

November 2, 2022

Ms. Tanowa Troupe
Docketing Division, Ohio Power Siting Board
The Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215-3793

Letter of Notification
Lakeview-Ottawa 138 kV Transmission Line
Reconductor Project
Case No. 22-0967-EL-BLN

Dear Ms. Troupe:

American Transmission Systems, Incorporated (“ATSI”), a FirstEnergy company, hereby transmits the enclosed Letter of Notification (“LON”) application, which has been completed in accordance with the requirements of Ohio Administrative Code Chapters 4906-2 and 4906-6. This Project is required by PJM RTEP baseline project (b3033) to resolve planning and reliability criteria violations identified by PJM under RTEP baseline project (b3033).

In this Project, ATSI is proposing to reconductor two sections of the existing Lakeview-Ottawa 138 kV Transmission Line. The first section—located in the City of Port Clinton, Portage Township, and Bay Township, Ottawa County—begins at Lakeview Substation and extends approximately 7.6 miles to an existing steel lattice tower (Str. 1448A) located on the eastern side of the Little Portage River. In this first section, ATSI will replace five existing steel lattice towers with new steel monopoles.

The second section is the last span of the line, from Structure 111.5 east of Ottawa Substation into Ottawa Substation: a segment that is approximately 160 feet long and located in Salem Township, Ottawa County. In this second section, ATSI will replace Structure 111.5—a steel lattice tower—with a new steel monopole.

a) Name and address of the applicant:

American Transmission Systems, Incorporated
76 South Main Street
Akron, Ohio 44308-1890

b) Name and location of proposed facilities:

Lakeview-Ottawa 138 kV Transmission Line Reconductor Project.
The Project is located in the City of Port Clinton, Portage Township, Bay Township, and Salem Township in Ottawa County.

c) Applicant's representative:

Eric M. Filicky
Transmission Specialist
Transmission and Substation Design
FirstEnergy Service Company
800 Cabin Hill Drive
Greensburg, PA 15601

Attorney for Applicant:

Devan K. Flahive (0097457)
Porter, Wright, Morris & Arthur LLP
41 South High Street, Suite 2900
Columbus, Ohio 43215
(614) 227-1989 / (614) 227-2100 (fax)
dflahive@porterwright.com (willing to accept service via e-mail)

d) The Project description that was provided in the pre-application notification letter required by OAC Rule 4906-6-03 has not been amended or changed in the attached Letter of Notification application.

e) A notarized statement that the information contained in the application is complete and accurate is provided as Attachment 1.

We have provided a copy of the Letter of Notification application by certified mail, with return receipt requested, to each official of the political subdivisions immediately affected by the proposed Project listed in Attachment 2. An exemplar transmittal letter, as sent to all the local government officials listed in Attachment 2 (representatives of Port Clinton, Portage Township, Bay Township, and Ottawa County) are enclosed for your file. A copy of the transmittal letters to the local library is also enclosed.

Should Staff of the Ohio Power Siting Board desire further information or discussion of this submittal, please contact me at (724) 830-5390.

Sincerely,



Eric M. Filicky
Transmission Specialist
Transmission and Substation Design
FirstEnergy Service Company

Attachments

**AMERICAN TRANSMISSION SYSTEMS,
INCORPORATED
A FIRSTENERGY COMPANY**

LETTER OF NOTIFICATION

**LAKEVIEW-OTTAWA 138 KV TRANSMISSION LINE
RECONDUCTOR PROJECT**

OPSB CASE NO.: 22-0967-EL-BLN

NOVEMBER 2, 2022

**American Transmission Systems, Incorporated
76 South Main Street
Akron, Ohio 44308**



05 Lakeview-Ottawa Attachment 1 - LON Affidavit.DOCX

DocVerify ID: D4DFCC78-142E-44A2-A775-2C916AE6E55E
Created: November 02, 2022 09:22:24 -5:00
Pages: 2
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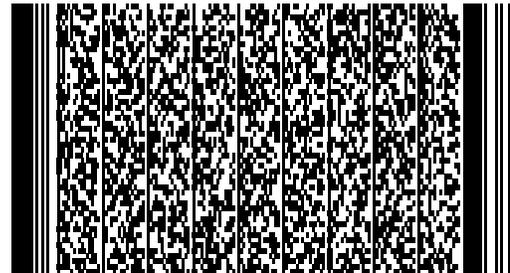
E-Signature Summary

E-Signature 1: Eric Filicky (EMF)

November 02, 2022 09:32:28 -5:00 [D4F3557EFC62] [73.79.10.39]
efilicky@firstenergycorp.com (Principal) (Personally Known)

E-Signature Notary: Kori R. Auman-Krebs (KRK)

November 02, 2022 09:32:28 -5:00 [8E26E57FF0C2] [148.108.100.237]
kauman@firstenergycorp.com
I, Kori R. Auman-Krebs, did witness the participants named above electronically sign this document.



**Lakeview-Ottawa 138 kV Transmission Line
Reconductor Project
Case Number 22-0967-EL-BLN**

Date: November 2, 2022

**Attachment 1
Acknowledgement of Eric Filicky**

D4DFCC78-142E-44A2-A775-2C916AE6E55E --- 2022/11/02 09:22:24 -5:00 --- Remote Notary



BEFORE THE
OHIO POWER SITING BOARD

In re Application of American)
Transmission Systems, Incorporated for a)
Certificate of Environmental)
Compatibility and Public Need for the)
Construction of the Lakeview-Ottawa 138)
kV Transmission Line Reconductor)
Project.)
)

Case No. 22-0967-EL-BLN

AFFIDAVIT OF ERIC M. FILICKY

I, Eric M. Filicky, state the following:

Pursuant to Ohio Administrative Code Rule 4906-2-04(A)(3)(e), I am the authorized representative of the Applicant in this case and I affirm that the Letter of Notification application filed in this matter is complete and correct to the best of my knowledge, information, and belief.


Eric M. Filicky
FirstEnergy Service Company

COMMONWEALTH OF PENNSYLVANIA)
)
COUNTY OF YORK)

SS:

11/02/2022

Sworn and subscribed before me this ____ day of November 2022.

Commonwealth of Pennsylvania - Notary Seal
Kori Rebecca Auman-Krebs, Notary Public
Berks County
My Commission Expires Feb 14, 2023
Commission Number 1345524


Notary Public

Notarial act performed by audio-visual communication



D4DFCC78-142E-44A2-A775-2C916AE6E55E --- 2022/11/02 09:22:24 -5:00 --- Remote Notary

Attachment 2
Officials to be Served a Copy of the Letter of Notification
Lakeview-Ottawa 138 kV Transmission Line Reconductor Project
Case No. 22-0967-EL-BLN

Ottawa County

Mr. Mark Stahl
Ottawa County Commissioner
315 Madison St.
Port Clinton, OH 43452

Mr. Mark Messa, Director
Ottawa County Regional Planning
Commission
315 Madison St.
Port Clinton, OH 43452

Mr. Mark Coppeler
Ottawa County Commissioner
315 Madison St.
Port Clinton, OH 43452

Mr. Ronald Lajti, Jr.
Ottawa County Engineer
8247 W State Route 163
Oak Harbor, OH 43449

Mr. Don Douglas
Ottawa County Commissioner
315 Madison St.
Port Clinton, OH 43452

Mr. Mike Libben
Ottawa County Soil & Water
240 West Lake Street
Oak Harbor, OH 43449

Port Clinton

Mayor Michael Snider
City of Port Clinton
1868 E. Perry St.
Port Clinton, OH 43452

Ms. Lisa Sarty
President of Council
1868 E. Perry St.
Port Clinton, OH 43452

Mr. Gabe Below
City Auditor
1868 E. Perry St.
Port Clinton, OH 43452

Mr. Tracy Colston
Port Clinton Safety Service Director
1868 E. Perry Street
Port Clinton, OH 43452

Portage Township

Ms. Molly B Sass
Portage Township Trustee
1398 S. Fulton St
Port Clinton, OH 43452

Mr. Karl Kopchak
Portage Township Trustee
1398 S. Fulton St
Port Clinton, OH 43452

Mr. Keith Heileman
Portage Township Trustee
1398 S. Fulton St
Port Clinton, OH 43452

Ms. Judith Johannsen
Portage Township Fiscal Officer
1398 S. Fulton St
Port Clinton, OH 43452

Bay Township

Mr. Art Castillo
Bay Township Trustee
4471 W Fremont Road
Port Clinton, OH 43452

Mr. Denton Glovinsky
Bay Township Trustee
4471 W Fremont Road
Port Clinton, OH 43452

Mr. Benny Peterson
Bay Township Trustee
4471 W Fremont Road
Port Clinton, OH 43452

Ms. Bonnie Kaspar
Bay Township Fiscal Officer
4471 W Fremont Road
Port Clinton, OH43452

Salem Township

Mr. Richard Lenke
Salem Township Trustee
P.O. Box 417
Oak Harbor, Ohio 43449

Mr. Randy Wilburn
Salem Township Trustee
P.O. Box 417
Oak Harbor, Ohio 43449

Mr. Todd Winke
Salem Township Trustee
P.O. Box 417
Oak Harbor, Ohio 43449

Mr. Aaron Avery
Salem Township Fiscal Officer
P.O. Box 417
Oak Harbor, Ohio 43449

Ottawa County Library

Ms. Lina Hall, Director
Oak Harbor Public Library
147 W. Main St
Oak Harbor, OH 43449

"An example copy of the transmittal letter to public officials and libraries is included, copies of which were sent to each public official and public library"

November 2, 2022

Mr. Mark Stahl
Ottawa County Commissioner
315 Madison St.
Port Clinton, OH 43452

Letter of Notification
Lakeview-Ottawa 138 kV Transmission Line
Reconductor Project
Case No. 22-0967-EL-BLN

Mr. Stahl,

American Transmission Systems, Incorporated ("ATSI"), a FirstEnergy company, is proposing to reconductor two sections of the existing Lakeview-Ottawa 138 kV Transmission Line. The first section begins at Lakeview Substation and extends approximately 7.6 miles to an existing steel lattice tower (Str. 1448A) located on the eastern side of the Little Portage River. This section is located in the City of Port Clinton, Portage Township and Bay Township, Ottawa County. In this first section, ATSI will replace five existing steel lattice towers with new steel monopoles.

The second section is the last span of the line, from Structure 111.5 east of Ottawa Substation into Ottawa Substation: a segment that is approximately 160 feet long and located in Salem Township, Ottawa County. In this second section, ATSI will replace Structure 111.5—a steel lattice tower—with a new steel monopole. This Project is required by PJM RTEP baseline project (b3033) to resolve planning and reliability criteria violations identified by PJM under RTEP baseline project (b3033).

In accordance with Appendix A of the Ohio Administrative Code ("OAC") Rule 4906-1-01, this Project falls within the Board's requirements for a Letter of Notification application. Therefore, in compliance with OAC 4906-6-07(A)(1), ATSI herein furnishes a service copy of the Letter of Notification application for this Project, which has been assigned Docket No. 22-0967-EL-BLN and contains a more detailed description of the Project for your information and review.

I will be happy to answer your questions concerning this matter. You can contact me at (724) 830-5390.

Sincerely,



Eric M. Filicky
Transmission Specialist
Transmission and Substation Design
FirstEnergy Service Company

November 2, 2022

Ms. Lina Hall, Director
Oak Harbor Public Library
147 W. Main St
Oak Harbor, OH 43449

Letter of Notification
Lakeview-Ottawa 138 kV Transmission Line
Reconductor Project
Case No. 22-0967-EL-BLN

Dear Ms. Hall,

Enclosed please find one copy of the Letter of Notification application of American Transmission Systems, Incorporated (“ATSI”), a FirstEnergy company, for the Lakeview-Ottawa 138 kV Transmission Line Reconductor Project (“Project”) that has been filed with the Ohio Power Siting Board (“Board”). Please make this Letter of Notification application available for public reference in the Oak Harbor Public Library as soon as practicable.

ATSI provides this copy of the Letter of Notification application in accordance with Ohio Administrative Code (“OAC”) Rule 4906-6-07(A)(2), which requires the Letter of Notification application in to be placed and made available for public inspection in main public library of each political subdivision in which any portion of the Project is to be located.

In this Project, American Transmission Systems, Incorporated (“ATSI”), a FirstEnergy company, is proposing to reconductor two sections of the existing Lakeview-Ottawa 138 kV Transmission Line. Section one is an approximate 7.6-mile line reconductor starting at Lakeview Substation and extending in a generally south/westerly direction to an existing structure (Str. 1448A) on the eastern side of the Little Portage River. This section is located in the City of Portage, Portage Township and Bay Township, Ottawa County. Section two is an approximate 160-foot line reconductor of the last span outside and east of Ottawa Substation located in Salem Township, Ottawa County. The project is needed to resolve NERC, PJM, and FE planning criteria violations identified by PJM under RTEP baseline project (b3033). The Project is located in the City of Port Clinton, Portage Township, Bay Township, and Salem Township in Ottawa County.

Please feel free to call me at (724) 830-5390 with any question you have on making the Letter of Notification application available to your patrons.

Sincerely,



Eric M. Filicky
Transmission Specialist
Transmission and Substation Design
FirstEnergy Service Company

**LETTER OF NOTIFICATION
LAKEVIEW-OTTAWA 138 KV TRANSMISSION LINE
RECONDUCTOR PROJECT**

The following information is being provided in accordance with the procedures in the Ohio Administrative Code (“OAC”) Chapter 4906-6 for the application and review of Accelerated Certificate Applications. Based upon the requirements found in Appendix A to OAC Rule 4906-1-01, this Project qualifies for submittal to the Ohio Power Siting Board (“OPSB”) as a Letter of Notification application.

4906-6-05: ACCELERATED APPLICATION REQUIREMENTS

4906-6-05(B)(1): Name and Reference Number

Lakeview-Ottawa 138 kV Transmission Line Reconductor Project (“Project”) (3055).

4906-6-05 (B)(1): Brief Description of the Project

In this Project, American Transmission Systems, Incorporated (“ATSI”) proposes to reconductor two sections of the existing Lakeview-Ottawa 138 kV Transmission Line:

- Section one is an approximately 7.6-mile-long line reconductor starting at Lakeview Substation, initially proceeding south and then turning west to an existing structure (Str. 1448A) on the eastern side of the Little Portage River. This section is located in the City of Port Clinton, Portage Township and Bay Township, Ottawa County
- Section two is an approximately 160-foot-long line reconductor of the last span east of (and connecting to) Ottawa Substation located in Salem Township, Ottawa County.

The general location of the Project is shown in Exhibit 1, a partial copy of the United States Geologic Survey Quad Map. A copy of ESRI aerial imagery of the Project area is shown in Exhibit 2.

As shown on the general Project layout (Exhibit 3), six existing steel lattice towers will be replaced with steel monopoles on concrete foundations, of which five (#1467,#1461, #1398, #1423, #1424) are in the first section and the sixth (#111.5) is the structure east of Ottawa Substation:

- Structures 1398 and 1467 will be replaced along the same transmission line centerline, approximately 79 feet from existing locations.
- Structures 111.5, 1423 and 1424 will be replaced along the same transmission line centerline, approximately 25 feet from existing locations.
- Structure 1461 will be replaced approximately 25 feet from existing location. Due to this structure being an angle structure, this shift will result in a deviation of 25 feet from the existing centerline.

In addition to the structure replacements, ATSI plans to modify forty-two (42) existing steel lattice structures within the first reconductor section by replacing structure members and insulators. The modifications are necessary to support the change in the loading on the existing structures from the new conductors.

4906-6-05 (B)(1): Letter of Notification Requirements

The Project meets the requirements for a Letter of Notification application because the Project is within the types of projects defined by Item (2)(b) of the Application Requirement Matrix for Electric Power Transmission Lines, Appendix A of OAC Rule 4906-1-01. This item states:

(2) Adding new circuits on existing structures designed for multiple circuit use, replacing conductors on existing structures with larger or bundled conductors, adding structures to an existing line or replacing structures with a different type of structure, for a distance of:

(b) more than two miles.

The proposed Project is within the requirements of Item (2)(b) because it involves replacing existing transmission line conductors with conductors of greater capacity and replacing existing structures with a different type of structure for a distance of more than two miles.

4906-6-05 (B)(2): Need For the Project

The Lakeview-Ottawa 138 kV Transmission Line serves Ottawa, Erie and Lorain Counties. It is also one of the primary transmission lines engaged in transporting power from renewable electric generation facilities in northwest Ohio to the Greater Cleveland area. The proposed Project is required by PJM RTEP baseline project (b3033) to resolve planning and reliability criteria violation. This baseline project, which is needed to reinforce ATSI's 138 kV transmission system, encompasses both the Project presented in this Application as well as non-jurisdictional upgrades to associated terminal equipment at Lakeview Substation and Ottawa Substation. Completion of the PJM baseline project will enhance the reliability, resiliency, efficiency, and operational flexibility of the transmission system in the Project area.

More specifically, PJM identified a thermal criteria violation on the Lakeview-Ottawa 138 kV Transmission Line in the 2018 RTEP 2023 Generation Deliverability study for a common tower failure of the Davis Besse-X1-027A and the Beaver-Hayes 345 kV transmission lines. The contingency would result in a thermal violation of the Lakeview-Ottawa 138 kV Transmission Line above the PJM and FE transmission emergency maximum thermal operating limit.

This Project was submitted as a baseline upgrade project to PJM. The first read of the project was at the PJM Sub-Regional RTEP - Western Committee meeting on August 31, 2018, and the second read was on September 28, 2018. The Project will improve operational flexibility, efficiency, and increase the 138 kV system thermal capacity above the loading that occurs under the Planning Event P7 (common tower failure tripping Davis Besse-X1-027A and the Beaver-Hayes 345 kV transmission lines) contingency condition. PJM evaluated the proposed Project and did not identify any additional FirstEnergy or PJM

Planning Criteria violations caused by the Project. As such, there is no additional need for other network system upgrades as a result of the Project. PJM assigned the Project baseline upgrade identification number b3033. The PJM presentation slide from the September 28, 2018, meeting is included as Exhibit 4 and includes additional details of the project drivers.

4906-6-05 (B)(3): Location of the Project Relative to Existing or Proposed Lines

The location of the Project relative to existing or proposed lines is shown in the ATSI Transmission Network Map, included as part of the confidential portion of the FirstEnergy Corp. 2022 Long-Term Forecast Report. This map was submitted to the Public Utilities Commission of Ohio (“PUCO”) in Case No. 22-0504-EL-FOR under Rule 4901:5-5:04 (C)(2)(b) of the Ohio Administrative Code. The map is incorporated by reference only. This map shows ATSI’s 345 kV and 138 kV transmission lines and transmission substations, including the Lakeview-Ottawa 138 kV Transmission Line. The Project is included on page 49 in ATSI’s LTFR filed in 2022. The general location and layout of the Project is shown in Exhibits 1 through 3.

