (Oct. 12, 2021).

¹¹ See various Letters of Notification recorded in the Board’s Docketing Information System. See cases with Industry Code “EL” (electric), Purpose Code “BLN” (letter of notification), and Status “OPEN.”

applicants to “provide a statement explaining the need for the proposed facility,” but fails to identify the descriptions and metrics most relevant to Board members.¹² A recent Board case, Case No. 21-268-EL-BLN,¹³ demonstrates the troubling effects of this vague requirement and directive.

Opened in May 2021 by AEP Ohio, Case No. 21-268-BLN contains a proposal to rebuild approximately fifty-two miles of 138 kV transmission line at a cost of approximately \$153 million to AEP Ohio customers. The application’s statement of need conveys the following information:

Fifty percent of the structures are original vintage from 1943 and the remaining structures were replaced between 1960 - 1980. The majority (93%) of the original conductor built in 1944 and 1948 is still in service. This line has significant asset renewal concerns, which includes 1342 open conditions on the line. These conditions include numerous pole, shielding, and grounding issues throughout the line. South Central Power’s Sinking Springs delivery point is served from this line and has experienced over 3.5 million Customer Minutes of Interruption over the past five years. Sinking Springs serves approximately 1,500 customers with 4.6 MVA of peak load... Without the Project, customer minutes of interruptions will continue to get worse as the line asset deteriorates.¹⁴

AEP Ohio’s statement of need illustrates four troubling effects of the current Ohio Adm.Code 4906-6-05, which Staff has not proposed to substantially amend in this rulemaking. First, AEP Ohio’s overly broad statement of need declares “significant asset renewal concerns,” but avoids reporting the severity of specific instances of damage and deterioration and why the need exists.¹⁵ The application is also lacking estimates of the cost to repair the kinds of open

¹² Ohio Adm.Code 4906-6-05(B)(2).

¹³ *In the Matter of the Construction Notice Application of AEP Ohio Transmission Company, Inc. for a Certificate of Environmental Compatibility and Public Need for the Hillsboro-Millbrook Park 138 kV Line Rebuild Project*, Case No. 21-268-EL-BGN.

¹⁴ *Id.*, Letter of Notification at 2 (May 11, 2021).

¹⁵ *Id.*

conditions¹⁶ described by AEP Ohio.¹⁷ As a result, the Board application declares that the total rebuild proposed is urgent, appropriate, and cost-effective without hard evidence equipped to support such claims.

Second, the statement declares 3.5 million “Customer Minutes of Interruption” but avoids citing to or detailing the causes of specific interruptions logged.¹⁸ In fact, Customer Minutes of Interruption can be attributable to a range of factors including unruly vegetation, equipment mis-operation, and delayed maintenance.¹⁹ The condition of any transmission system facilities is just one of many possible explanations for the interruptions reported above. As written, AEP Ohio’s statement of need provides insufficient evidence to determine that the total rebuild proposed will solve a single minute of customer interruption.

Third, the decision to report Customer Minutes of Interruption over other reliability indices—such as System Average Interruption Frequency Index (SAIFI), System Average Interruption Duration Index (SAIDI), and Customer Average Interruption Duration Index (CAIDI)—deviates from generally accepted practices published by the Institute of Electrical and Electronic Engineers (IEEE).²⁰ Once more, evidence furnished in the accelerated review process arrives without detail, without context, without clarity, and in the AEP Ohio case cited herein, without regard for industry precedent.

¹⁶ An “open condition” means an instance of damage and or deterioration to a major utility facility or component thereof. The Board should amend proposed Rule 4901-1-01 to include this definition in order to provide more clarity in the rules.

¹⁷ *In the Matter of the Construction Notice Application of AEP Ohio Transmission Company, Inc. for a Certificate of Environmental Compatibility and Public Need for the Hillsboro-Millbrook Park 138 kV Line Rebuild Project*, Case No. 21-268-EL-BGN, Letter of Notification at 2 (May 11, 2021).

¹⁸ *In the Matter of the Construction Notice Application of AEP Ohio Transmission Company, Inc. for a Certificate of Environmental Compatibility and Public Need for the Hillsboro-Millbrook Park 138 kV Line Rebuild Project*, Case No. 21-268-EL-BGN, Letter of Notification at 2 (May 11, 2021) .

¹⁹ *Id.*

²⁰ *IEEE Draft Guide for Electric Power Distribution Reliability Indices*, IEEE P1366/D6, at 1-43 (May 2022).

Finally, AEP Ohio's application requests to replace ninety transmission line structures and fifty-two miles of transmission lines, but omits a description of the operational improvements expected to result from these efforts.²¹ Will new structures increase the line's resistivity to high winds? Will new conductors raise the thermal limit of the line? Are these upgrades needed? Unfortunately, AEP Ohio's statement of need leaves these important questions unanswered.