4906-6-05 (B)(4): Alternatives Considered

ATSI did not engineer any alternatives because the only other means of resolving criteria violations as required by PJM RTEP baseline project (b3033) would be to construct a new 138 kV transmission line from Lakeview Substation to Ottawa Substation. The proposed Project is best suited for the recommended reinforcement because the Project will occur entirely on an existing right of way, requires no new land acquisition, minimizes environmental impacts, and is the most cost effective.

4906-6-05 (B)(5): Public Information Program

ATSI’s manager of External Affairs will advise local officials of features and the status of the proposed Project as necessary. ATSI will maintain a copy of this Letter of Notification on FirstEnergy’s website:

https://www.firstenergycorp.com/about/transmission_projects/ohio.html.

ATSI will publish notice of the Project in The Port Clinton News Herald within 7 days of filing this Letter of Notification application. The notice will comply with OAC 4906-6-

08(A)(1)-(6). In addition to the public notice, ATSI will mail letters in accordance with OAC 4906-6-08(B) explaining the Project to affected and adjacent property owners and affected tenants, informing them of the Project's anticipated construction and restoration activities sequencing, including the start date and overall time frame.

During all phases of this Project, the public may contact ATSI through the transmission projects hotline at 1-888-311-4737 or via email at: transmissionprojects@firstenergycorp.com.

4906-6-05 (B)(6): Construction Schedule

The construction schedule for this Project is expected to begin as early as February 6, 2023, and completed by December 2023.

4906-6-05 (B)(7): Area Map

Exhibit 1 depicts the general location of the Project. This Exhibit provides a partial copy of the United States Geologic Survey Quad Map. Exhibit 2 is a copy of ESRI aerial imagery of the Project area.

4906-6-05 (B)(8): List of Properties

The Project is located within existing right-of-way. No new easements will be required for the completion of this Project. See Exhibit 7 for a list of properties impacted by the Project.

4906-6-05 (B)(9): TECHNICAL FEATURES OF THE PROJECT

4906-6-05 (B)(9)(a): Operating Characteristics

The construction will have the following characteristics:

Voltage:	138 kV
Existing Conductor:	795 kcmil 26/7 ACSR (#1467 - Lakeview) 336.4 kcmil 26/7 ACSR (6-wire) (#1448A - #1467) 954 kcmil 48/7 ACSR (Ottawa - #111.5)
New Conductor:	795 kcmil 26/7 ACSS (#1467 - Lakeview) 336.4 kcmil 26/7 ACSS (6-wire) (#1448A - #1467) 795 kcmil 26/7 ACSS (Ottawa - #111.5)
Existing Structures:	Steel Lattice
New Structures:	Steel Monopole (six)
Static Wire:	3#6 Alumoweld & SFSJ-J-6641 OPGW

Insulators: Porcelain and/or Polymer
 ROW Width: 100 feet
 Structure Types: Exhibit 5: Double Circuit Steel Monopole Deadend on a Concrete Foundation (2 Structures Needed)
 Exhibit 6: Double Circuit Steel Monopole Tangent on a Concrete Foundation (4 Structures Needed)

4906-6-05 (B)(9)(b): Electric and Magnetic Fields

For the first reconductor section (7.6-mile-long construction corridor, Structures 1448A-1467) of the Project, there are six (6) occupied residences or institutions within 100 feet from the edge of the right-of-way. The closest occupied residence or institution is approximately 15 feet from the edge of right-of-way containing the proposed Project. Therefore, Electric and Magnetic Field (“EMF”) calculations are required and have been provided below.

4906-6-05 (B)(9)(b)(i): Calculated Electric and Magnetic Fields Strength Levels

Table 2 itemizes the line loading of the Lakeview-Ottawa 138 kV Transmission Line and the Greenfield-Lakeview 138 kV Line which parallels the Lakeview-Ottawa line and is within the same right-of-way from Str. 1461 to the Lakeview Substation. The normal line loading represents FirstEnergy’s peak system load for the transmission lines. The emergency line loading represents the maximum line loading under contingency operation. The winter rating is calculated based on weather and system variables that ATSI has modeled.

Table 2: Transmission Line Loading

Line Name	Normal Loading Amps	Emergency Loading Amps	Winter Rating Amps
Lakeview-Ottawa 138 kV Transmission Line	505	1026	1876
Greenfield-Lakeview 138 kV Transmission Line	253	756	1508

Table 3 calculates the electric and magnetic field strengths at the edge of the 200-foot-wide right-of-way for the Lakeview-Ottawa and Greenfield-Lakeview 138 kV Transmission Lines, accounting for the lines’ structural configuration (tangent structure to tangent structure) based on specific assumptions utilizing the EPRI EMF Workstation 2015

program software. This program software assumes the transmission line configuration is located on flat terrain and uses a balanced, three-phase circuit loading for the transmission circuit. The model utilizes the normal, emergency, and winter rating of the transmission lines.

Table 3: EMF Calculations for Lakeview-Ottawa 138kV Transmission Line and Greenfield-Lakeview 138kV Transmission Line: Tangent to Tangent

Lakeview-Ottawa 138kV Transmission Line and Greenfield-Lakeview 138kV Transmission Line: Tangent Structure to Tangent Structure		Electric Field (kV/m)	Magnetic Field (mG)
Normal Loading	Under Lowest Conductors	1.577	69.08
	At Right-of-Way Edges	0.162 / 0.412	14.37 / 34.25
Emergency Loading	Under Lowest Conductors	1.577	144.41
	At Right-of-Way Edges	0.162 / 0.412	36.68 / 52.45
Winter Rating	Under Lowest Conductors	1.577	266.37
	At Right-of-Way Edges	0.162 / 0.412	75.43 / 131.21

By contrast, Table 4 calculates the electric and magnetic field strengths at the edge of the 100-foot-wide right-of-way for only the Lakeview-Ottawa 138 kV Transmission Line, accounting for the Project’s structural configuration (tangent structure to tangent structure) based on specific assumptions utilizing the EPRI EMF Workstation 2015 program software. This program software assumes the transmission line configuration is located on flat terrain and uses a balanced, three-phase circuit loading for the transmission circuit. The model utilizes the normal, emergency, and winter rating of the transmission lines.

Table 4: EMF Calculations for Lakeview-Ottawa 138kV Transmission Line: Tangent to Tangent

Lakeview-Ottawa 138kV Transmission Line: Tangent Structure to Tangent Structure		Electric Field (kV/m)	Magnetic Field (mG)
Normal Loading	Under Lowest Conductors	1.605	65.08
	At Right-of-Way Edges	0.271	40.3
Emergency Loading	Under Lowest Conductors	1.605	132.18
	At Right-of-Way Edges	0.271	81.88
Winter Rating	Under Lowest Conductors	1.605	241.68
	At Right-of-Way Edges	0.271	149.72

4906-6-05 (B)(9)(b)(ii): Alternative Design Consideration for Electric and Magnetic Fields

The strength of EMFs can potentially be reduced by installing the transmission line conductors in a compact configuration and, for single circuit multiple conductor transmission lines, by selecting conductor phasing that reduces the field strengths. As a transmission line reconductor project, no alternative design considerations were feasible. ATSI designs its facilities according to the requirements of the National Electrical Safety Code (“NESC”). The pole heights and configuration were chosen based on NESC specifications, engineering parameters, and cost.

4906-6-05 (B)(9)(c): Estimated Cost

The estimated capital cost for the proposed Project is approximately \$6,606,000.

4906-6-05 (B)(10): SOCIAL AND ECOLOGICAL IMPACTS

4906-6-05 (B)(10)(a): Land Uses

The Project is located in the City of Port Clinton, Portage Township, Bay Township, and Salem Township in Ottawa County. The main land use around the Project area is zoned as agricultural and light manufacturing. The Project is located within existing right-of-way, so no changes or impacts to the current land use are anticipated.

4906-6-05 (B)(10)(b): Agricultural Land

Agricultural land, largely cultivated cropland, is present within the Project Area. Because this Project primarily entails reconductoring, there will only be minor disturbances to cropland around each of the 6 structures to be replaced. Each structure replacement will be changing from a steel lattice tower to a steel monopole, which will result in a much smaller footprint. The properties with structure replacements will have a net gain in farmable land after this project is complete.

Prior to construction, ATSI’s construction liaison will contact the landowners to discuss the specific construction activities on the property. ATSI will follow its routine construction and complaint resolution practices in the unlikely event of crop damage. This Project does not cross any parcels that participate in the Agricultural District program.

4906-6-05 (B)(10)(c): Archaeological or Cultural Resources

As part of its investigation, ATSI performed a desktop review of the Ohio Historic Preservation Office (“OHPO”) online database on September 7, 2022, to identify the existence of any significant archeological or cultural resource sites within 0.5 miles of the Project potential disturbance area. A map of the results of the search is shown in Exhibit 8.

The OHPO database includes all Ohio listings on the National Register of Historic Places (“NRHP”), including districts, sites, building, structures, and objects that are significant in American history, architecture, archeology, engineering, and culture. The results of the search indicate that no listed NRHP sites and no NRHP eligible sites were identified within 0.5 miles of the Project potential disturbance area.

The OHPO database also includes listing of the Ohio Archaeological Inventory (“OAI”), the Ohio Historic Inventory (“OHI”), previous cultural resource surveys, and the Ohio Genealogical Society (“OGS”) cemetery inventory. There is one (1) OAI resource listed within 0.5 miles of the Project area and is listed in Table 5. There is one (1) OHI structure is listed within 0.5 miles of the Project area and is listed in Table 6. Two (2) previous cultural resource surveys were conducted within 0.5 miles of the Project area and are identified in Table 7. No new impacts to any culturally significant resources are expected because this Project involves reconductoring work within existing transmission line right-of-way and. no historical, cultural, or archaeological resources fall within the right-of-way. effects to any cultural or archaeological resources.

Table 5. List of OAI Listed Archeological Resources

OAI Number	Affiliation	Description	County	Quad Name
OT0305	Unknown	Protohistoric	Ottawa	Wightmans Grove

Table 6. List of OHI Listed Structural Resources

OHI Number	Present Name	Historic Use	County	Municipality
OTT0058109	Amy Hyde Property	Single Dwelling	Ottawa	Bay Township

Table 7. List of Previous Cultural & Historic Resource Survey

Year	Name	County
2004	Construction of a Stealth Monopole/Flagpole at 1025 E 5th St, Port Clinton, Ottawa County, Ohio (OH DT Port Clinton 28093)	Ottawa
2017	Phase I Cultural Resources Management Survey for the Approximately 5 ac. Shepard Crossing Housing Development Located in the City of Port Clinton, Ottawa County, Ohio	Ottawa

4906-6-05 (B)(10)(d): Local, State and Federal Government Requirements

Table 8 shows the list of government agency requirements and the application status at the time of filing.

Table 8. List of Government Agency Requirements to be Secured Prior to Construction

Agency	Permit Requirement	Status
Ohio Environmental Protection Agency (OEPA)	General NPDES Construction Storm Water Permit OHC000005	To be filed
Ohio Department of Transportation	Access Drive and Highway Occupancy Permits – MR505	To be filed
Ottawa County	Access Drive Permit	To be filed
	Special Permit – Overhead Crossings	To be filed
	Floodplain Development Permit	To be filed
	Oversize Hauling Permit – if loads are applicable	To be filed

City of Port Clinton	Floodplain Development Permit	To be filed
United States Army Corps of Engineers (USACE)	Pre-Construction Notification (PCN) Nationwide Permit 57	To be filed

4906-6-05 (B)(10)(e): Endangered, Threatened, and Rare Species Investigation

AECOM Technical Services, Inc. (AECOM), submitted a request to the Ohio Department of Natural Resources (“ODNR”) to conduct an Environmental Review of the Project area on November 19, 2019. As part of the Environmental Review, the ODNR conducted a search of the ODNR Division of Wildlife’s Natural Heritage Database to research the presence of any endangered, threatened, or rare species within one (1) mile of the Project area. The ODNR’s response on February 5, 2020, stated that the Natural Heritage Database contained two (2) state endangered species, six (6) state threatened species, four (4) state species of concern, and four (4) state special interest species as well as Little Portage Wildlife Area and Port Clinton Lakeshore Preserve within a one (1) mile radius of the Project area. (See Exhibit 9 attached hereto.) The ODNR’s Division of Wildlife (DOW) commented that the Project is within range of fourteen (14) state endangered species and one (1) state threatened species. Therefore, a total of thirty-one (31) listed species composed of sixteen (16) state endangered species, seven (7) state threatened species, four (4) state species of concern, and four (4) state special interest species were identified within range of the Project and/or within one (1) mile radius of the Project area. Due to the passage of time since the original consultation, AECOM, on behalf of ATSI, has requested that the ODNR to re-verify the results of the previous Environmental Review.

AECOM also submitted a request to the U.S. Fish and Wildlife Service (“USFWS”) requesting their technical assistance regarding federally listed endangered or threatened species within the Project area on November 19, 2019. On December 30, 2019, the USFWS identified that the Project is within range of the federal and state endangered Indiana bat (*Myotis sodalis*), the federally threatened northern long-eared bat (*Myotis septentrionalis*), the federally threatened eastern massasauga (*Sistrurus catenatus*), and the federally threatened eastern prairie fringed orchid (*Platanthera leucophaea*). (See Exhibit 10 attached hereto.) Additionally, the USFWS identified that the Project is within range

of the federally protected bald eagle (*Haliaeetus leucocephalus*) and recommended avoidance of tree clearing within 660 feet of a bald eagle nest or within any woodlot supporting a nest tree. Due to the passage of time since the original consultation, AECOM requested that the USFWS re-verify the results of their technical assistance regarding threatened and endangered species within range of the Project.

A list of all endangered, threatened, and rare species, as identified by ODNR, DOW and USFWS, is provided in Table 9.

Table 9. List of Endangered, Threatened, and Rare Species

Common Name	Scientific Name	Federal Listed Status	State Listed Status	Affected Habitat
Mammals				
Indiana bat	<i>Myotis sodalis</i>	Endangered	Endangered	Trees and forests
Northern long-eared bat	<i>Myotis septentrionalis</i>	Threatened	Threatened	Trees and forests
Birds				
Kirtland's warbler	<i>Setophaga kirtlandii</i>	NA	Endangered	Forested or Shrub/Scrub habitat within 3 miles of Lake Erie Shoreline.
Piping Plover	<i>Charadrius melodus</i>	Endangered	Endangered	Does not nest within Ohio.
American bittern	<i>Botaurus lentiginosus</i>	NA	Endangered	Bogs, large wet meadows, or dense shrub wetlands with small scattered pools
Cattle egret	<i>Bubulcus ibis</i>	NA	Endangered	Wetlands, dry pastures and fields
Black tern	<i>Chlidonias niger</i>	NA	Endangered	Large, undisturbed inland marshes with dense vegetation and pockets of open water
Common tern	<i>Sterna hirundo</i>	NA	Endangered	Natural or man-made islands, beaches or dredge disposal areas, and in grass-lined depressions in the sand.
King rail	<i>Rallus elegans</i>	NA	Endangered	Deep bowls of dense vegetation in marshes
Upland sandpiper	<i>Bartramia longicauda</i>	NA	Endangered	Grasslands and pastures
Northern harrier	<i>Circus cyaneus</i>	NA	Endangered	Large marshes and grasslands

Bald Eagle	<i>Haliaeetus leucocephalus</i>	Protected	NA	Tall trees along open water systems such as estuaries, lakes, reservoirs, and rivers.
Reptiles				
Blanding's turtle	<i>Emydoidea blandingii</i>	N/A	Threatened	Marshes, Ponds, Lakes & Streams
Eastern massasauga	<i>Sistrurus catenatus</i>	Threatened	Endangered	Wet prairies, fens, and other wetland habitats.
Mussels				
Eastern pondmussel	<i>Ligumia nasuta</i>	NA	Endangered	Rivers
Threehorn wartyback	<i>Obliquaria reflexa</i>	NA	Threatened	Rivers
Black sandshell	<i>Ligumia recta</i>	NA	Threatened	Rivers
Fawnsfoot	<i>Truncilla donaciformis</i>	NA	Threatened	Rivers
Fish				
Western banded killifish	<i>Fundulus diaphanous menona</i>	NA	Endangered	Perennial Streams
Pugnose minnow	<i>Opsopoeodus emiliae</i>	NA	Endangered	Perennial Streams
Lake sturgeon	<i>Acipenser fulvescens</i>	NA	Endangered	Perennial Streams
Spotted gar	<i>Lepisosteus oculatus</i>	NA	Endangered	Perennial Streams
Channel darter	<i>Percina copelandi</i>	NA	Threatened	Lakes and streams
Plants				
Eastern prairie fringed orchid	<i>Platanthera leucophaea</i>	Threatened	Threatened	Forest edges, disturbed areas
Schweinitz' umbrella-sedge	<i>Cyperus schweinitzii</i>	NA	Threatened	Meadow, Field, and Lake Shores

Both the ODNR and USFWS indicated the Project was within range of the Indiana bat and USFWS also identified the Project as being within range of the northern long-eared bat. The ODNR and USFWS recommended of adherence to seasonal tree cutting between October 1 and March 31 to avoid adversely impacting the listed bat species. Because the Project is situated within existing ROW, however, tree clearing activities are anticipated to

be limited; any tree clearing is required, ATSI will adhere to the seasonal restriction. Therefore, no adverse effects to these listed species are anticipated as result of this Project.

ODNR's response requested no in-water work in perennial streams of sufficient size to avoid impacts to several mussel species (Eastern pondmussel, Threehorn wartyback, Black sandshell, and Fawnsfoot), as well as no in-water work in perennial streams between April 15 and June 30 to reduce impacts to several fish species (Western banded killifish, Pugnose minnow, Lake sturgeon, Spotted gar, and Channel darter).

ATSI will utilize temporary timber mat bridges (or equivalent) installed above the ordinary high-water mark (OHWM) for all equipment crossings of streams to avoid in-water work and impacts to these listed species. However, one perennial stream (Stream LG-01) requires a replacement of the existing culvert and in-water work will be required. According to the April 2022 Ohio Mussel Survey Protocol, Stream LG-01 is not listed as a Group 1, 2, 3, and/or 4 stream and does not have a watershed greater than five square miles. Therefore, Stream LG-01 is not sufficient size to provide habitat for the listed mussel species. Regarding the listed fish species, ATSI intends to adhere to the seasonal restriction and no in-water work will be completed within Stream LG-01 between April 15 and June 30. Therefore, no adverse effects to these listed species are anticipated as result of this Project.

The ODNR requested a habitat survey to be completed for the Blanding's turtle and, if suitable habitat is identified, that a presence/absence survey or avoidance/minimization plan be developed and implemented by an approved herpetologist. Additionally, the USFWS requested a habitat assessment to be completed by an approved herpetologist for the eastern massasauga. Therefore, ATSI retained Jeff Davis, an approved ODNR/USFWS herpetologist, to complete the habitat survey for both Blanding's turtle and eastern massasauga on October 1, 2021 (Exhibit 11). Mr. Davis determined that the only record of the Eastern Massasauga from mainland Ottawa County was over 50 years old; other records of the Eastern Massasauga, as found in the United States National Museum, were from the Lake Erie islands. Moreover, the mainland record was collected from a locality separated from the Project area by more than one mile of agricultural land. Therefore, the

habitat assessment concluded that no further consideration for the eastern massasauga is warranted for this Project.

Potential suitable habitat for the Blanding's Turtle was identified within the Project area around Structures 1404 to 1409 and 1444 to 1448A. Mr. Davis therefore recommends that an ODNR-approved herpetologist be on site when construction involves the use of heavy equipment within these areas. Additionally, Mr. Davis also recommends that the use of heavy equipment around these structures could impact the turtles and nests unless work is conducted between November and March, when the species is hibernating. ATSI is proposing for the Structures 1405 through 1409 as reconductoring only with access being provided by either helicopter and/or on-foot. However, work activities are being proposed on Structure 1404 as well as between Structures 1444 and 1448A. Therefore, ATSI intends to have Mr. Davis on-site to monitor construction activities at Structure 1404 and between Structures 1444 and 1448A as an effort to avoid impacting the listed species, if observed. Concurrence from the USFWS and ODNR regarding the habitat assessment and Mr. Davis' recommendations are provided in Exhibit 12.

The ODNR indicated that the Project is within range of Kirtland's warbler. However, Kirtland's warbler was delisted federally and is no longer listed as a protected species by the ODNR's Division of Wildlife as of July 2022. Therefore, no further coordination is necessary regarding this species and/or impacts to this species habitats.

The ODNR indicated that the Project is within range of piping plover but commented that this species does not nest within the state of Ohio and only utilizes the region for stopover habitat. Therefore, due to location, and type of work proposed, this Project is not likely to impact this species.

The Project area is within range of American bittern and ODNR identified potential nesting habitat as being large, undisturbed wetlands with scattered small pools amongst dense vegetation including bogs, large wet meadows, and dense shrubby swamps. Therefore, the ODNR recommends that this species nesting habitat be avoided between May 1 and July

31. ATSI will adhere to the seasonal restriction and no further coordination is warranted for this species.

The ODNR identified the Project is within range of cattle egret, which nests over or near water, in shrubs or small trees. The ODNR recommended that this species' nesting habitat be avoided between May 15 to August 15. ATSI will adhere to the seasonal restriction and no further coordination is warranted for this species.

The response from ODNR indicated the Project is within range of the black tern and that impacts to large, undisturbed inland marshes with dense vegetation and pockets of open water should be avoided during the nesting period of April 1 to June 30. ATSI will adhere to the seasonal restriction and no further coordination is warranted for this species.

The ODNR indicated the Project is within range of the common tern and that impacts to natural or man-made islands that are free of mammalian predators or human disturbances should be avoided during the nesting period of May 1 to August 1. ATSI will adhere to the seasonal restriction and no further coordination is warranted for this species.

The ODNR indicated the Project is within range of the king rail and that impacts to deep bowls constructed out of grass and within wetlands should be avoided during the nesting period of May 1 to August 1. ATSI will adhere to the seasonal restriction and no further coordination is warranted for this species.

The ODNR indicated the Project is within range of the northern harrier and that impacts to large marshes and grasslands should be avoided during the nesting period of May 15 to August 1. ATSI will adhere to the seasonal restriction and no further coordination is warranted for this species.

The ODNR indicated the Project is within range of the upland sandpiper and that impacts to dry grasslands, including native grasslands, seeded grasslands, hayfields, and grazed and un-grazed pastures, should be avoided during the nesting period of April 15 to July 31. ATSI will adhere to the seasonal restriction and no further coordination is warranted for this species.

The USFWS indicated that the Project is within range of the Bald Eagle and requested that tree clearing activities not occur within 660 feet of a bald eagle nest or within any woodlot supporting a nest as well as that no work occur within direct line-of-site of a nest between January 15 and July 31. Additionally, the USFWS National Bald Eagle Management Guidelines requires avoidance of operation of aircrafts (helicopters) within 1,000 feet of a known bald eagle nest. Therefore, AECOM, on behalf of ATSI, continued coordination with USFWS regarding known nest locations near the Project area. AECOM first provided locations to USFWS on December 14, 2021. Due to the location of one of the three known nests within 660 feet of Structure 1411 and within 1,000 feet of Structures 1410 and 1412, ATSI modified construction plans to access Structures 1410 to 1412 by foot instead of by helicopter for reconductoring. The USFWS concurred with the minimization measures on February 16, 2022. Then on March 22, 2022, AECOM requested USFWS' concurrence that the known nesting locations would be sufficient for the development of the minimization measures, along with a requirement that ATSI notify the USFWS if any new nest were identified during construction. The USFWS concurred with the request on April 19, 2022 and requested for ATSI to follow back up with the agency after the end of Summer 2022 to confirm if there are new nest within the corridor of the Project. Accordingly, on September 1, 2022, AECOM requested confirmation from the USFWS as to whether any new nests were located within the Project corridor; USFWS' response, dated September 21, 2022, indicated its prior response (dated December 30, 2019) remained current (no new bald eagle nests have been located within the Project corridor). Correspondence regarding bald eagle nest locations is provided as Exhibit 13.

Finally, the USFWS requested that a presence/absence survey to be completed for the eastern prairie fringed orchid within the proposed work limits of the Project. AECOM completed the presence/absence survey between June 29 and July 1, 2021, and February 23, 2022, finding that no populations of the eastern prairie fringed orchid were observed within the Project work areas and compiling results in the *Presence/Absence Survey Report, Easter Prairie Fringed Orchid* (September 2022) (Exhibit 14). The survey report was provided to the USFWS, and the USFWS concurrence is provided as Exhibit 15.

4906-6-05 (B)(10)(f): Areas of Ecological Concern

AECOM consulted with the ODNR and the USFWS for the presence of any unique ecological sites, geological features, animal assemblages, scenic rivers, state wildlife areas, nature preserves, parks or forests, national wildlife refuges, or other protected natural areas within one (1) mile of the Project area. The ODNR's response on February 5, 2020, listed the Little Portage Wildlife Area (ODNR, DOW) and Port Clinton Lakeshore Preserve (City of Port Clinton) within a one (1) mile radius of the Project area. Neither the Little Portage Wildlife Area nor the Port Clinton Lakeshore Preserve are located within the Project corridor, however. A copy of ODNR's response is included as Exhibit 9.

AECOM also conducted a wetland delineation and stream assessment report of the Project (See Exhibit 16). During the reconductoring of the transmission line, ATSI plans to replace and/or modify eleven (11) existing structures that will require temporary equipment access. All other modifications and work will be done by foot or by helicopter within ATSI's existing rights. AECOM conducted the wetland and stream delineation on January 14-20, October 20, and November 17-18 in 2020; on November 11, 2021; and on February 23, 2022. The survey boundary included a 150-foot-wide corridor encompassing the 100-foot-wide right-of-way (ROW) centered along the 7.6 miles of transmission line, a 50-foot-wide survey corridor centered along proposed temporary access roads, and a 25-foot-wide offset of all ancillary work areas. A copy of the wetland and stream delineation is provided as Exhibit 16.

During the survey, nine types of wetlands and wetland complexes were identified within the AECOM survey boundary, which included 30 PEM wetlands, two PSS wetlands, two PUB wetlands, one PEM/PSS wetland complex, one PEM/PFO wetland complex, one PEM/PSS/PUB wetland complex, one PEM/PFO/PUB wetland complex, two PEM/PSS/PFO wetland complexes, and one PEM/PSS/PFO/PUB wetland complex. Of these, 34 wetland complexes were identified as Ohio Rapid Assessment Method (ORAM) Category 1 wetlands, five were identified as ORAM Modified Category 2 wetlands, and two were identified as ORAM Modified Category 3 wetlands. Categories were based on the Ohio Environmental Protection Agency (OEPA) ORAM scores, which were scored on a variety of factors such as size, surrounding land use, disturbance, invasive species, and vegetation growth.

The 13 streams identified within the AECOM survey boundary included 12 perennial streams and one intermittent stream. Ten streams were assessed using the HHEI methodology; all ten streams were identified as Modified Class 2 Streams. Three streams were assessed using the QHEI methodology and two were classified as Poor Streams and one as a Very Poor Stream.

ATSI intends to utilize temporary timber mat bridges or equivalent to be installed above the ordinary high-water mark (OHWM) for all equipment crossings of streams to avoid in-water work. However, one perennial stream (Stream LG-01) requires a replacement of the existing culvert. Additionally, ATSI intends to utilize best management practices to avoid other indirect impacts to streams and wetlands through use of erosion and sediment controls as well as using either low ground pressure equipment and/or timber matting for wetland crossings. Of the eleven (11) structures proposed for modification and/or replacement that require construction access, only one replacement structure (Structure 1398) is proposed with a concrete foundation being placed within a PEM wetland (Wetland LO-13a). As a result of the culvert replacement in Stream LG-01 and concrete foundation within Wetland LO-13a, ATSI is seeking authorization from the United States Army Corp of Engineers (USACE) under a Pre-Construction Notification (PCN) Nationwide Permit 57. All other wetland and/or stream crossings are compliant with non-reporting conditions of the PCN Nationwide Permit 57 and ATSI will provide the permit authorization upon receipt.

Additionally, a review of the online FEMA Flood Insurance Rate Mapping was performed. Some Project work limits may be located within a regulated floodplain area. (See Exhibit 17.) Consultation with Ottawa County's and City of Port Clinton's floodplain managers will be required for a floodplain development review for access roads within this area.

A review of the National Conservation Easement Database revealed no conservation easements in the Project Area. (www.conservationeasement.us)

4906-6-05(B)(10)(g): Other Information

Construction and operation of the proposed Project will be in accordance with the requirements specified in the latest revision of the NESC as adopted by the PUCO and will

meet all applicable safety standards established by the Occupational Safety and Health Administration.

No other or unusual conditions are expected that will result in significant environmental, social, health or safety impacts.

4906-6-07: Documentation of Letter of Notification Transmittal and Availability for Public Review

This Letter of Notification application is being provided concurrently to the following officials for the City of Port Clinton, Portage Township, Bay Township, and Salem Township Ottawa County, Ohio.

Ottawa County

Mr. Mark Stahl
Ottawa County Commissioner
315 Madison St.
Port Clinton, OH 43452

Mr. Mark Messa, Director
Ottawa County Regional Planning
Commission
315 Madison St.
Port Clinton, OH 43452

Mr. Mark Coppeler
Ottawa County Commissioner
315 Madison St.
Port Clinton, OH 4345

Mr. Ronald Lajti, Jr.
Ottawa County Engineer
8247 W State Route 163
Oak Harbor, OH 43449

Mr. Don Douglas
Ottawa County Commissioner
315 Madison St.
Port Clinton, OH 43452

Mr. Mike Libben
Ottawa County Soil & Water
240 West Lake Street
Oak Harbor, OH 43449

Port Clinton

Mayor Michael Snider
City of Port Clinton
1868 E. Perry St.
Port Clinton, OH 43452

Ms. Lisa Sarty
President of Council
1868 E. Perry St.
Port Clinton, OH 43452

Mr. Gabe Below
City Auditor
1868 E. Perry St.
Port Clinton, OH 43452

Mr. Tracy Colston
Port Clinton Safety Service Director
1868 E. Perry Street
Port Clinton, OH 43452

Portage Township

Ms. Molly B Sass
Portage Township Trustee
1398 S. Fulton St
Port Clinton, OH 43452

Mr. Karl Kopchak
Portage Township Trustee
1398 S. Fulton St
Port Clinton, OH 43452

Mr. Keith Heileman
Portage Township Trustee
1398 S. Fulton St
Port Clinton, OH 43452

Ms. Judith Johannsen
Portage Township Fiscal Officer
1398 S. Fulton St
Port Clinton, OH 43452

Bay Township

Mr. Art Castillo
Bay Township Trustee
4471 W Fremont Road
Port Clinton, OH 43452

Mr. Denton Glovinsky
Bay Township Trustee
4471 W Fremont Road
Port Clinton, OH 43452

Mr. Benny Peterson
Bay Township Trustee
4471 W Fremont Road
Port Clinton, OH 43452

Ms. Bonnie Kaspar
Bay Township Fiscal Officer
4471 W Fremont Road
Port Clinton, OH 43452

Salem Township

Mr. Richard Lenke
Salem Township Trustee
P.O. Box 417
Oak Harbor, Ohio 43449

Mr. Randy Wilburn
Salem Township Trustee
P.O. Box 417
Oak Harbor, Ohio 43449

Mr. Todd Winke
Salem Township Trustee
P.O. Box 417
Oak Harbor, Ohio 43449

Mr. Aaron Avery
Salem Township Fiscal Officer
P.O. Box 417
Oak Harbor, Ohio 43449

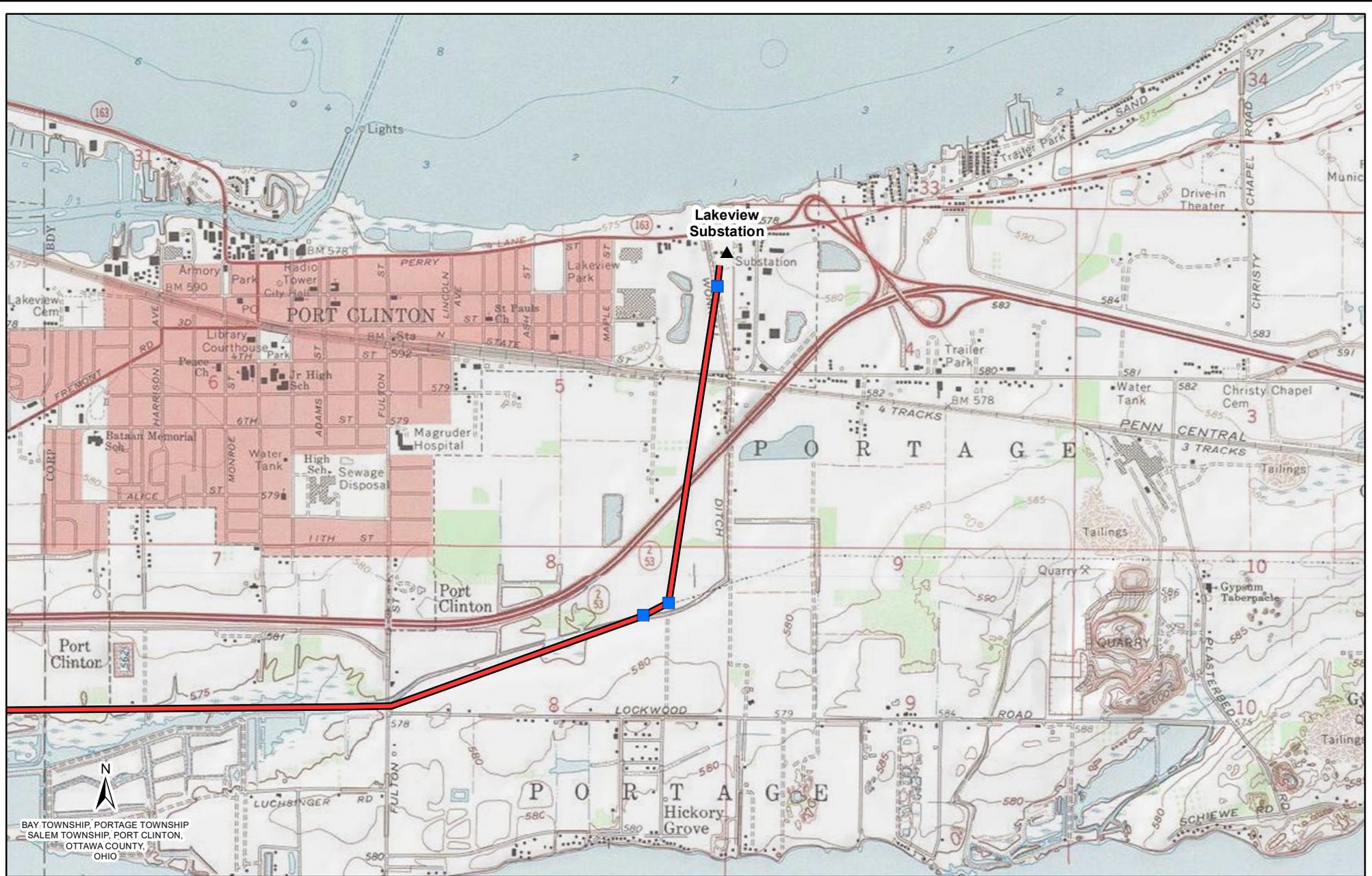
Ottawa County Library

Ms. Lina Hall, Director
Oak Harbor Public Library
147 W. Main St
Oak Harbor, OH 43449

Exemplar copies of the transmittal letters to these public officials and library served in accordance with OAC Rule 4906-6-07 are enclosed herewith as proof of compliance with OAC Rule 4906-6-07(B).

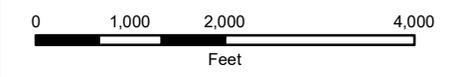
Information is posted on www.firstenergycorp.com/about/transmission_project/ohio.html on how to request an electronic or paper copy of this Letter of Notification application. The link to website is being provided to meet the requirement of OAC Rule 4906-6-07(B) and to provide the OPSB with proof of compliance with the notice requirements in OAC Rule 4906-6-07(A)(3).