The theme of this example specifically, and of the accelerated certificate application generally, is that current Ohio Adm.Code 4906-6-05 fails to require descriptions and metrics that are essential to evaluate the cost and benefits of an investment in the transmission system, including the usefulness of alternative solutions and the need for reliability improvements. In this way, the exiting language of Ohio Adm.Code 4906-6-05 stands in direct conflict with R.C. 4906.10, which states that the Board shall not grant an accelerated certificate application unless it determines "that the facility will serve the interests of electric system economy and reliability."²² It would be difficult for the Board to evaluate reliability if it does not require quantitative reliability criteria to be documented in accelerated certificate applications. This example also highlights the need to further define certain terminology utilized in accelerated applications and the industry, such as "grid-enhancing technology," "open condition," and "protection scheme, so that cost-effective alternative projects can be identified and evaluated."²³

²¹*In the Matter of the Construction Notice Application of AEP Ohio Transmission Company, Inc. for a Certificate of Environmental Compatibility and Public Need for the Hillsboro-Millbrook Park 138 kV Line Rebuild Project*, Case No. 21-268-EL-BGN, Letter of Notification at 2 (May 11, 2021) ("The Project involves rebuilding approximately 52 miles of 138 kV line between Ohio Power Company's Hillsboro and Millbrook Park stations, as a single circuit line. Currently, the Hillsboro-Millbrook Park 138 kV circuit is configured as two separate wood pole lines, six wired together. Fifty percent of the structures are original vintage from 1943 and the remaining structures were replaced between 1960- 1980. The majority (93%) of the original conductor built in 1944 and 1948 is still in service.").

²² R.C. 4906.10(A)(4).

²³ See Attachment A. OMAEG also corrected what appears to be an inadvertent strikeout in the definition of "maximum allowable operating pressure."

Accordingly, OMAEG respectfully requests that the Board amend proposed Rules 4901-1-01 and 4906-6-05 in accordance with the suggestions contained in Sections III.B, III.C, and III.D herein to promote the Board’s compliance with R.C. 4906.10 and to render the accelerated application review process a useful tool in promoting cost-effective and sensible investments in the transmission system that document actual reliability improvements and benefits.

B. Accelerated applications should describe problems with existing transmission facilities and include reliable data on the type and location of service interruptions and infrastructural deterioration.

A starting point for the much-needed reform of current Ohio Adm.Code 4906-6-05 and proposed Rule 4906-6-05 can be found earlier in the Ohio Administrative Code, in current Ohio Adm.Code 4906-2-04 and proposed Rule 4906-2-04. Titled “Form and general content requirements of certificate applications,” current Ohio Adm.Code 4906-2-04(C)(1) (which Staff has not proposed to amend) states:

The cost and benefits of the direct and indirect effects of siting decisions shall be expressed in monetary and quantitative terms whenever doing so is practicable. All responses shall be supported by:

- a) An indication of the source of data.
- b) The assumptions made.
- c) The methods of reaching the conclusion.
- d) The justification for selection of alternatives.²⁴

A corresponding requirement to current Ohio Adm.Code 4906-6-05 can fulfill the directives contained in Ohio Adm.Code 4906-2-04 while continuing to provide an accelerated pathway for qualifying projects. This potential is most prominent in applications to rebuild existing transmission facilities—a subset of project types that represents 63.2% of \$1.4 billion

²⁴ Ohio Adm.Code 4906-2-04(C)(1).

reviewed in the Board’s accelerated application process since May 2019, or \$885 million.²⁵ To support the need for proposals to rebuild transmission facilities, most applicants emphasized the age of existing facilities, the summed duration of total service interruptions through existing facilities, and the total number of open conditions on existing facilities. This information serves to outline potentially significant problems, but falls far short of the level of specificity that is intended and required by Ohio Adm.Code 4906-2-04 and that is practicable for Ohio’s four distribution utilities.

Accordingly, OMAEG recommends that the Board modify proposed Rule 4906-6-05 to require applicants to provide the following information in accelerated certificate applications:

- If the cost and benefits of the direct and indirect effects of siting decisions are expressed by the applicant in terms of the damage to and/or deterioration of existing facilities:
 - The applicant’s need statement shall declare the location of and type of each open condition, and
 - The applicant’s need statement shall declare the source of data and the methods used to characterize and identify each type of open condition.
- If the cost and benefits of the direct and indirect effects of siting decisions are expressed by the applicant in terms of the service interruptions through existing facilities:
 - The applicant’s need statement shall declare the location of, type of, and cause of each service interruption,
 - The applicant’s need statement shall declare the source of data and the methods used to characterize and identify each type of service interruption,
 - The applicant shall only document service interruptions caused by open conditions on the transmission system, and
 - Applicants shall follow IEEE’s Guide for Electric Power Distribution Reliability Indices when reporting service interruptions in the aggregate.

²⁵ See various Letters of Notification recorded in the Board’s Docketing Information System. See cases with Industry Code “EL” (electric), Purpose Code “BLN” (letter of notification), and Status “OPEN.”

Accordingly, OMAEG respectfully requests that the Board adopt amendments to proposed Rule 4906-6-05 as provided in Attachment A attached hereto.

C. Accelerated applications and associated need statements should demonstrate how and to what degree a proposed facility is expected to improve the transmission system, rather than emphasizing the problems of existing facilities.