EXHIBIT #1



BAY TOWNSHIP, PORTAGE TOWNSHIP
 SALEM TOWNSHIP, PORT CLINTON,
 OTTAWA COUNTY,
 OHIO

- LEGEND:**
- ▲ Substation
 - Structure Replacements
 - Re-Conductor Section of Lakeview-Ottawa 138 kV Transmission Line
 - Lakeview-Ottawa 138 kV Transmission Line



Reference:
 USGS Topographical Overlay

Coordinate System:
 NAD 1983 StatePlane Ohio North FIPS 3401 Feet
 Projection: Lambert Conformal Conic; Units: Foot US

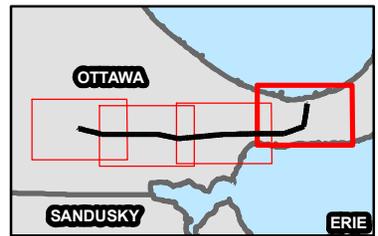


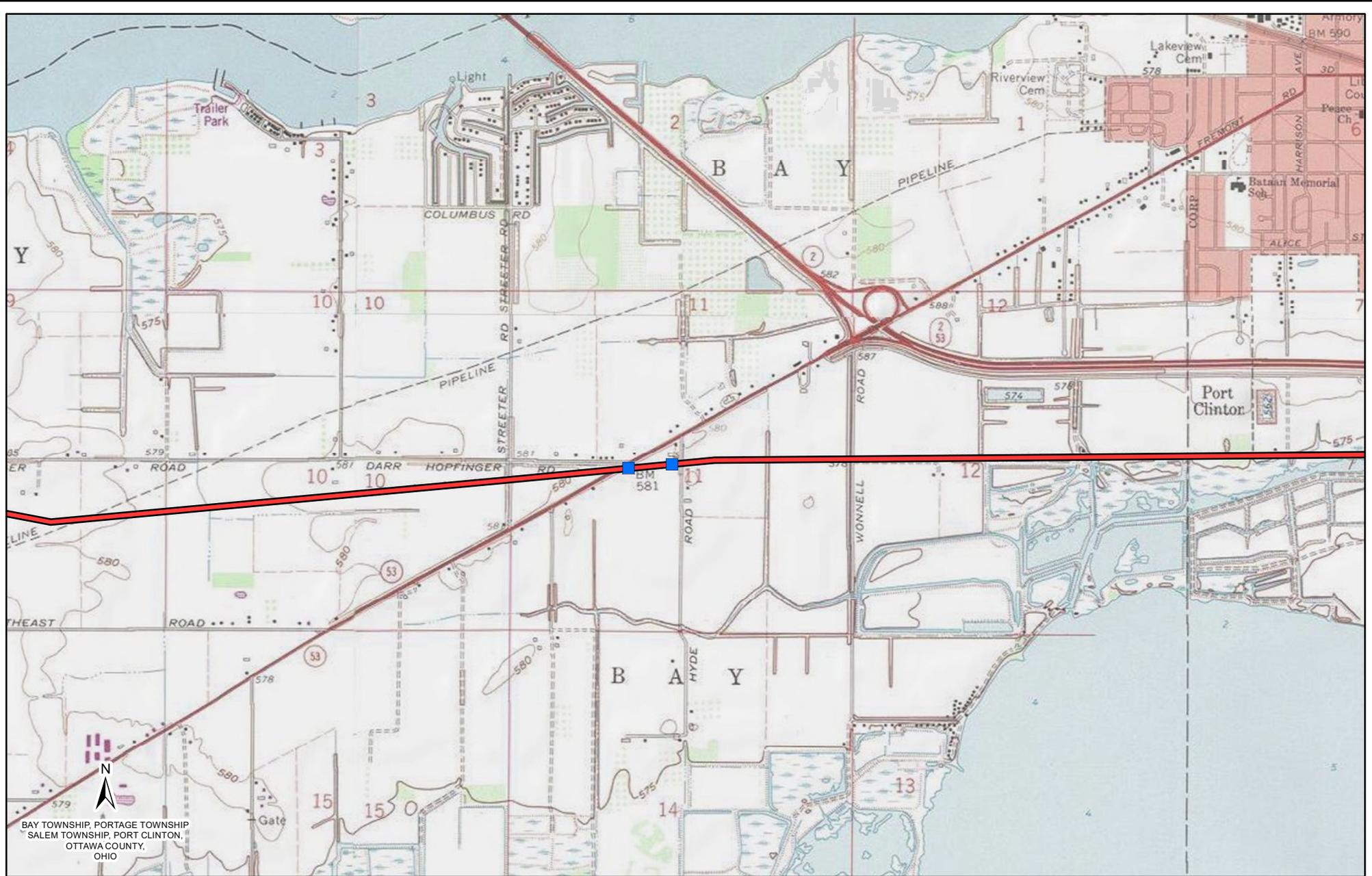
EXHIBIT 1

Lakeview-Ottawa 138 kV Transmission Line Re-conductor Project



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LEGEND:

- ▲ Substation
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- Lakeview-Ottawa 138 kV Transmission Line

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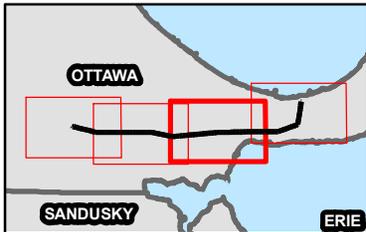


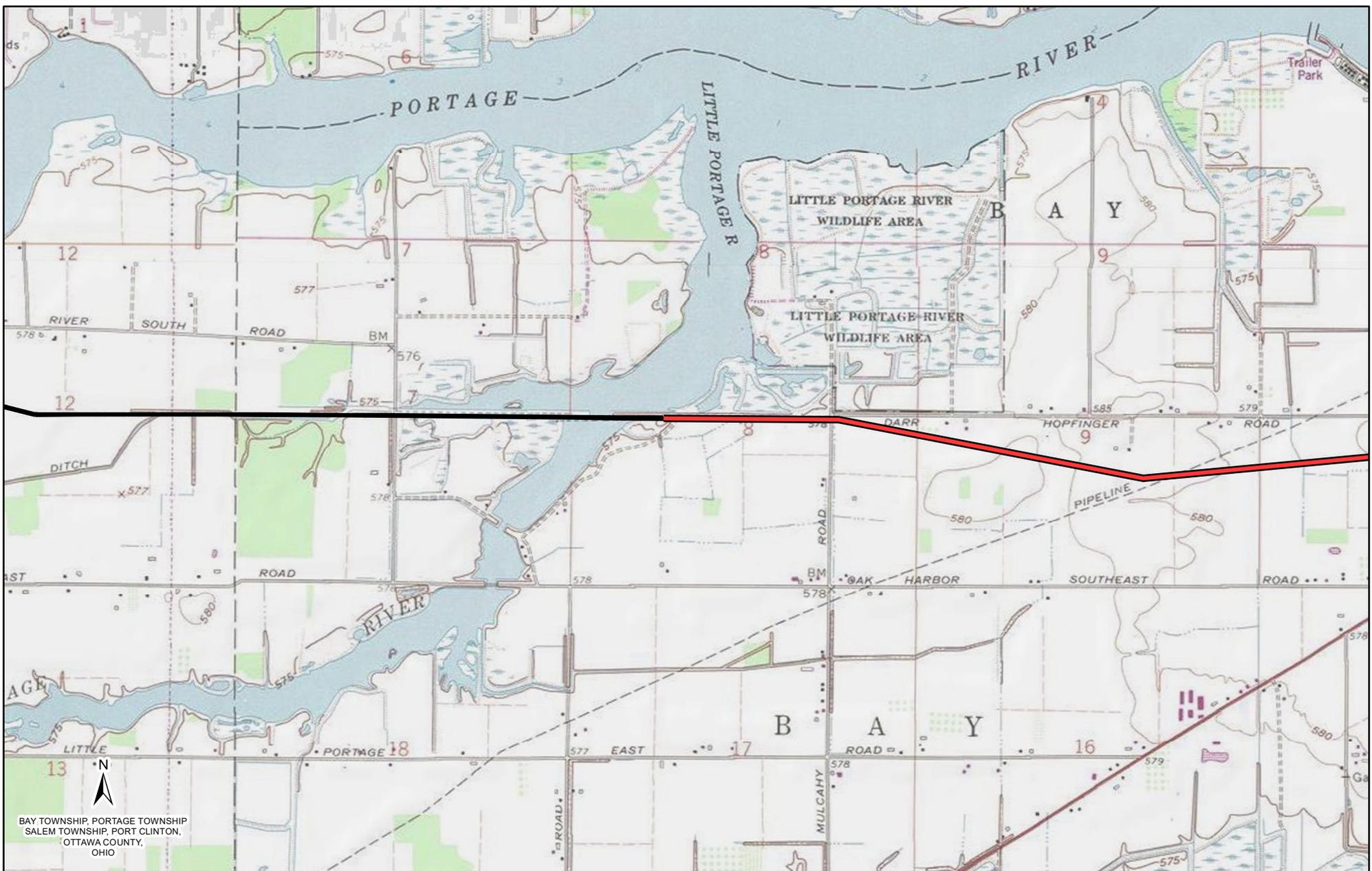
EXHIBIT 1

Lakeview-Ottawa 138 kV Transmission Line Re-conductor Project



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BAY TOWNSHIP, PORTAGE TOWNSHIP
SALEM TOWNSHIP, PORT CLINTON,
OTTAWA COUNTY,
OHIO

LEGEND:

- ▲ Substation
- Structure Replacements
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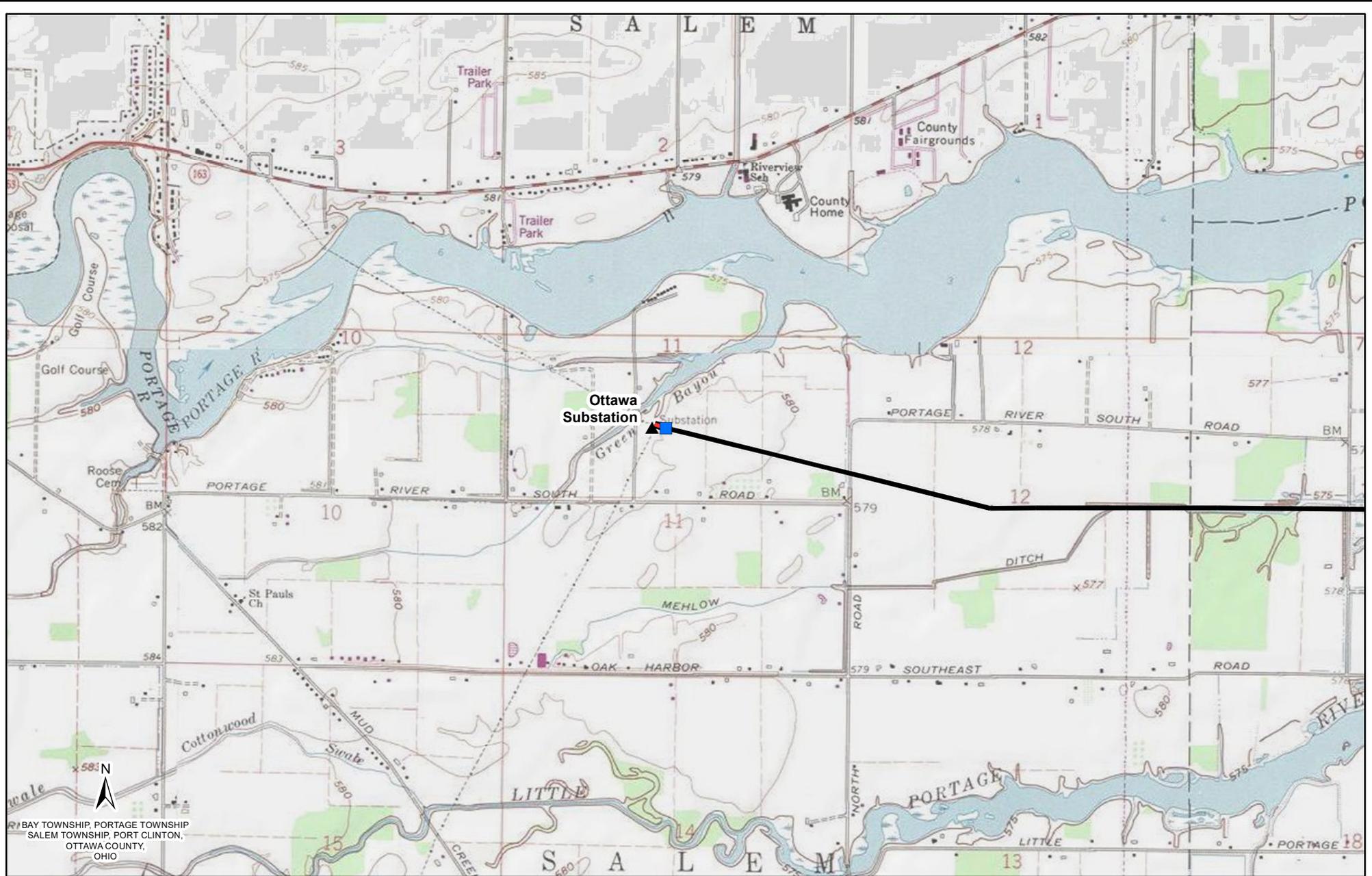
EXHIBIT 1

Lakeview-Ottawa 138 kV Transmission Line Reconductor Project



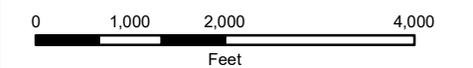
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BAY TOWNSHIP, PORTAGE TOWNSHIP
SALEM TOWNSHIP, PORT CLINTON,
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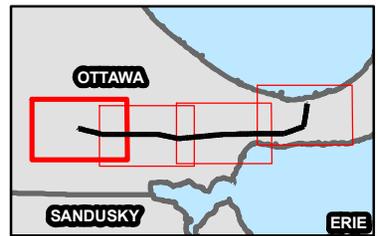


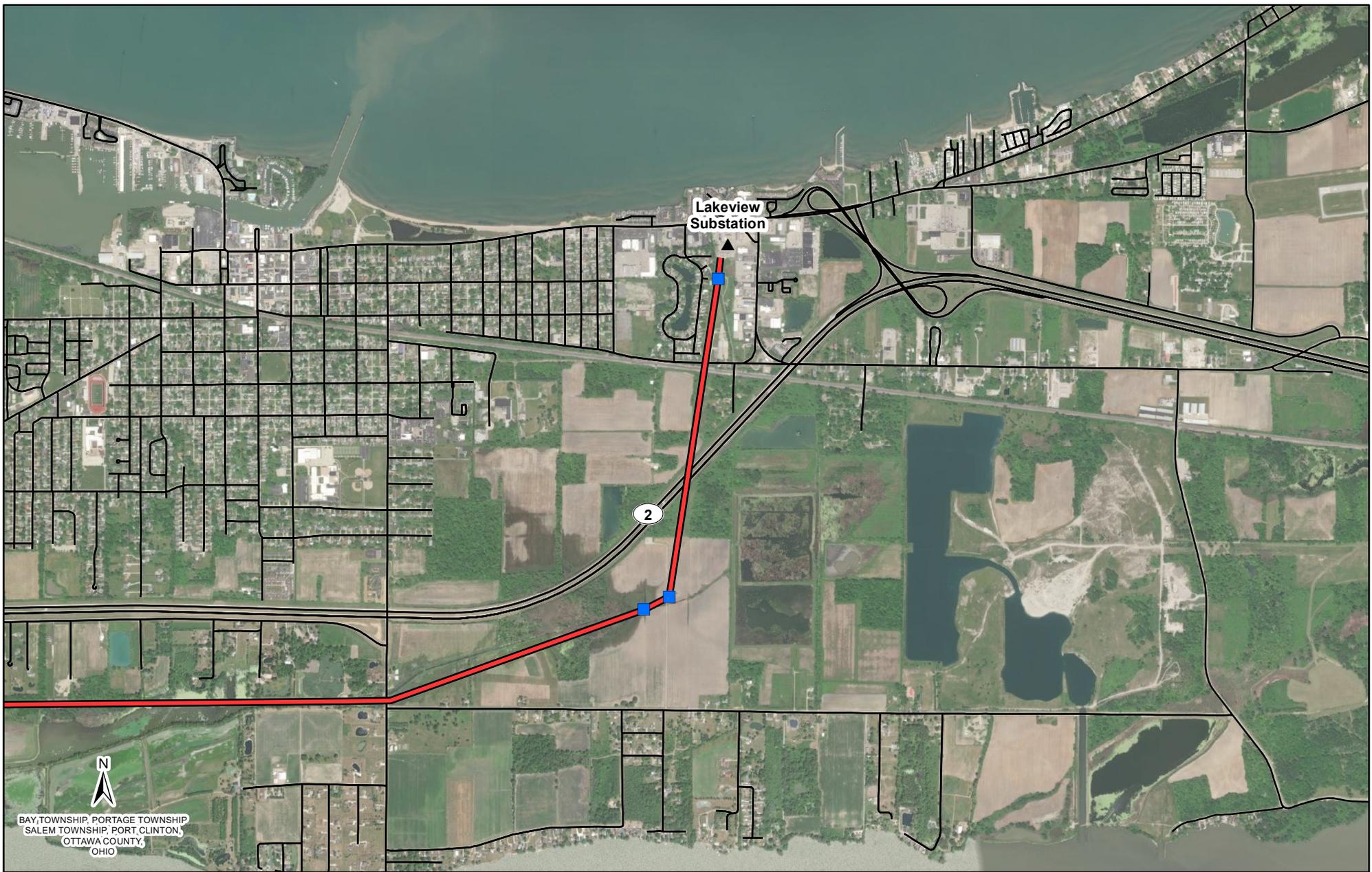
EXHIBIT 1



ATSI
American Transmission Systems, Inc.
a subsidiary of FirstEnergy Corp.

**Lakeview-Ottawa 138 kV
Transmission Line Reconductor Project**

EXHIBIT #2



BAY TOWNSHIP, PORTAGE TOWNSHIP
SALEM TOWNSHIP, PORT CLINTON,
OTTAWA COUNTY,
OHIO

LEGEND:

- ▲ Substation
- Structure Replacements
- Re-Conductor Section of Lakeview-Ottawa 138 kV Transmission Line
- Lakeview-Ottawa 138 kV Transmission Line
- Roads

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Reference:
ESRI Aerial Imagery

Coordinate System:
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Projection: Lambert Conformal Conic; Units: Foot US

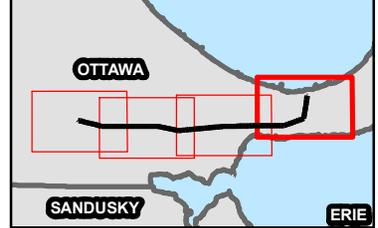


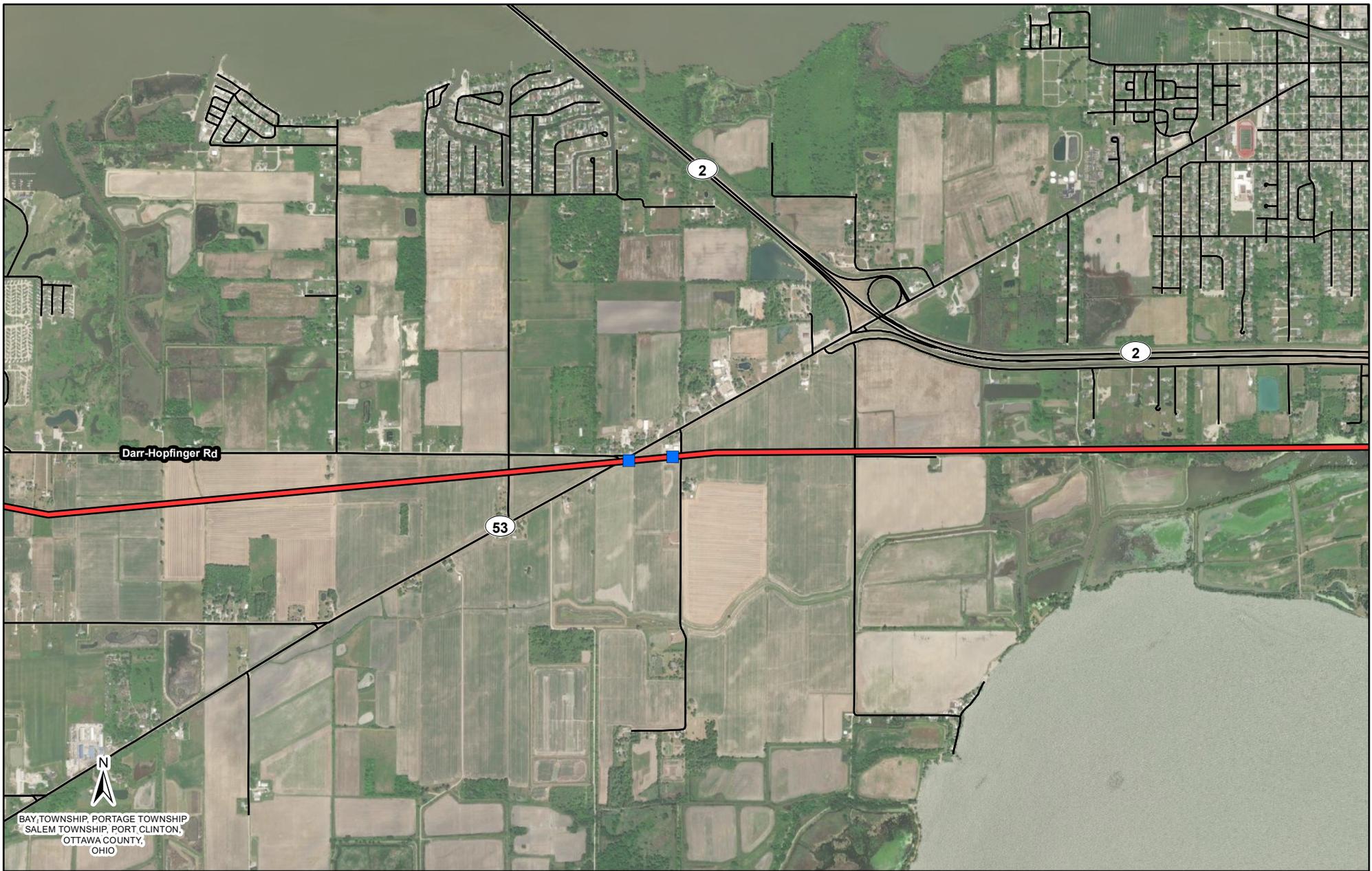
EXHIBIT 2

Lakeview-Ottawa 138 kV Transmission Line Re-conductor Project



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American Transmission Systems, Inc.
a subsidiary of FirstEnergy Corp.

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BAY TOWNSHIP, PORTAGE TOWNSHIP,
SALEM TOWNSHIP, PORT CLINTON,
OTTAWA COUNTY,
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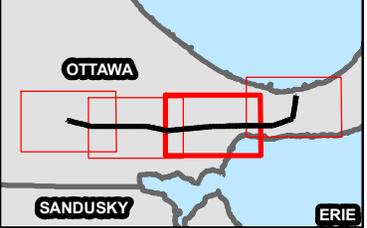


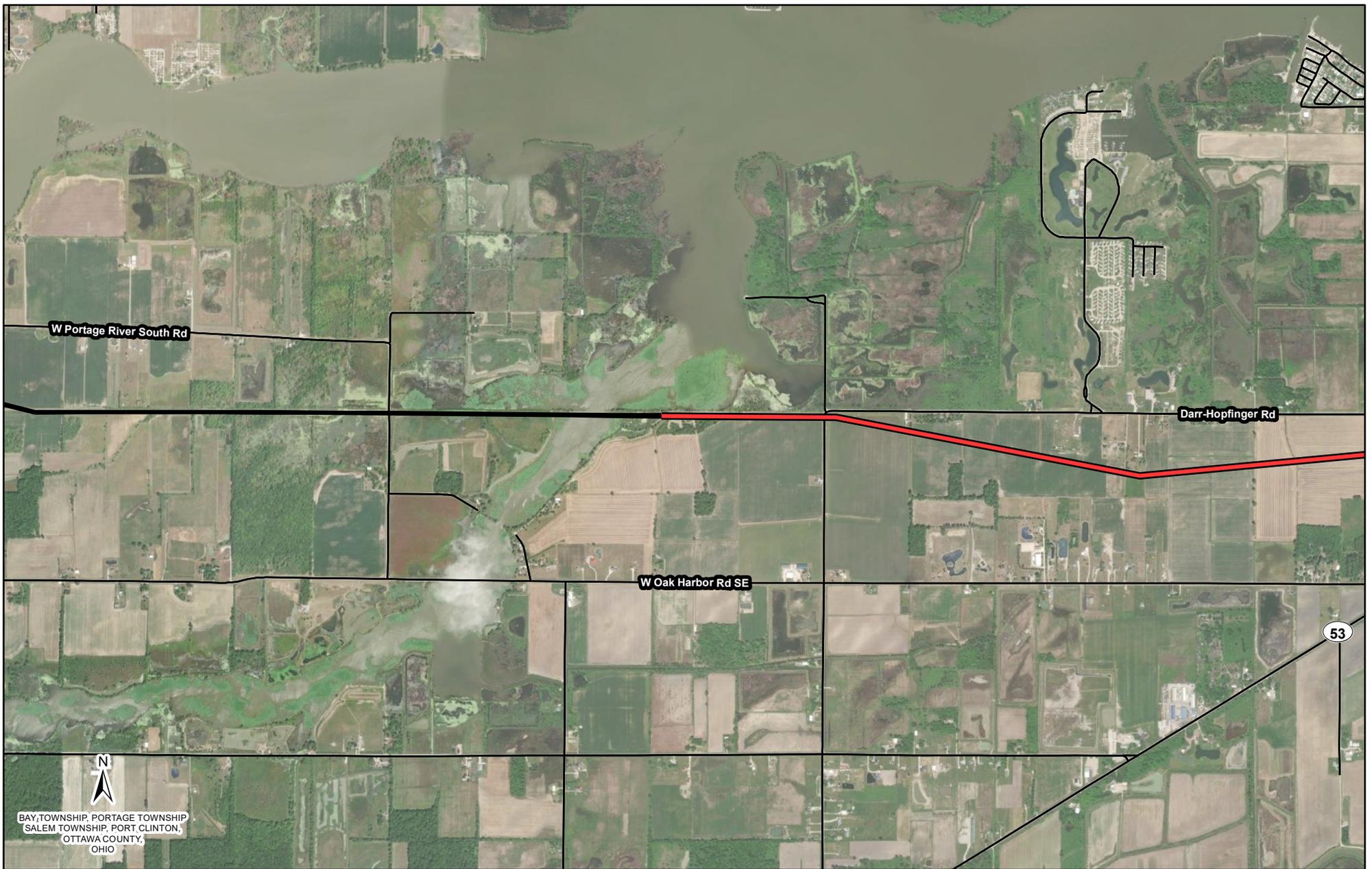
EXHIBIT 2

Lakeview-Ottawa 138 kV Transmission Line Re-conductor Project



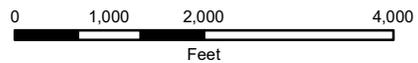
ATSI
American Transmission Systems, Inc.
a subsidiary of FirstEnergy Corp.

Page 2 of 4



LEGEND:

- ▲ Substation
- Structure Replacements
- Re-Conductor Section of Lakeview-Ottawa 138 kV Transmission Line
- Lakeview-Ottawa 138 kV Transmission Line
- Roads



Reference:
ESRI Aerial Imagery

Coordinate System:
NAD 1983 StatePlane Ohio North FIPS 3401 Feet
Projection: Lambert Conformal Conic; Units: Foot US

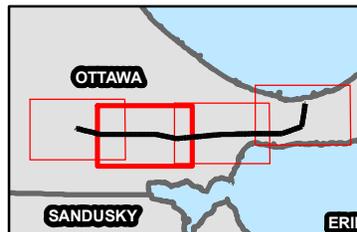
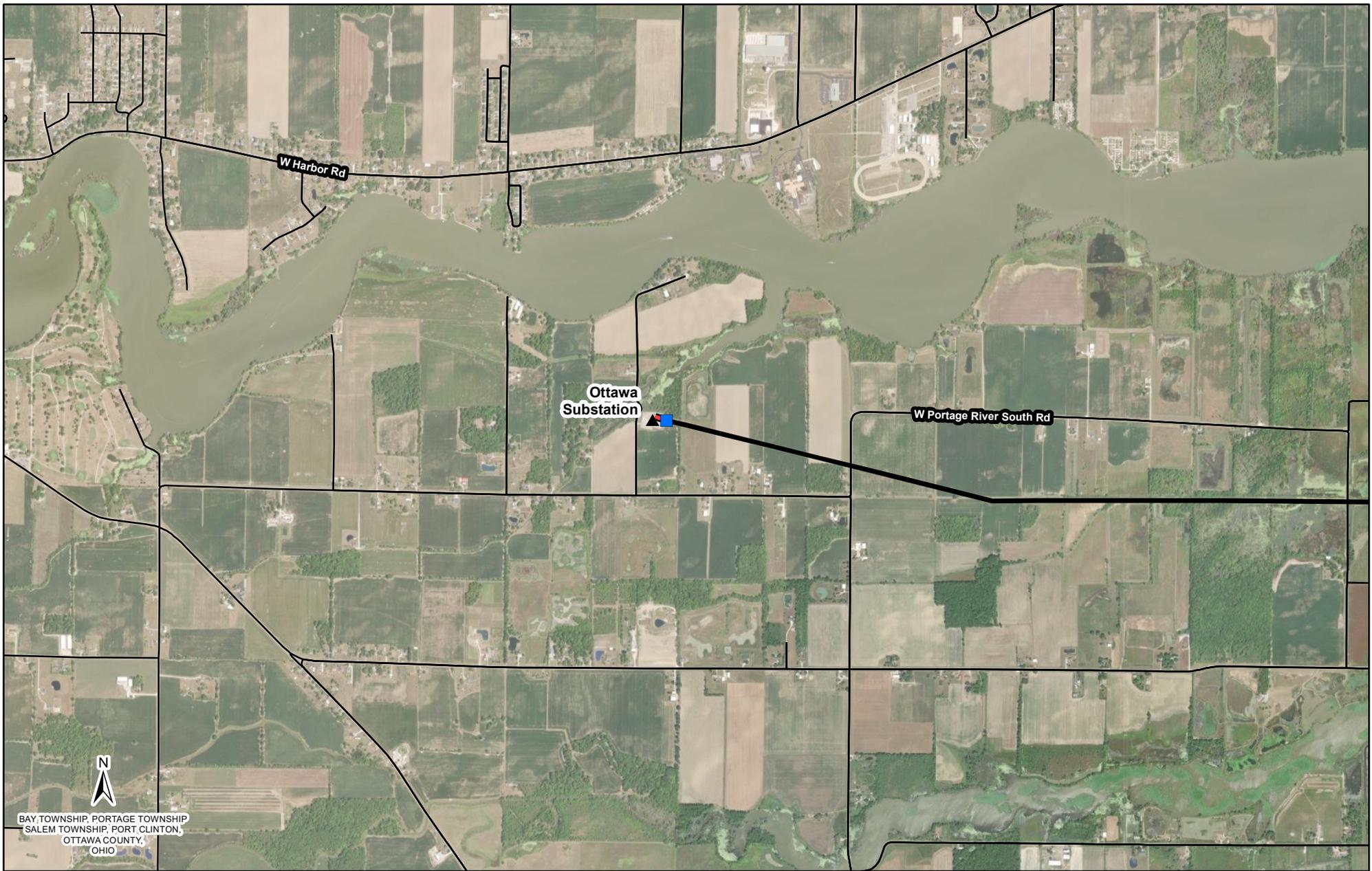


EXHIBIT 2



**Lakeview-Ottawa 138 kV
Transmission Line Re-conductor Project**



LEGEND:

- ▲ Substation
- Structure Replacements
- Re-Conductor Section of Lakeview-Ottawa 138 kV Transmission Line
- Lakeview-Ottawa 138 kV Transmission Line
- Roads

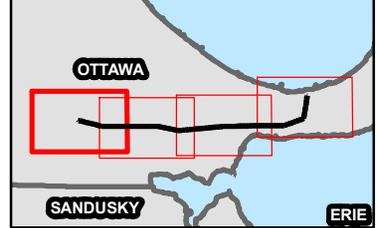
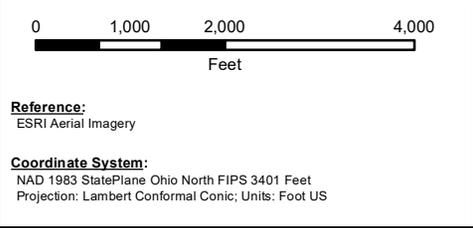


EXHIBIT 2	 <small>American Transmission Systems, Inc. a subsidiary of FirstEnergy Corp.</small>
Lakeview-Ottawa 138 kV Transmission Line Reconductor Project	
Page 4 of 4	

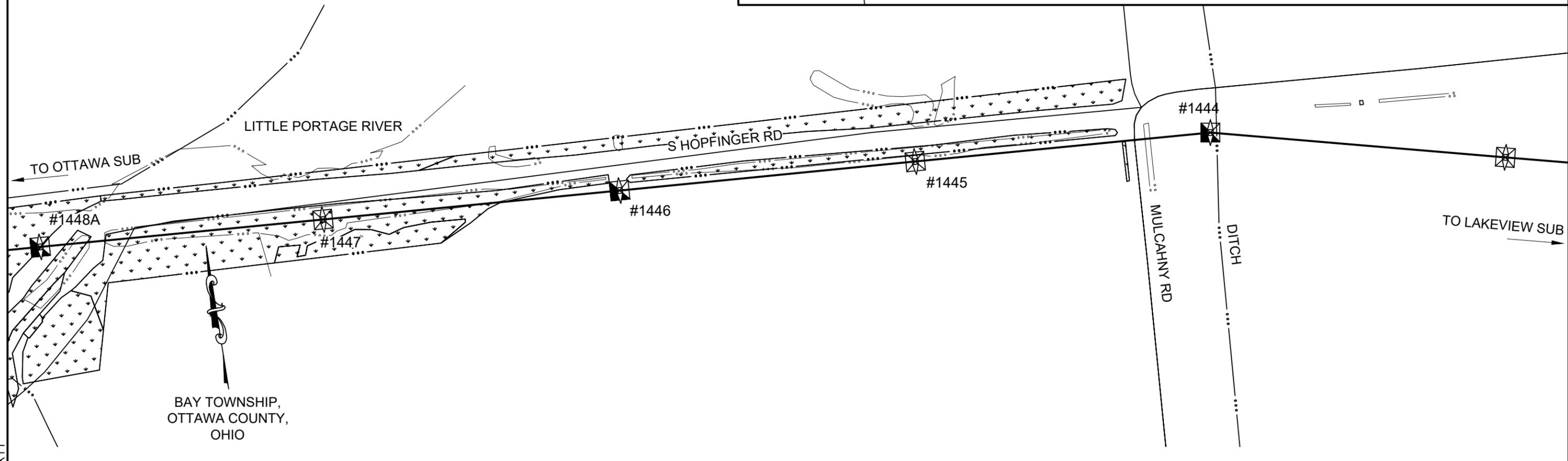
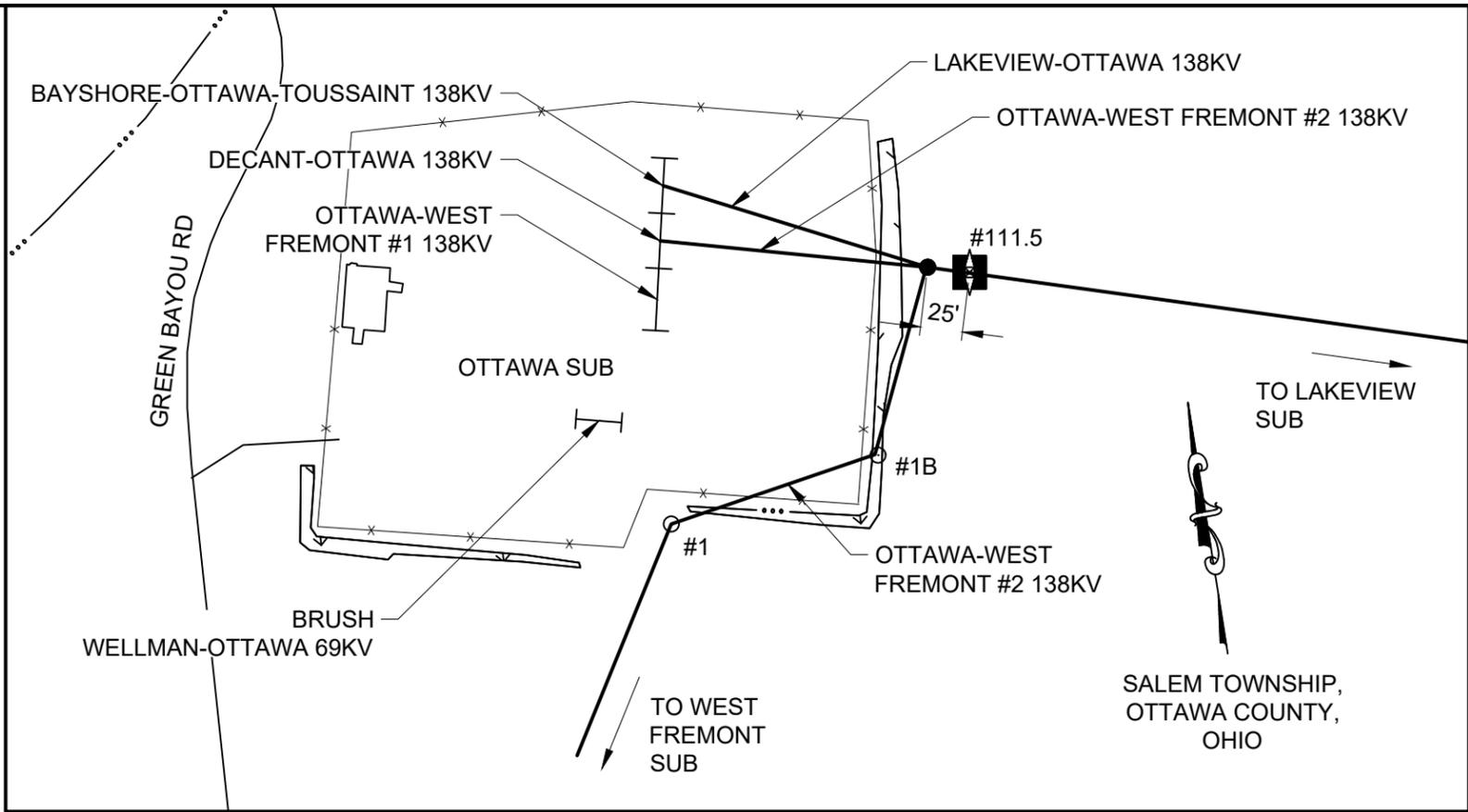
EXHIBIT #3

SCOPE OF WORK:

RECONDUCTOR THE LAKEVIEW-OTTAWA 138KV CIRCUIT FROM THE LAKEVIEW SUBSTATION TO STRUCTURE #1448A AND FROM THE OTTAWA SUBSTATION TO STRUCTURE #111.5. ALL EXISTING WIRES WILL BE REPLACED. STRUCTURES #1467, #1461, #1398, #1423, #1424, #111.5 WILL BE REPLACED.