The Board should require a well-documented demonstration of need for transmission system improvements. In a survey of accelerated certificate applications submitted since May 2019, twenty-two applicants proposed supplemental projects to rebuild electric power transmission lines at a total cost of \$718 million. None of these applicants reported if and how their projects would improve the performance and reliability of the transmission system.²⁶ Indeed, no such information is currently required by current Ohio Adm.Code 4906-6-05.

Current Ohio Adm.Code 4906-5-03 (which Staff has proposed to consolidate with proposed Rule 4906-4-03) describes the form and content requirements of the Board's standard certificate application. The current Ohio Adm.Code 4906-5-03 and the consolidated proposed Rule 4906-4-03, can serve as benchmarks for examining the deficiency in existing Ohio Adm.Code 4906-6-05 for accelerated applications. Through the standard certificate application review process, applicants are required to report a comprehensive set of project characteristics to support the need for their proposed facilities, including "load flow data in the form of a transcription diagram depicting system performance with and without the proposed facility."²⁷ Existing Ohio Adm.Code 4906-5-03 requires that "the applicant shall provide an analysis of the impact of the proposed facility on the electric power system economy and reliability. The impact of the proposed

²⁶ See various Letters of Notification recorded in the Board's Docketing Information System. See cases with Industry Code "EL" (electric), Purpose Code "BLN" (letter of notification), and Status "OPEN."

²⁷ Ohio Adm.Code 4906-5-03(A)(4).

facility on all interconnected utility systems shall be evaluated, and all conclusions shall be supported by relevant load flow studies.”²⁸

Importantly, the form and content requirements of the standard certificate application provide the Board with multiple opportunities to evaluate if and how a proposed facility is expected to improve the operation of the transmission system. By including this information, the standard certificate application equips the Board with the ability to determine that an improvement to the transmission system addresses the need declared.

All improvements to the transmission system should be disclosed pursuant to the Board’s responsibilities under R.C. 4906.10 to “*serve the interests of electric system economy and reliability*,”²⁹ including improvements proposed under the accelerated application process. The absence of a discussion of the expansion of operational capabilities and operational limits in accelerated certificate applications provides a path for unchecked spending on unnecessary upgrades. OMAEG recommends that the Board amend proposed Rule 4906-6-05 to require the following when proposing transmission system improvements through the accelerated process:

- Applicants that propose new or rebuilt transmission line structures shall declare the weight-bearing limit of existing structures and the weight-bearing limit of proposed structures. Justification for a change in the weight-bearing limit of a structure shall be contained in the statement of need and rely upon appropriate data.
- Applicants that propose new or rebuilt transmission line conductors shall declare the thermal limit of existing conductors and the thermal limit of proposed conductors. Justification for a change in the thermal limit of a conductor shall be contained in the statement of need and rely upon appropriate data.
- Applicants that propose new transmission line pathways—including line taps, line extensions, and proposals to add and remove circuits—shall declare changes to the performance and reliability of the transmission system. Justification for such changes shall be contained in the statement of need and rely upon appropriate data.

²⁸ Ohio Adm.Code 4906-5-03(C)

²⁹ R.C. 4906.10(A)(4) (emphasis added).

As such, OMAEG respectfully requests that the Board adopt amendments to proposed Rule 4906-6-05 as provided in Attachment A attached hereto.

D. Applicants filing under the accelerated review process should demonstrate how protective relays are configured in the presence of new, improved, and adjusted transmission facilities to minimize the extent of electrical instabilities.

Protective relays operate circuit breakers to isolate electrical instabilities, also called faults, on transmission lines and inside substations. Protective relays take voltage, current, and frequency measurements to determine the instance, type, and location of a fault. Relay settings turn these measurements into protective action to minimize the reach of a fault while maximizing the safety of facilities and service to customers. When a facility is added to the transmission system, the voltage, current, and frequency levels around that facility may change. New relays and/or new relay settings are likely needed.

Despite the importance of protective relays to the performance, reliability, and expansion of the transmission system, no accelerated certificate applications submitted since May 2019 mentioned their existence.³⁰ The absence of a discussion of protective relays, their settings, and their coordination in accelerated applications is both troubling and in conflict with R.C. 4906.10, which states that the Board shall not grant an accelerated certificate application unless it finds and determines “that the facility is 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 facility will serve the interests of electric system economy and reliability.”³¹

³⁰ See various Letters of Notification recorded in the Board’s Docketing Information System. See cases with Industry Code “EL” (electric), Purpose Code “BLN” (letter of notification), and Status “OPEN.”

³¹ R.C. 4906.10(A)(4).

OMAEG recommends that the Board amend proposed Rule 4906-6-05 to require a discussion of protective relays, protective relay settings, and protective relay coordination in accelerated certificate applications. Specifically, applications should require the following:

- Applicants proposing to change the thermal limit of conductors shall declare if and how this change will be reflected in the region’s protection scheme.³²
- Applicants proposing to change the interconnection of facilities—e.g., new and removed pathways between substations—shall declare if and how this change is accompanied by changes or modifications to the configuration of protective relays.

Accordingly, OMAEG respectfully requests that the Board adopt amendments to proposed Rules 4901-1-01 and 4906-6-05 as provided in Attachment A attached hereto.

E. Applicants filing under the accelerated review process should fully examine technical design and equipment selection alternatives, including qualitative and quantitative terms, which will assist in evaluating project alternatives.

Current Ohio Adm.Code 4906-6-05(B)(4) (which Staff has not proposed to amend) states:

The applicant shall describe the alternatives considered and reasons why the proposed location or route is best suited for the proposed facility. The discussion shall include, but not be limited to, impacts associated with socioeconomic, ecological, construction, or engineering aspects of the project.³³

The location or route of a proposed facility is the clear focus of this provision. But while important, this feature of Ohio Adm.Code 4906-6-05 constrains the Board’s oversight and misses an important opportunity to examine the technical design and equipment selection choices contained within an accelerated certificate application.

³² A “protection scheme” refers to a plan for protective action developed by a certified protection engineer that relies on one or more protective relays to mitigate the negative effects of electrical instabilities. As explained previously, the Board should amend proposed Rule 4901-1-01 to include this definition in order to provide more clarity in the rules.

³³ Ohio Adm.Code 4906-6-05(B)(4).

This deficiency is exacerbated by the many innovations rising to meet the performance and reliability needs of the electric power transmission industry today. Analyses of the cost and benefits of traditional upgrades to the transmission system must contend with the capabilities of grid-enhancing technologies³⁴ like distributed energy resources, microgrids, flexible AC transmission systems, dynamic line ratings, and special conductors and structures. For the Board's accelerated review process to become and remain an effective mechanism for targeting cost-effective and sensible transmission system investments and upgrades, proposed Rule 4906-6-05 should require a discussion of technical design and equipment selection alternatives in the manner outlined below:

- Improvements to an existing transmission facility shall be compared to and justified against a like-for-like replacement of that facility.
- Applicants that propose new or rebuilt transmission line conductors shall address grid-enhancing technologies in discussion of project alternatives (and vice-versa).
- Applicants that propose new transmission line pathways – including line taps, line extensions, and proposals to add and remove circuits – shall address grid-enhancing technologies in discussion of project alternatives (and vice-versa).

As such, OMAEG respectfully requests that the Board adopt amendments to proposed Rules 4901-1-01 and 4906-6-05(B)(10) and add an additional section regarding project alternatives as provided in proposed Rule 4906-6-05(B)(5). See Attachment A attached hereto.

F. The proposed definition of “associated facility” in proposed Rule 4906-1-01(F) places an undue burden on businesses seeking to construct electric power substations.

While placing public utility-owned substations that contain transmission and distribution voltages under Board certification will help curtail unfettered and unregulated spending by electric

³⁴ “Grid-enhancing technology” means a hardware and/or software component that increases the capacity, efficiency, and/or reliability of transmission and distribution grids, and may include customer-sited non-wire alternative resources such as energy storage systems, distributed energy resources, demand response. As explained previously, the Board should amend proposed Rule 4901-1-01 to include this definition in order to provide more clarity in the rules.

distribution utilities, which is eventually passed through to customers, the Board should avoid creating undue burden for those business customers seeking to construct their own substations. Staff's proposed amendments to existing Ohio Adm.Code 4906-1-01(F)(2)(b) would require a manufacturing customer constructing, on its own property for its own use, an electric substation that includes both transmission and distribution voltages to receive Board certification.

The costs associated with customer-owned substations are borne by the customer itself and adding an additional regulatory hurdle to these projects will make them more expensive, thereby lowering the benefit to customers who seek to construct their own substations. As such, these projects do not present the same risk of runaway spending by electric distribution utilities and Board certification is unnecessary.

Therefore, OMAEG recommends adding the phrase "public utility-owned" before the word "substations" as it is used in the first two instances of proposed Rule 4906-1-01(F)(2)(b). The following are OMAEG's proposed amendments to the language proposed by Staff for proposed Rule 4906-1-01(F)(2)(b):

~~Transmission voltage switching~~ Both **public utility-owned** substations that change electricity line voltage from one transmission voltage to another transmission voltage and **public utility-owned** substations that change line voltage between transmission voltage and distribution voltage ~~shall be classified~~ are considered as transmission substations and are considered associated facilities of transmission lines. ~~Pole-mounted transmission switching substations are excluded. Those stations that change electricity from transmission voltage to distribution voltage shall be classified as distribution substations, and are not considered associated facilities of transmission lines.~~

Accordingly, OMAEG respectfully requests that the Board adopt amendments to proposed Rule 4906-1-01(F)(2)(b) as provided above and in Attachment A attached hereto.

IV. CONCLUSION

Because OMAEG satisfies the criteria set forth in R.C. 4903.221 and Ohio Adm. Code 4901-1-11, it is authorized to intervene in this proceeding with the full powers and rights granted by the Board to intervening parties. Accordingly, OMAEG respectfully requests that the Board grant its petition to intervene and that OMAEG be made a full party of record. Additionally, OMAEG requests that the Board adopt amendments to Ohio Adm.Code Chapters 4906-1 through 4906-7 and Staff's proposed amendments thereto.