LEGEND

- - NEW OR REPLACED STRUCTURE
- - EXISTING STRUCTURE TO REMAIN
- |—|—| - SUBSTATION FRAME
- ⊗ - EXISTING LATTICE TOWER TO REMAIN
- ⊗ (with diagonal lines) - EXISTING LATTICE TOWER TO BE MODIFIED
- ⊗ (with horizontal lines) - EXISTING LATTICE TOWER TO BE REMOVED
- - WATER'S EDGE
- - 138KV TRANSMISSION LINE
- x-x- - SUBSTATION FENCE
- [Stippled Area] - WETLANDS



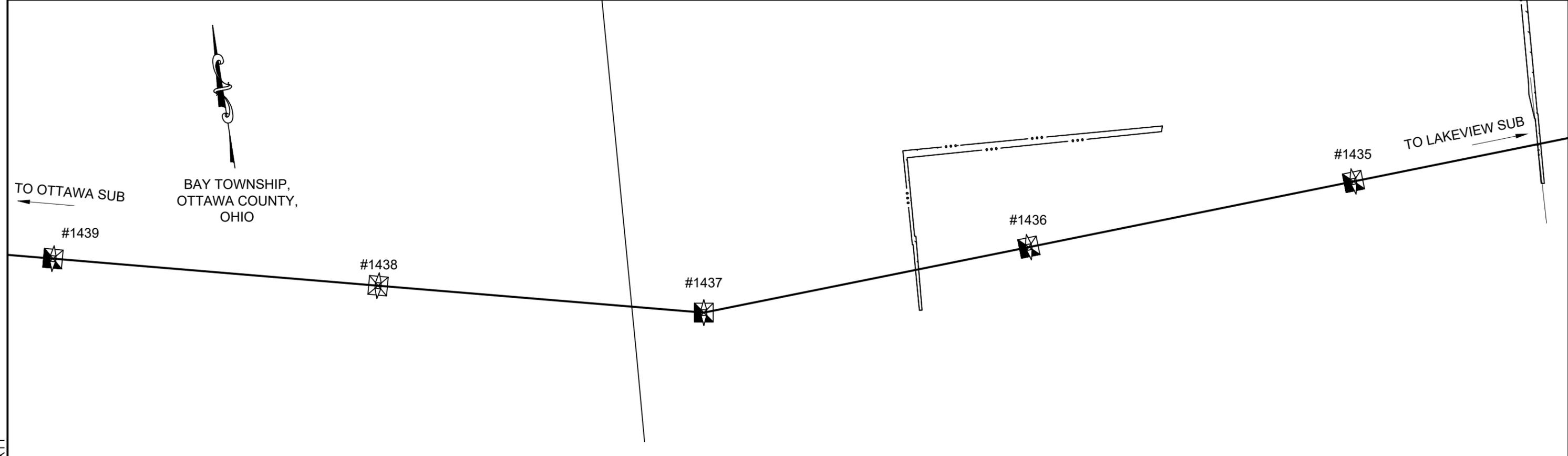
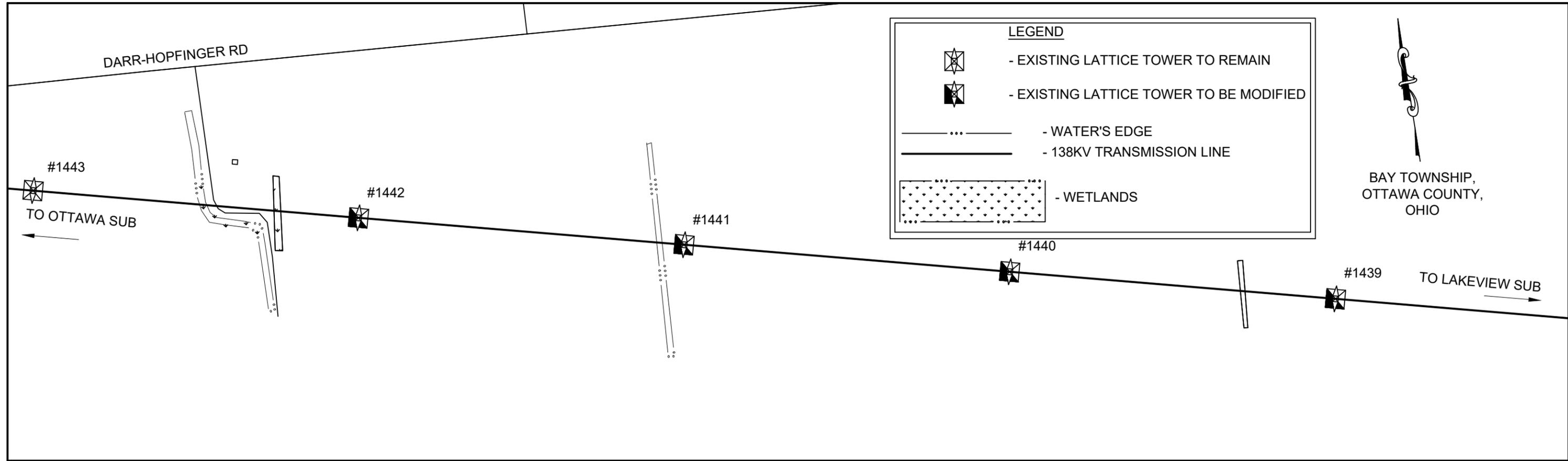
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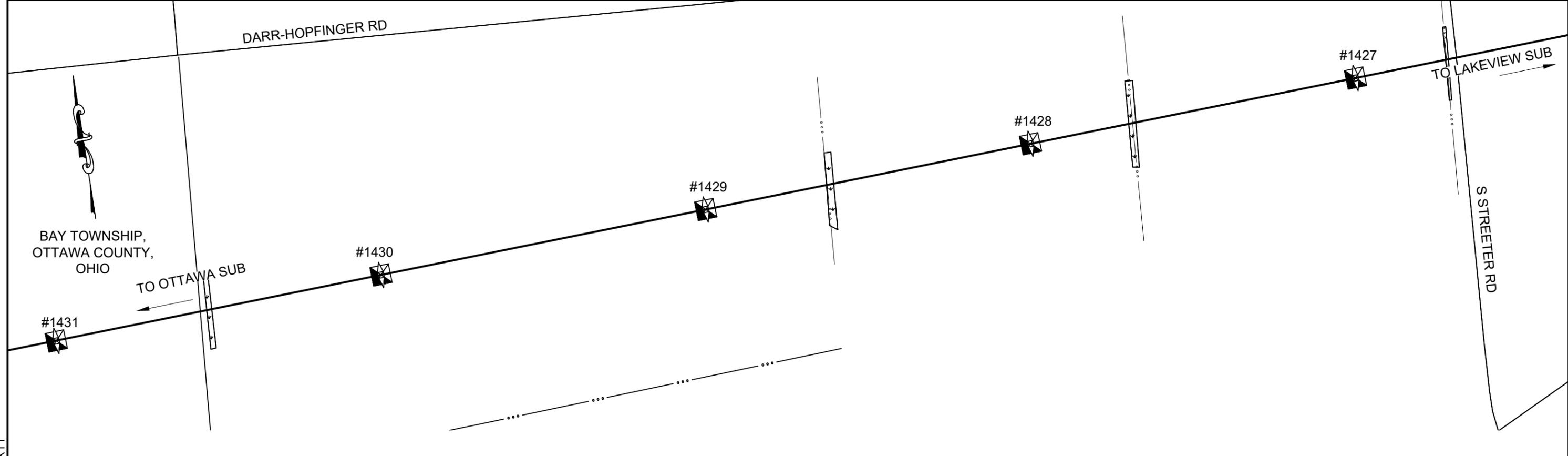
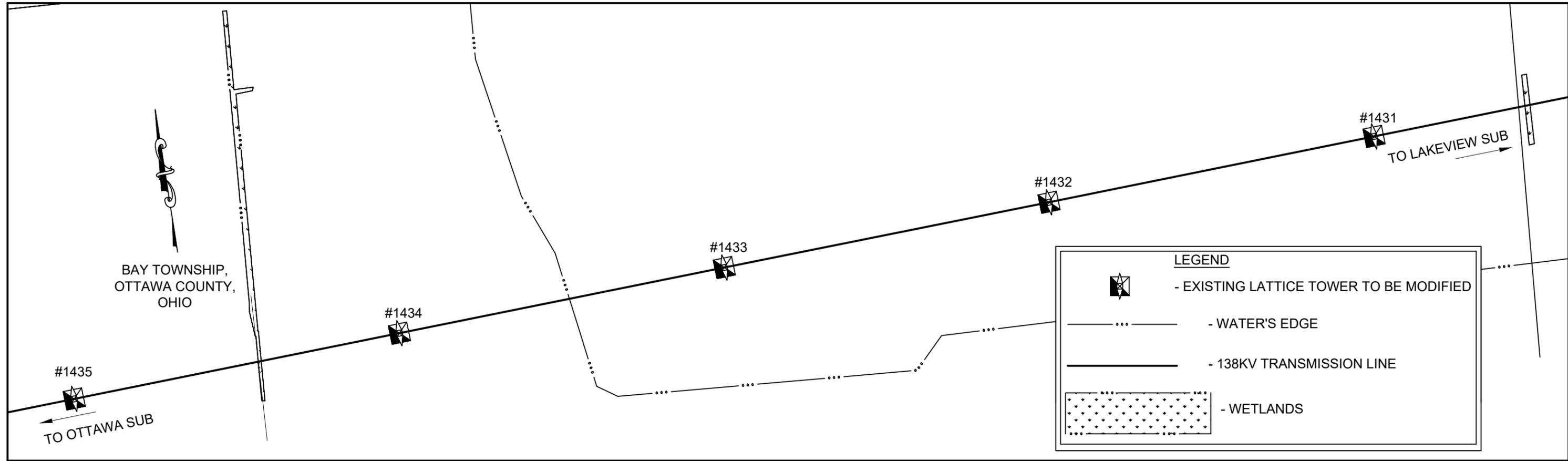
LAKEVIEW-OTTAWA 138KV RECONDUCTOR GENERAL LAYOUT

FirstEnergy Transmission Design	ASSET/OP. CO.	DWG NO.	SHEET	REV.
	ATSI/TE & OE	EXHIBIT 3	1/8	



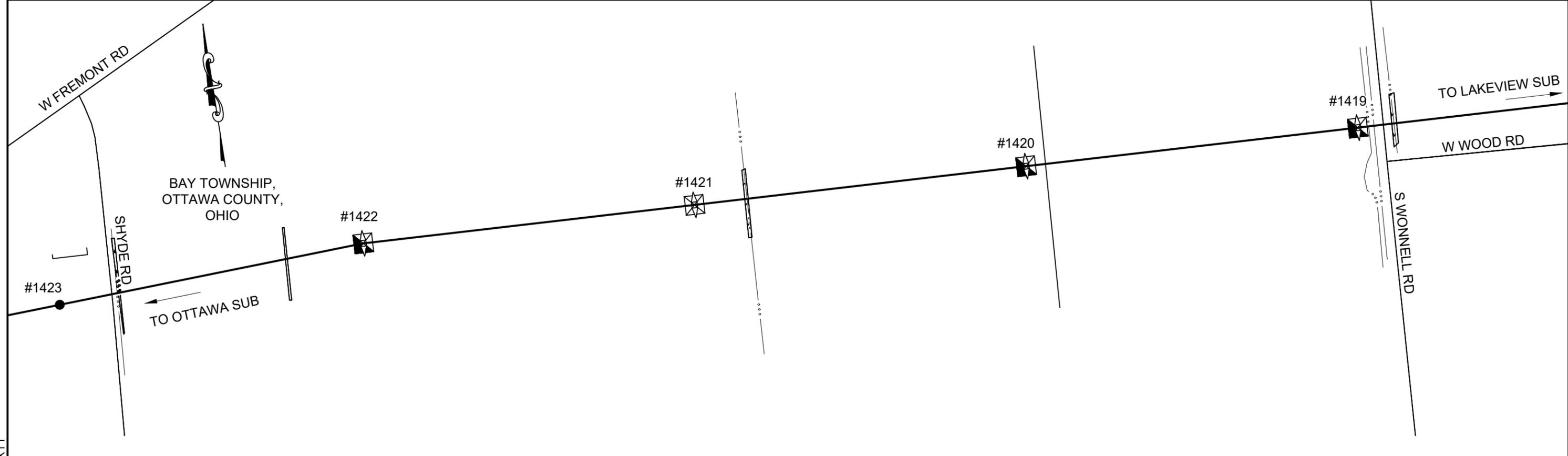
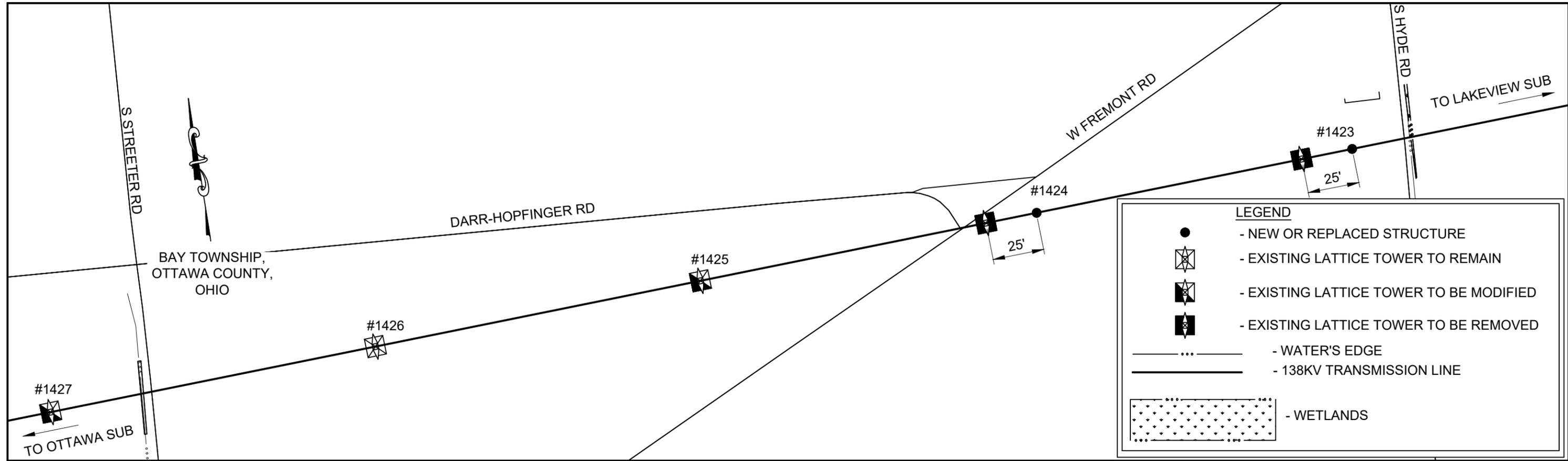
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PAPER SIZE: 17X11

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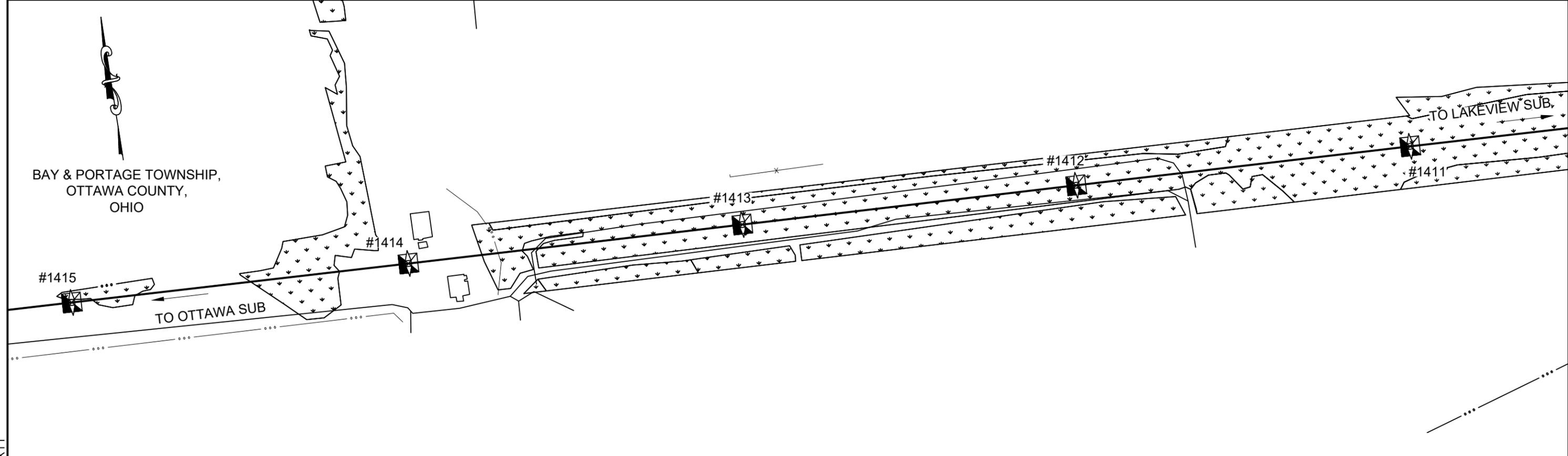
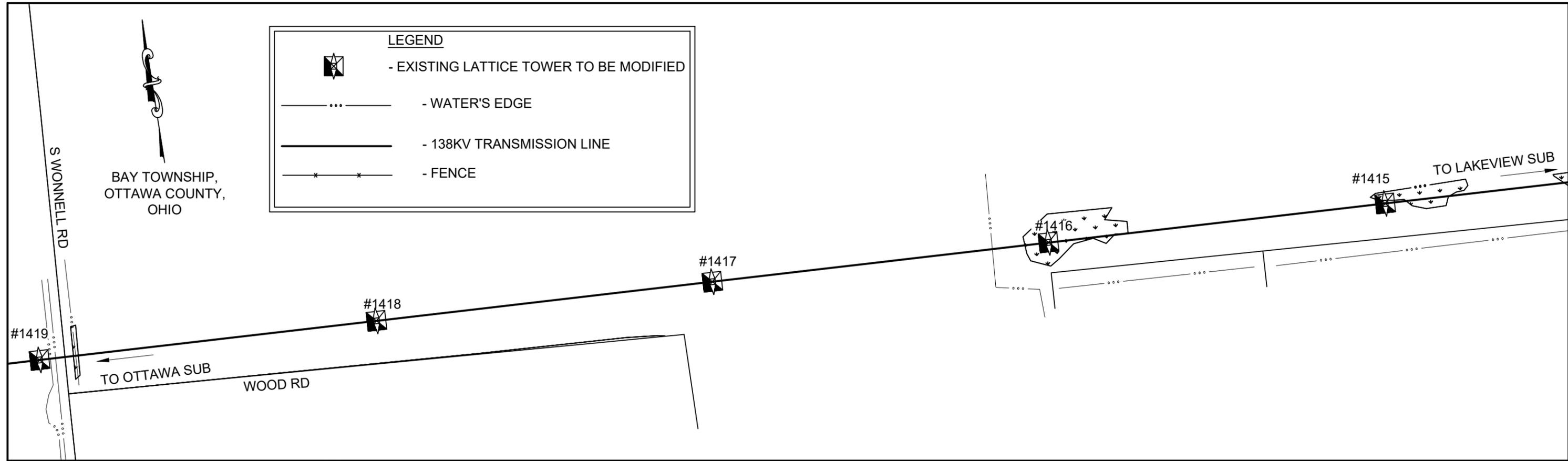