The Board's accelerated review process facilitates billions of dollars in transmission system investment with no documented reliability benefit. As such, OMAEG recommends amendments to the requirements of the accelerated certificate applications included in Ohio Adm.Code 4906-6-05 and proposed Rule 4906-6-05 in order for the transmission facility owner to document increased thermal capacity limits, increased physical capacity limits, the need for these increased limits, and that appropriate upgrades will be made to protective relay configurations to ensure that costly investments in the transmission system that are paid for by customers will produce reliability benefits. The additional data proposed will also provide transparency and will ensure that customers pay for only cost-effective and sensible investments in the transmission system.

For emphasis, on July 13, 2022, AEP Ohio and the PJM Regional Transmission Operator testified before the Commission that exceedance of thermal capacity limits and a protective relay failure were key causes of transmission facility failures in central Ohio during June of 2022. The exceedance of thermal capacity limits and failure of protective relays were cited as causes for "tripping" transmission facilities and AEP Ohio's subsequent intentional load shed of June 14 and 15, 2022. Both AEP Ohio and PJM explained that wider electric grid failures could have occurred, causing a near catastrophe. During the Commission's review of the June 2022 outages, AEP Ohio

representatives stated that they have done “...a lot of soul searching to see if there is something we could have done differently. With that I don’t see it.”

The transmission system failures in central Ohio in June 2022 demonstrate the need for a range of different approaches to transmission system regulation and operation to increase reliability. Modifications to the current approach and process are clearly necessary and prudent. Without change, Ohio’s manufacturers will be subject to repeated transmission system failures stemming from the same underlying conditions of extreme weather, lack of reliability documentation, and lack of coordination with customers and their power resources. Central Ohio is poised to become a leader in high-tech manufacturing that is sensitive to power disruption, and cannot afford inaction on the oversight process, checks and balances on transmission system spending, and improved reliability.

Adopting the recommendations delineated herein would provide the Board with the data and tools to ensure that the billions of customer dollars spent on transmission projects have documented reliability improvements, including the proposals that are submitted pursuant to the accelerated application process. Currently this is not the case. As discussed above, the Board has approved \$1.4 billion in accelerated transmission projects with no documented reliability benefits over the past three years. For this significant cost, Ohio’s manufacturers and other customers should be ensured the money spent is improving reliability to the transmission system. Without requiring documentation of reliability benefits, the accelerated certificate application process is a box to check in the release of billions of dollars of customer funds.

Respectfully submitted,

/s/ Kimberly W. Bojko

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CERTIFICATE OF SERVICE

The Ohio Power Siting Board'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 the case. In addition, the undersigned hereby certifies that a copy of the foregoing document also is being served via electronic mail on August 5, 2022 upon the parties listed below.

/s/ Kimberly W. Bojko
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AMENDED

4906-1-01 Definitions.

As used in Chapters 4906-1 to 4906-7 of the Administrative Code:

- (A) "Accelerated certificate application" means a letter of notification or construction notice filed with the board under the requirements of Chapter 4906-6 of the Administrative Code.
- (B) "Accepted, complete application" means a standard certificate application which the ~~chairman~~ chairperson or individual designated by the ~~chairman~~ chairperson declares in writing to be accepted and in compliance with the content requirements of section 4906.06 of the Revised Code, pursuant to section 4906.07 of the Revised Code and rule 4906-3-06 of the Administrative Code.
- (C) "Administrative law judge" means an attorney examiner of the public utilities commission.
- (D) "Agricultural district" means any agricultural district established pursuant to Chapter 929 of the Revised Code.
- (E) "Applicant" means any person filing an accelerated or standard application under Chapter 4906 of the Revised Code.
- (F) "Associated facility" or "associated facilities" is defined as follows:
 - (1) For a gas pipeline: rights-of way, land, structures, mains, valves, meters, compressors, regulators, tanks, overpressure protection equipment, and other transportation items and equipment used for the transportation of gas from ~~and~~ or to a gas pipeline.
 - (2) For an electric power transmission line:
 - (a) Where poles or towers support both transmission and distribution conductors, the poles, towers, anchors, guys and rights-of-way ~~shall be classified~~ are considered as associated facilities of the transmission line, while the conductors, crossarms, braces, grounds, tielines, insulators, etc., ~~shall be classified~~ are considered as associated facilities of transmission lines or distribution lines according to the purposes for which they are used.
 - (b) ~~Transmission voltage switching substations and~~ Both public utility-owned substations that change ~~electricity~~ line voltage from one transmission voltage to another transmission voltage ~~and~~ public utility-owned substations that change line voltage between transmission voltage and distribution voltage ~~shall be classified~~ are considered as transmission substations and are considered associated facilities of transmission lines. ~~Pole-mounted transmission switching substations are excluded. Those stations that change electricity from transmission voltage to distribution~~

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~~voltage shall be classified as distribution substations, and are not considered associated facilities of transmission lines.~~