LEGEND

- - NEW OR REPLACED STRUCTURE
- ⊠ - EXISTING LATTICE TOWER TO REMAIN
- ⊠ - EXISTING LATTICE TOWER TO BE MODIFIED
- ⊠ - EXISTING LATTICE TOWER TO BE REMOVED
- - WATER'S EDGE
- - 138KV TRANSMISSION LINE
- [Pattern] - WETLANDS

PAPER SIZE: 17X11

DWG. NO.	REFERENCE	REV.	DATE	BY	APP.	DESCRIPTION	ISSUE DATE:	DR. VG/BV 8/22	C.E. 19-57-OE	LAKEVIEW-OTTAWA 138KV RECONDUCTOR GENERAL LAYOUT			
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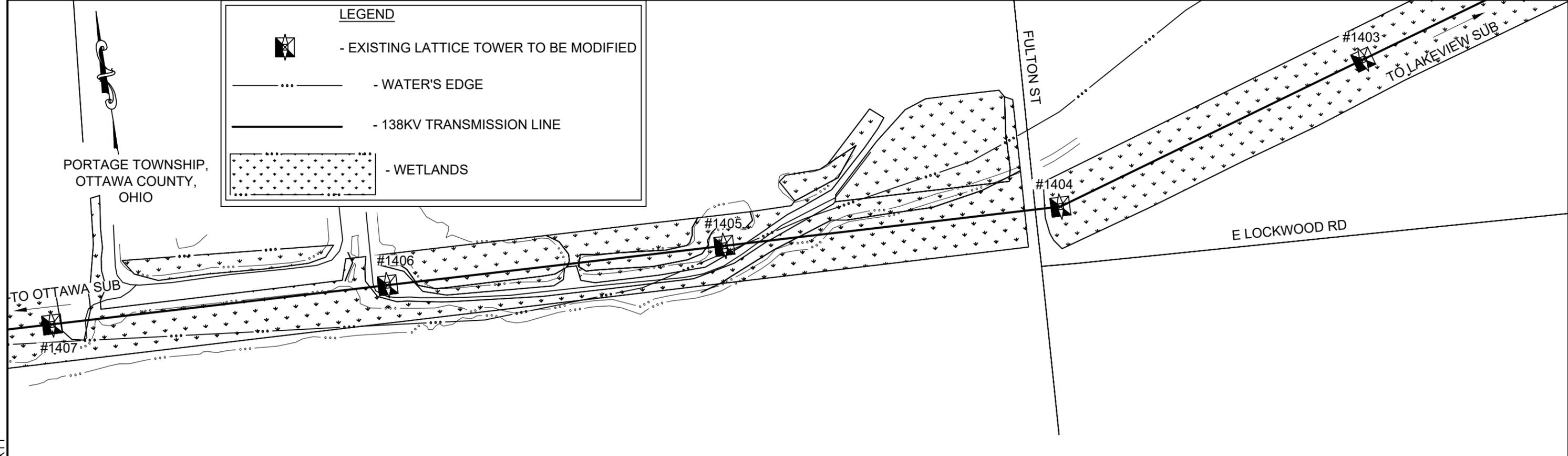
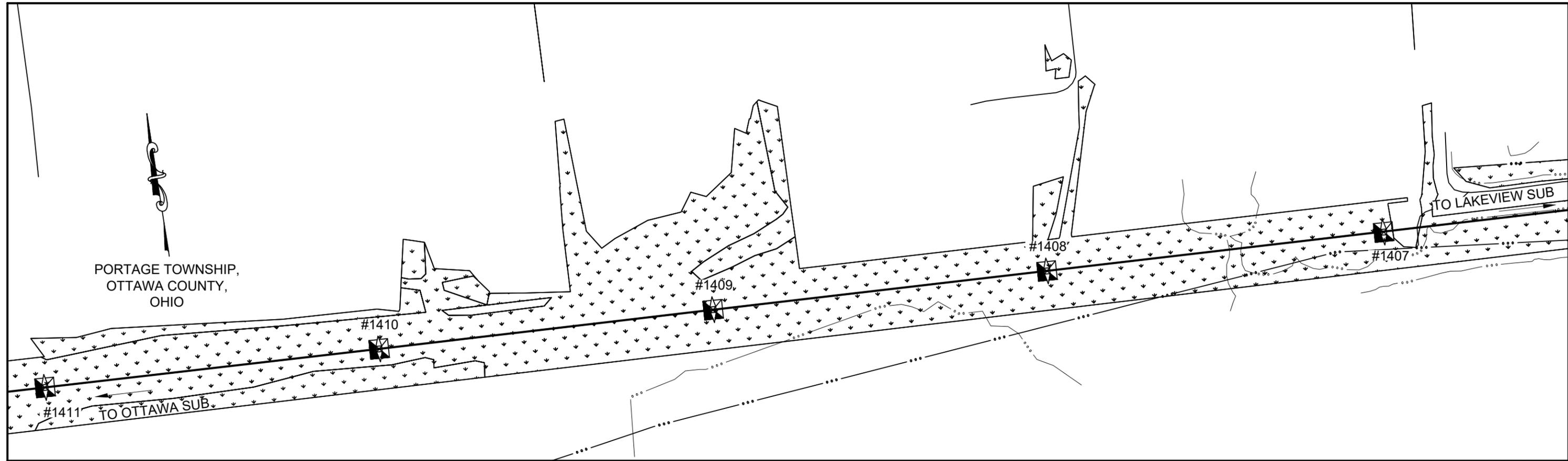


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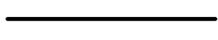
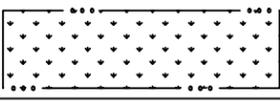
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LAKEVIEW-OTTAWA 138KV RECONDUCTOR GENERAL LAYOUT			
FirstEnergy <i>Transmission Design</i>	ASSET/OP. CO.	DWG NO.	SHEET REV.
	ATSI/TE & OE	EXHIBIT 3	5/8



LEGEND

-  - EXISTING LATTICE TOWER TO BE MODIFIED
-  - WATER'S EDGE
-  - 138KV TRANSMISSION LINE
-  - WETLANDS

PAPER SIZE: 17X11

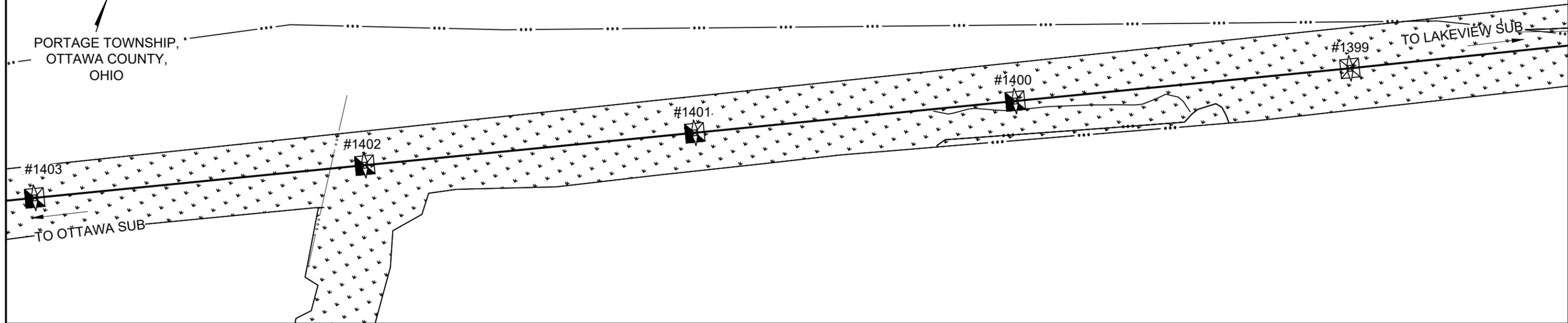
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ISSUE DATE:	DR. VG/BV	8/22	C.E. 19-57-OE
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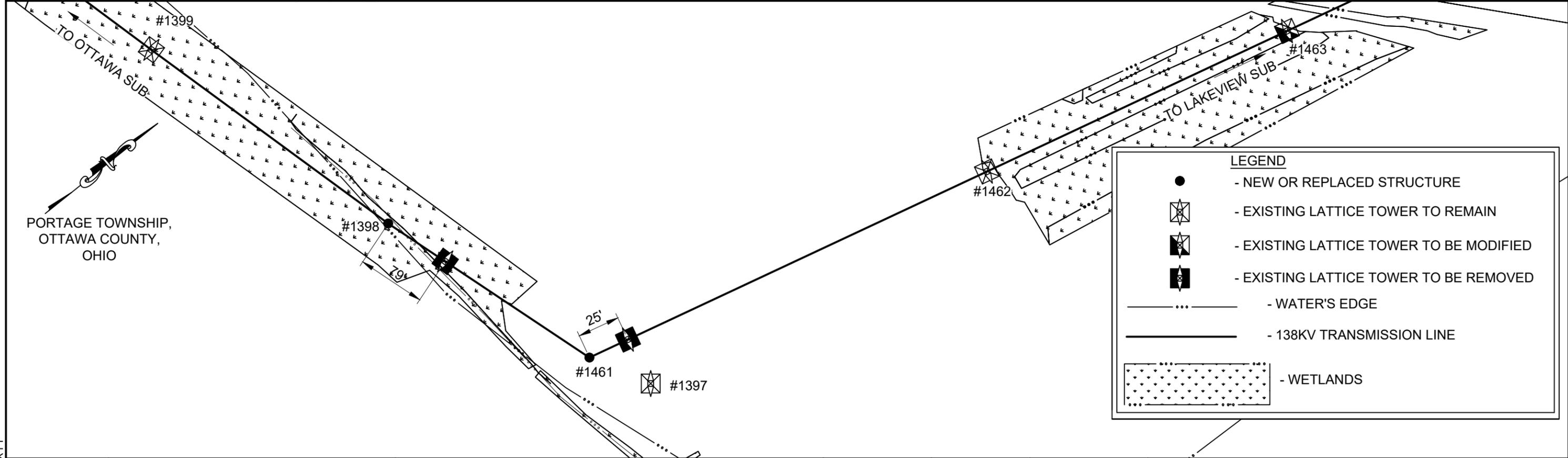
**LAKEVIEW-OTTAWA 138KV RECONDUCTOR
GENERAL LAYOUT**

	ASSET/OP. CO. ATSI/TE & OE	DWG NO. EXHIBIT 3	SHEET 6/8	REV.
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PORTAGE TOWNSHIP,
OTTAWA COUNTY,
OHIO



PORTAGE TOWNSHIP,
OTTAWA COUNTY,
OHIO



LEGEND

- NEW OR REPLACED STRUCTURE
- EXISTING LATTICE TOWER TO REMAIN
- EXISTING LATTICE TOWER TO BE MODIFIED
- EXISTING LATTICE TOWER TO BE REMOVED
- WATER'S EDGE
- 138KV TRANSMISSION LINE
- WETLANDS

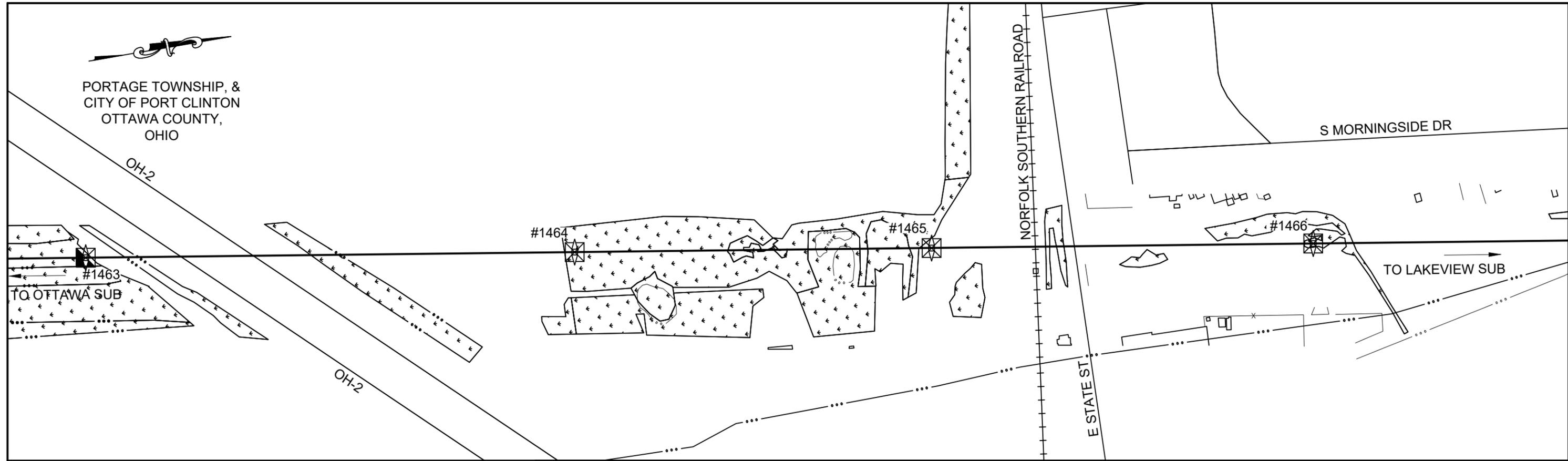
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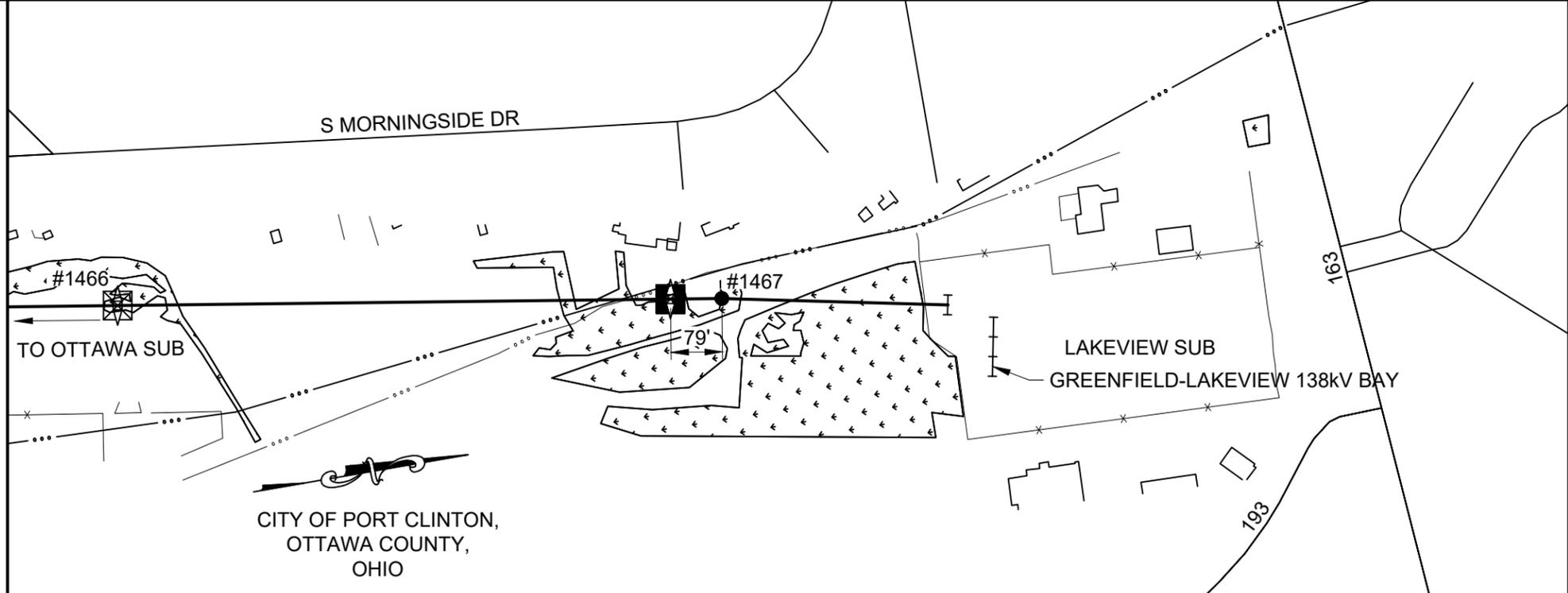
**LAKEVIEW-OTTAWA 138KV RECONDUCTOR
GENERAL LAYOUT**

	ASSET/OP. CO.	DWG NO.	SHEET	REV.
Transmission Design	ATSI/TE & OE	EXHIBIT 3	7/8	



LEGEND

- - NEW OR REPLACED STRUCTURE
- ⌈⌋ - SUBSTATION FRAME
- ⊠ (with X) - EXISTING LATTICE TOWER TO REMAIN
- ⊠ (with solid) - EXISTING LATTICE TOWER TO BE MODIFIED
- ⊠ (with diagonal lines) - EXISTING LATTICE TOWER TO BE REMOVED
- ⋯ - WATER'S EDGE
- - 138KV TRANSMISSION LINE
- - - - - SUBSTATION FENCE
- ▨ (stippled) - WETLANDS



PAPER SIZE: 17X11

DWG. NO.	REFERENCE	REV.	DATE	BY	APP.	DESCRIPTION

ISSUE DATE:	DR. VG/BV	8/22	C.E. 19-57-OE
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<input type="checkbox"/> RECORD	APP.		SCALE N.T.S.

LAKEVIEW-OTTAWA 138KV RECONDUCTOR GENERAL LAYOUT

	ASSET/OP. CO.	DWG NO.	SHEET	REV.
	ATSI/TE & OE	EXHIBIT 3	8/8	

EXHIBIT #4



ATSI Transmission Zone: Baseline Ottawa-Lakeview 138 kV Reconductor and Upgrades

Previously Presented: 8/31/2018 SR RTEP

Below 200kV

Problem Statement:

2018 RTEP Gen Deliverability Thermal Violation Winter 2023 Case

- For the common tower failure tripping Davis Besse – X1-027A & Beaver – Hayes 345 kV Lines, results in the thermal overload of Ottawa-Lakeview 138 kV line (GD-W218).