- (c) Rights-of-way, land, permanent access roads, structures, breakers, switches, transformers, and other transmission items and equipment used for the transmission of electricity at voltages of one hundred ~~and twenty-five~~ kilovolts or greater ~~shall be classified~~ are considered as associated facilities of transmission lines.
- (3) For an electric power generation plant or wind farm: rights-of-way, land, permanent access roads, structures, tanks, distribution lines and substations necessary to interconnect the facility to the electric grid, water lines, pollution control equipment, and other equipment used for the generation of electricity.
- (G) "Board" means the Ohio power siting board, as established by division (A) of section 4906.02 of the Revised Code.
- (H) "Business day" means any day that is not a Saturday, Sunday, or legal holiday.
- (I) "Capacity" means the maximum electric output a generator can produce, and in the case of an electric storage resource store for later output back to the grid, under specific conditions and that is reflected as installed capacity in any system impact study conducted by PJM.
- (~~H~~) "Certificate" means a certificate of environmental compatibility and public need, issued by the board.
- (~~JK~~) "Certificate application" means an application filed with the board under the requirements of Chapters 4906-4 to 4906-6 of the Administrative Code.
- (~~KL~~) "ChairmanChairperson" means the ~~chairman~~ chairperson of the board as established by division (A) of section 4906.02 of the Revised Code.
- (~~LM~~) "Commence to construct" means any clearing of land, excavation, or other action that would adversely affect the natural environment of the site or route of a major utility facility, but does not include surveying changes needed for temporary use of sites or routes for nonutility purposes, or uses in securing geological data, including necessary borings to ascertain foundation conditions. This definition does not constitute a restriction on normal maintenance activities on any section of the proposed site or route that is located within an existing utility right-of-way.
- (~~MN~~) "Commercial operation" means the following:
- (1) For electric generation plants and wind farms, the output of any generation unit is capable of being delivered to the grid.
 - (2) For electric transmission lines and associated facilities, the line is interconnected to the grid.

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- (3) For gas pipelines, the gas is being transported through the pipeline in an attempt or offer to exchange the gas for money, barter, or anything of value.
- (~~NQ~~) "Commission" means the public utilities commission of Ohio, as established by division (A) of section 4901.02 of the Revised Code.
- (~~OP~~) "Construction notice" means a document filed with the board under the requirements of paragraph (C) of rule 4906-6-03 of the Administrative Code.
- (~~PQ~~) "Docketing division" means the commission's division responsible for the filing and maintenance of case documents.
- (~~QR~~) "Docketing information system" means the commission's system for electronically storing documents filed in a case, which is maintained by the commission's docketing division. The internet address of the docketing information system is <http://dis.puc.state.oh.us>. (RS) "Economically significant wind farm" means a wind-powered electric generation facility, including wind turbines and associated facilities, with a single interconnection to the electrical grid and designed for, or capable of, operation at an aggregate capacity of five megawatts or more but less than fifty megawatts.
- (~~ST~~) "Electric distribution line" means an electric power line that has a design ~~capacity~~ value of less than one hundred twenty-five kilovolts.
- (~~TU~~) "Electric power transmission line" (transmission line) means an electric power line that has a design ~~capacity~~ value of one hundred ~~twenty-five~~ kilovolts or more.
- (~~UV~~) "Electronic filing" (e-filing) means the submission of electronic files to the public utilities commission's docketing information system.
- (~~VW~~) "Electronic mail" (email) means the exchange of digital messages across the internet or other computer network.
- (WX) "Facility" means the proposed major utility facility and all associated facilities.
- (XY) "Gas" means natural gas, flammable gas, or gas that is toxic or corrosive. (YZ) "Gas pipeline" means a pipeline that is greater than five hundred feet in length, is more than nine inches in outside diameter, and is designed for transporting gas at a maximum allowable operating pressure in excess of one hundred twenty-five pounds per square inch and its associated facilities.
- (AA) "Generation" means the process of producing electrical energy by transforming other forms of energy.
- (BB) "Grid-enhancing technology" means a hardware and/or software component that increases the capacity, efficiency, and/or reliability of transmission and distribution grids, and may include customer-sited non-wire alternative resources such as energy storage systems, distributed energy resources, demand response.

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(CC) "Jurisdictional wind or solar facility" has the same meaning as "utility facility" in section 303.57 of the Revised Code.

(~~ZCC~~DD) "Letter of notification" means a document filed with the board under the requirements of paragraph (B) of rule 4906-6-03 of the Administrative Code.

(~~AA~~EE) "Major utility facility" means a facility that meets the definition of major utility facility set forth in section 4906.01 of the Revised Code.

(~~BB~~FF) "Manufacturing facility that creates byproducts that may be used in the generation of electricity" means a facility that produces exhaust heat or flue gases from engines or boilers used primarily for manufacturing processes and excludes facilities whose primary purpose is the generation of electricity.

(~~CC~~GG) "Maximum allowable operating pressure" means the maximum pressure at which a pipeline or segment of a pipeline may be operated under 49 C.F.R. 192~~192 as was effective on February 18, 2014.~~

(HH) "Open condition" means an instance of damage and or deterioration to a major utility facility or component thereof.

(~~DD~~II) "Person" means an individual, corporation, business trust, association, estate, trust, or partnership, or any officer, board, commission, department, division, or bureau of the state or a political subdivision of the state, or any other entity.

(~~EE~~JJ) "Potential disturbance area" means the area of land or water that may be cleared, graded, excavated, accessed with heavy equipment, constructed on, or otherwise directly disturbed for construction of the facility.

(~~FF~~KK) "Project" means all equipment, land, and activities required for construction, operation, and maintenance of the facility and associated facilities.

(~~GG~~LL) "Project area" means all land ~~within a contiguous geographic boundary~~ that contains components of the facility, as well as any real property for which land rights are necessary to be secured in order to construct and operate associated setbacks, and properties under lease or agreement that contain any components of the facility.

(MM) "Protection scheme" means a plan for protective action developed by a certified protection engineer that relies on one or more protective relays to mitigate the negative effects of electrical instabilities.

(~~HH~~NN) "Replacement of an existing facility with a like facility" means replacing an existing major utility facility with a major utility facility of equivalent size, rating and operating characteristics, and within the same right-of-way. If the existing facility includes material sizes and specifications that are no longer widely manufactured and available, ~~or no longer used by the applicant,~~ replacement with the nearest equivalent standard industry size and

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material available that meets the needs of the project is considered a replacement with a like facility.

(~~LL~~~~OO~~) "Resident" is determined by where a person is domiciled, and includes a tenant.

(~~MM~~~~PP~~) "Route" means, in the case of a proposed electric transmission line or gas pipeline, a proposed centerline and a proposed distance from each side of the centerline, with such total distance not to exceed the proposed right-of-way width. Route width may vary along the proposed electric transmission line or gas pipeline, as specified in the application.

(~~H~~~~QQ~~) "Specific customer or customers" means industrial or commercial end-use customer(s) in Ohio.

(~~J~~~~RR~~) "Staff" means the board staff.

(~~KK~~~~SS~~) "Standard certificate application" means a document filed with the board under the requirements of Chapter 4906-4 or Chapter 4905-5 of the Administrative Code.

(~~LL~~~~TT~~) "Substantial addition," in the case of an electric power transmission line or gas pipeline already in operation, is any addition or modification that meets any of the descriptions listed in the "Application Requirement Matrix" contained in appendix A and appendix B to this rule. Construction necessary to restore service of a transmission line damaged by reason of natural ~~disaster~~ or human-caused disaster or accident does not constitute a substantial addition and therefore does not ~~require~~ necessitate the filing of a certificate application. "Substantial addition," ~~in~~ in the case of an electric power generation plant, ~~it~~ is any modification of an operating generation plant which modification in itself constitutes a major utility facility or economically significant wind farm. Additions under this definition include, but are not limited to:

- (1) Addition of structures or equipment to an existing electric power generation facility that would result in a capacity increase ~~unit~~ of fifty megawatts or greater ~~to an existing plant~~.
- (2) Addition of a fifty megawatts or greater electric power generation unit which is designed to operate in conjunction with an existing unit to establish a combined-cycle unit.
- (3) Addition of an electric power generation unit to an existing plant which is not a major utility facility, or modification of an existing unit, with the result that the combined capacity of the new facility is fifty megawatts or greater.
- (4) Addition of a wind-powered electric generation turbine to an existing wind farm, with the result that the combined capacity of the new facility is five megawatts or greater.

(~~MM~~~~UU~~) "Wind farm" means a wind-powered electric generation facility, including wind turbines and associated facilities, with a single interconnection to the electrical grid.

AMENDED

4906-6-05 Accelerated application requirements.

- (A) Accelerated certificate applications shall comply with the form and content requirements outlined in Chapter 4906-2 of the Administrative Code.
- (B) Letter of notification and construction notice applications shall contain all data and information necessary to meet the following requirements of this rule, which, in the case of amendments to certificated facilities, refers to the change between the certificated facility and the facility as it would be amended:
- (1) The applicant shall provide the name of the project and applicant's reference number, names and reference number(s) of resulting circuits, a brief description of the project, and why the project meets the requirements for a letter of notification or construction notice application.
 - (2) If the proposed project is an electric power transmission line or gas pipeline, the applicant shall provide a statement explaining the need for the proposed facility-, including a listing of the factors upon which it relied to reach that conclusion.
 - (a) The applicant shall explain the purpose of the proposed facility.
 - (b) The applicant shall provide specific information, in a format acceptable to the board staff, on open conditions that impacted the applicant's opinion on the need for the proposed facility, including, but not limited to, the following:
 - (i) Type of open condition.
 - (ii) Location of the open condition.
 - (iii) Cause of the open condition including a discussion of the methods used by the applicant to arrive at their determination of causality.
 - (c) The applicant shall provide specific information, in a format acceptable to the board staff, on service interruptions that impacted the applicant's opinion on the need for the proposed facility, including, but not limited to, the following:
 - (i) Type of service interruption.
 - (ii) Location of the service interruption.
 - (iii) Cause of the service interruption including a discussion of the methods used by the applicant to arrive at their determination of causality.
 - (iv) Reliability index of aggregate service interruptions, in a format acceptable to the board staff and published in IEEE's Guide for Electric Power Distribution Reliability Indices, attributable to the need for the proposed facility.

(d) The applicant shall provide specific information on performance and reliability improvements that impacted the applicant's opinion on the need for the proposed facility, including, but not limited to, the following:

(i) Any increase in the weight-bearing limit of transmission line structures.

(ii) Any increase in the thermal limit of transmission line conductors.

(iii) Any modification to the interconnection of transmission lines and associated facilities.

(iv) A discussion of the justification of performance and reliability improvements as they relate to the purpose of the proposed facility, in a format acceptable to the board staff, supported by load flow studies depicting system performance with and without the proposed improvements.

(3) The applicant shall provide the location of the project in relation to existing or proposed lines and substations shown on an area system map of sufficient scale and size to show existing and proposed transmission facilities in the project area.

(4) The applicant shall describe the alternatives considered and reasons why the proposed location or route is best suited for the proposed facility. The discussion shall include, but not be limited to, impacts associated with socioeconomic, ecological, construction, or engineering aspects of the project.

(5) For electric power transmission lines, the applicant shall provide an analysis and evaluation of project alternatives for new and rebuilt electric power transmission lines and associated facilities. The discussion shall include, but not be limited to, the cost, performance benefits, and reliability benefits of repairs, like-for-like replacements, and grid-enhancing technologies wherever such alternatives are practicable.

~~(6)~~ (5) The applicant shall describe its public information program to inform affected property owners and ~~tenants~~ residents of the nature of the project and the proposed timeframe for project construction and restoration activities.

~~(7)~~ (6) The applicant shall provide an anticipated construction schedule and proposed in-service date of the project.

~~(8)~~ (7) The applicant shall provide a map of at least 1:24,000 scale clearly depicting the facility and proposed limits of disturbance with clearly marked streets, roads, and highways, and an aerial image.

~~(9)~~ (8) The applicant shall provide a list of properties for which the applicant has obtained easements, options, and/or land use agreements necessary to construct and operate the facility and a list of the additional properties for which such agreements have not been obtained.

~~(10)~~ (9) The applicant shall describe the following information regarding the technical features of the project:

~~(a) Operating characteristics, estimated number and types of structures required, and right-of-way and/or land requirements.~~

~~(a) Operating characteristics.~~

~~(b) Estimated number and types of structures required.~~

~~(c) Estimated length and types of conductors required.~~

~~(d) Right of way and/or land requirements.~~

~~(e) For electric power transmission lines and associated facilities, the protection scheme impacted by the project. The discussion shall include:~~

~~(i) A discussion of changes to the type, location, and/or number of protective relays needed to accommodate the project and its performance and reliability improvements (if applicable).~~

~~(ii) A discussion of changes and/or additions to protective relay settings needed to accommodate the project and its performance and reliability improvements (if applicable).~~

~~(f)~~ For electric power transmission lines that are within one hundred feet of an occupied residence or institution, the production of electric and magnetic fields during the operation of the proposed electric power transmission line. The discussion shall include:

(i) Calculated electric and magnetic field strength levels at one meter above ground under the lowest conductors and at the edge of the right-of-way for:

(a) Normal maximum loading.

(b) Emergency line loading.

(c) Winter normal conductor rating.

(ii) A discussion of the applicant's consideration of design alternatives with respect to electric and magnetic fields and their strength levels, including alternate conductor configuration and phasing, tower height, corridor location, and right-of-way width.

~~(g)~~ The estimated capital cost of the project.

~~(1140)~~ The applicant shall describe the social and ecological impacts of the project.

(a) Provide a brief, general description of land use within the vicinity of the proposed project, including a list of municipalities, townships, and counties affected.

(b) Provide the acreage and a general description of all agricultural land, and separately all agricultural district land, existing at least sixty days prior to submission of the application within the potential disturbance area of the project.

- (c) Provide a description of the applicant's investigation concerning the presence or absence of significant archeological or cultural resources that may be located within the potential disturbance area of the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.
- (d) Provide a list of the local, state, and federal governmental agencies known to have requirements that must be met in connection with the construction of the project, and a list of documents that have been or are being filed with those agencies in connection with siting and constructing the project.
- (e) Provide a description of the applicant's investigation concerning the presence or absence of federal and state designated species (including endangered species, threatened species, rare species, species proposed for listing, species under review for listing, and species of special interest) that may be located within the potential disturbance area of the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.
- (f) Provide a description of the applicant's investigation concerning the presence or absence of areas of ecological concern (including national and state forests and parks, floodplains, wetlands, designated or proposed wilderness areas, national and state wild and scenic rivers, wildlife areas, wildlife refuges, wildlife management areas, and wildlife sanctuaries) that may be located within the potential disturbance area of the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.
- (g) Provide any known additional information that will describe any unusual conditions resulting in significant environmental, social, health, or safety impacts.

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in

Case No(s). 21-0902-GE-BRO

Summary: Petition to Intervene, Memorandum in Support, and comments
electronically filed by Mrs. Kimberly W. Bojko on behalf of The Ohio Manufacturers'
Association Energy Group