Recommended Solution:

Ottawa-Lakeview 138 kV Reconductor and Substation Upgrades (B3033)

- At Ottawa substation, Lakeview exit, replace 954 ACSR line drop conductor with 795 ACSS; replace 1272 SAC substation conductor with 1590 ACSS.
- At Lakeview substation, Ottawa exit, replace 636 ACSR line drop conductor with 795 ACSS; replace 1590 ACSR substation conductor with 1590 ACSS. replace 1600A wave-trap with 2000A wave-trap.
- For the Ottawa-Lakeview 138 kV line, reconductor the existing 336 ACSR six-wired conductor (~ 7.6 miles) with 336 ACSS six-wired; replace single span of 954 ACSR, at Ottawa end, with 795 ACSS.
 - Old rating: 353 / 450 MVA WN / WE
 - New rating: 448 / 543 MVA WN / WE

Estimated Project Cost: \$20.0 M

Projected IS Date: 12/01/2023

Required IS Date: 12/01/2023

Status: Conceptual

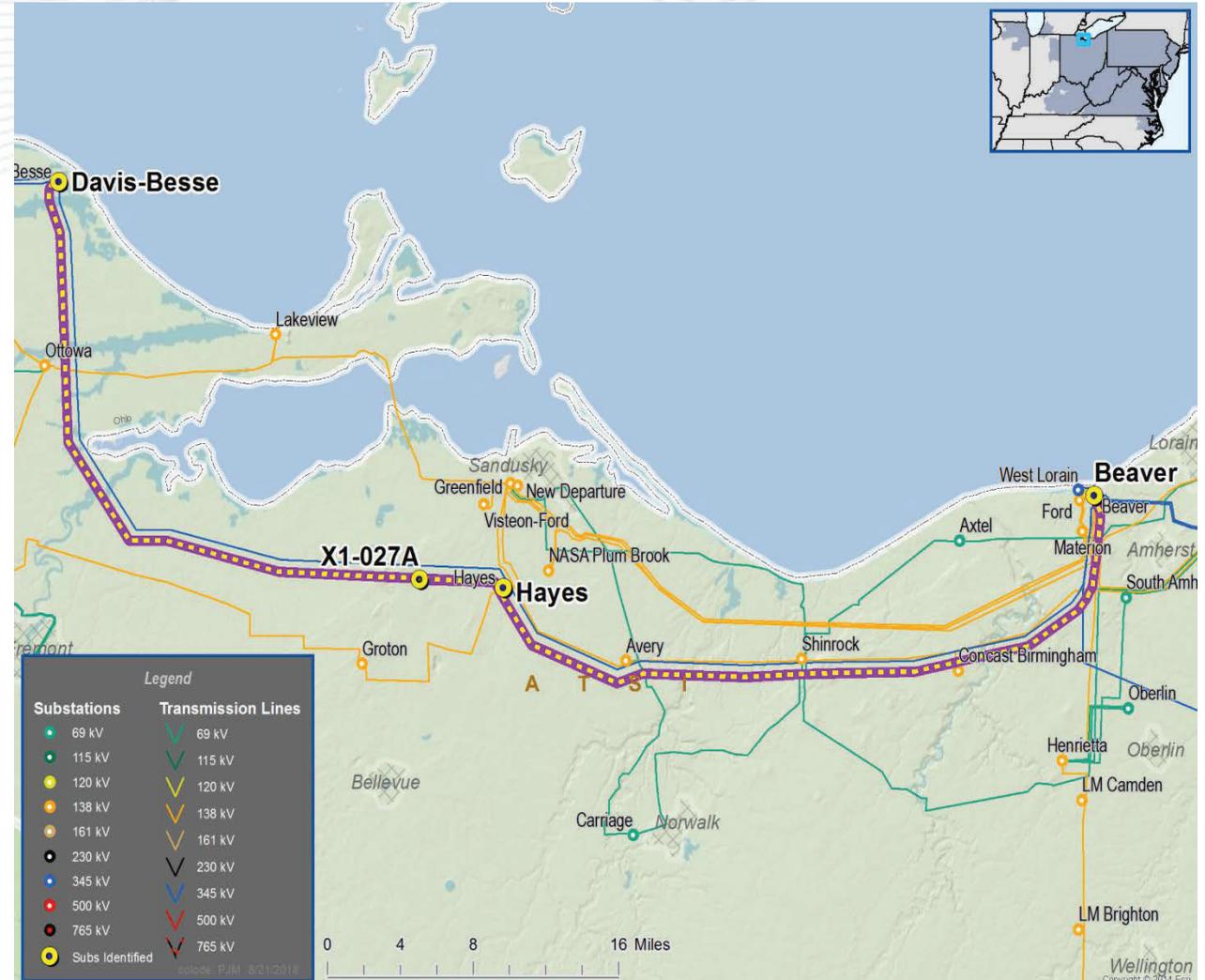
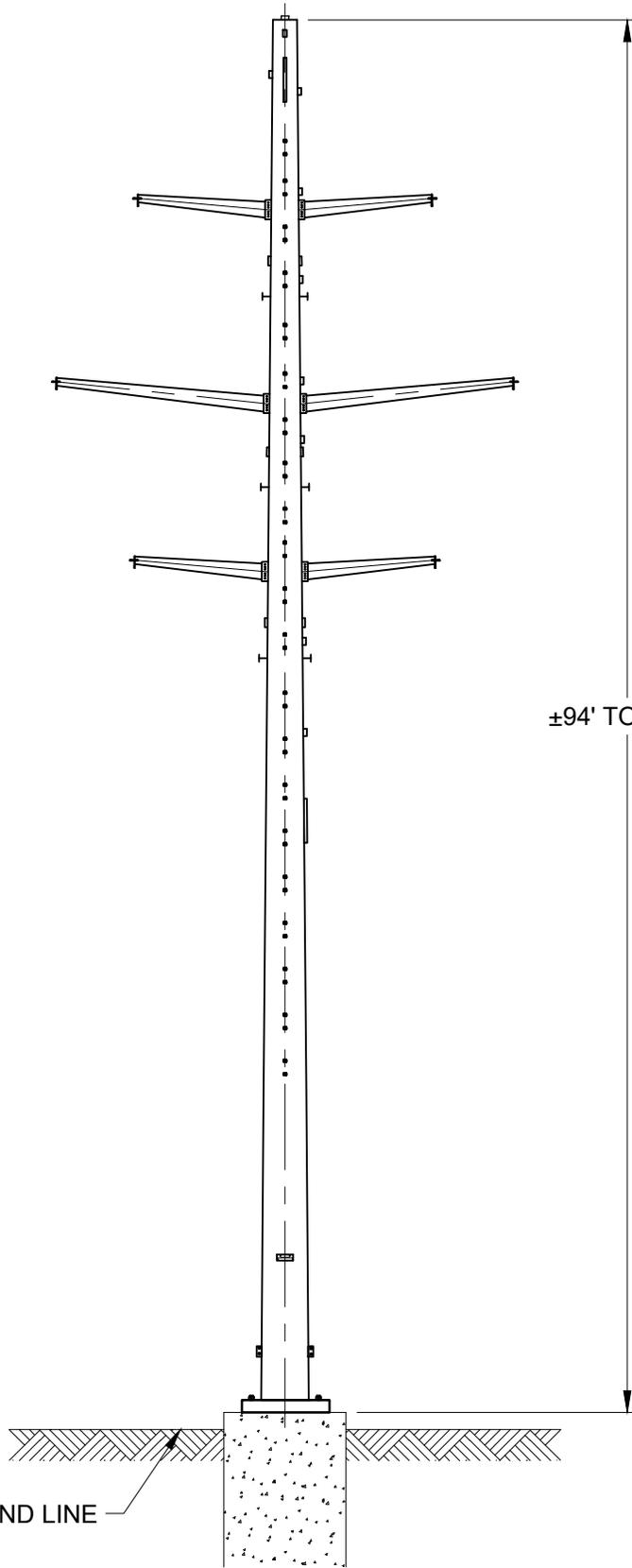


EXHIBIT #5



±94' TO ±108'

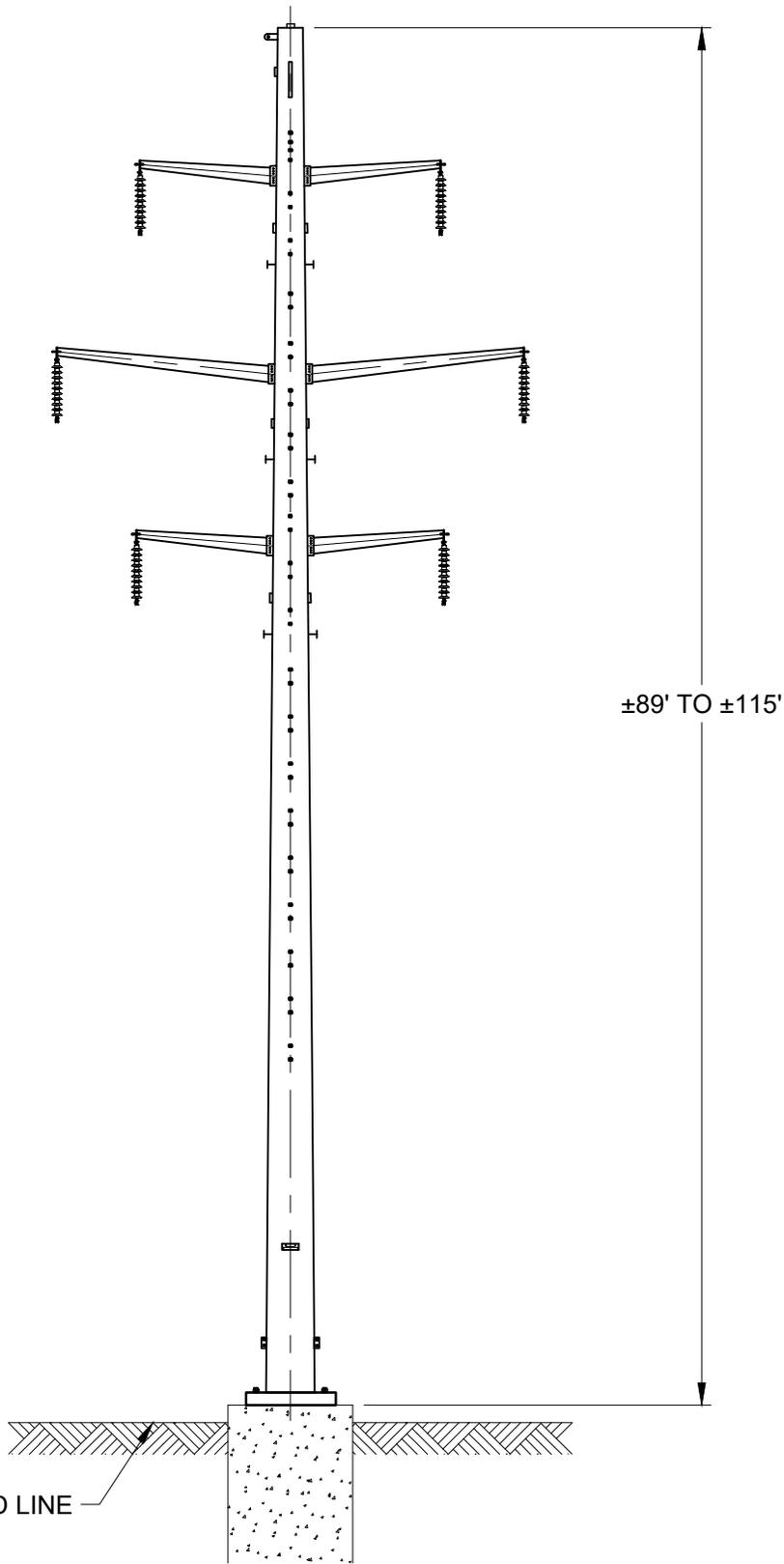
GROUND LINE

PAPER SIZE: 8.5X11

SCALE: NTS

<p>ATSI American Transmission Systems, Inc. <small>a subsidiary of FirstEnergy Corp.</small></p>	<p>LAKEVIEW-OTTAWA 138KV LINE RECONDUCTOR PROJECT</p>
<p>138KV DOUBLE CIRCUIT TUBULAR STEEL POLE DEADEND</p>	
<p>SHEET 1 OF 1</p> <p>EXHIBIT 5</p>	

EXHIBIT #6



GROUND LINE

±89' TO ±115'

ATSI

American Transmission Systems, Inc.
a subsidiary of FirstEnergy Corp.

LAKEVIEW-OTTAWA 138KV LINE RECONDUCTOR PROJECT

138KV DOUBLE CIRCUIT TUBULAR STEEL POLE TANGENT
SHEET 1 OF 1

EXHIBIT 6

PAPER SIZE: 8.5X11

SCALE: NTS

EXHIBIT #7

Exhibit 7
Property Owners
Lakeview-Ottawa 138 kV Transmission Line Reconstructor Project
Case No. 22-0967-EL-BLN

Property Owners

Parcel Number	Easement Status
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07-A-002-L-00-015-0, 07-A-002-L-00-020-0	Existing Existing
07-A-002-L-00-019-0	Existing
07-A-002-L-00-021-0	Existing
07-A-003-O-00-002-0	Existing
07-A-003-V-00-003-0	Existing
07-A-003-V-00-004-0	Existing
07-A-003-V-00-009-0	Existing
07-A-003-V-00-013-0	Existing
07-A-003-V-00-016-0	Existing
07-A-003-V-00-017-0	Existing
07-A-003-V-00023-0	Existing
07-A-003-V-00-026-0, 07-A-003-V-00-011-0	Existing Existing
07-A-003-V-00-029-0	Existing
07-A-003-V-00-030-0, 07-A-003-V-00-010-0	Existing Existing
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07-A-006-0-00-022-0	Existing
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07-A-006-0-00-027-0	Existing

07-A-006-0-00-028-0	Existing
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EXHIBIT #8



State Historic
Preservation Office

Legend

NR Listings

- ◆ Listed
- ⊙ National Historic Landmark
- ✕ Delisted

Determinations of Eligibility

- ◆ DOE
- ✕ Demolished
- Historic Structures
- Historic Bridges
- Historic Tax Credit Projects
- ◆ Local Designations

OGS Cemeteries

- ⊕ Confident
- ⊕ Not Confident

Historic Markers

- ◆ Dams

UTM Zone Split

- ▨ NR Boundaries



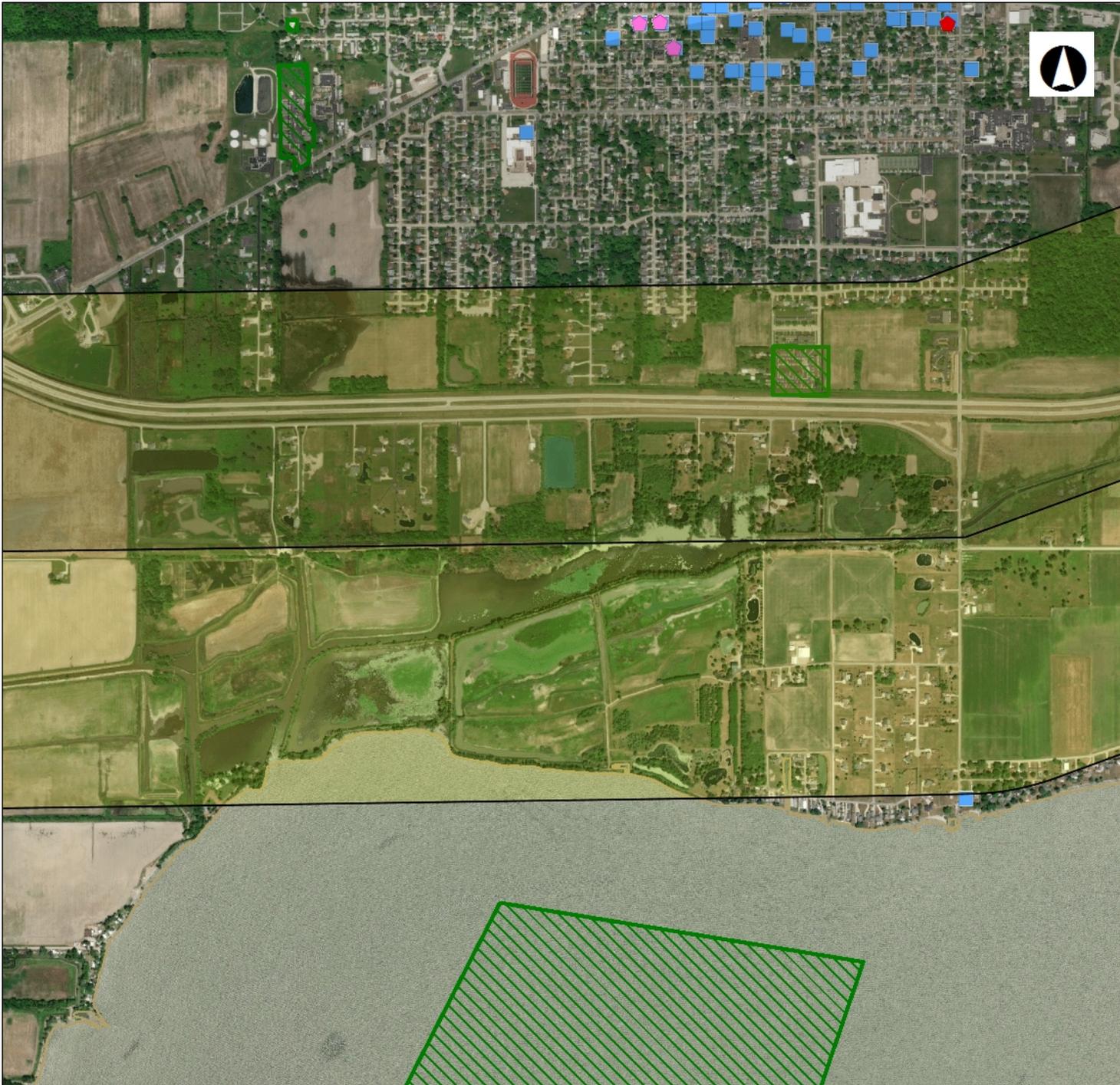
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Datum: [Datum]
Projection: WGS_1984_Web_Mercator_Auxiliary_Sphere





State Historic Preservation Office

Legend

NR Listings

- Listed
- National Historic Landmark
- ✕ Delisted

Determinations of Eligibility

- ◆ DOE
- ✕ Demolished
- Historic Structures
- Historic Bridges
- Historic Tax Credit Projects
- ◆ Local Designations

OGS Cemeteries

- † Confident
- † Not Confident

Historic Markers

- Dams
- UTM Zone Split
- NR Boundaries

0 0.30 0.61 Miles

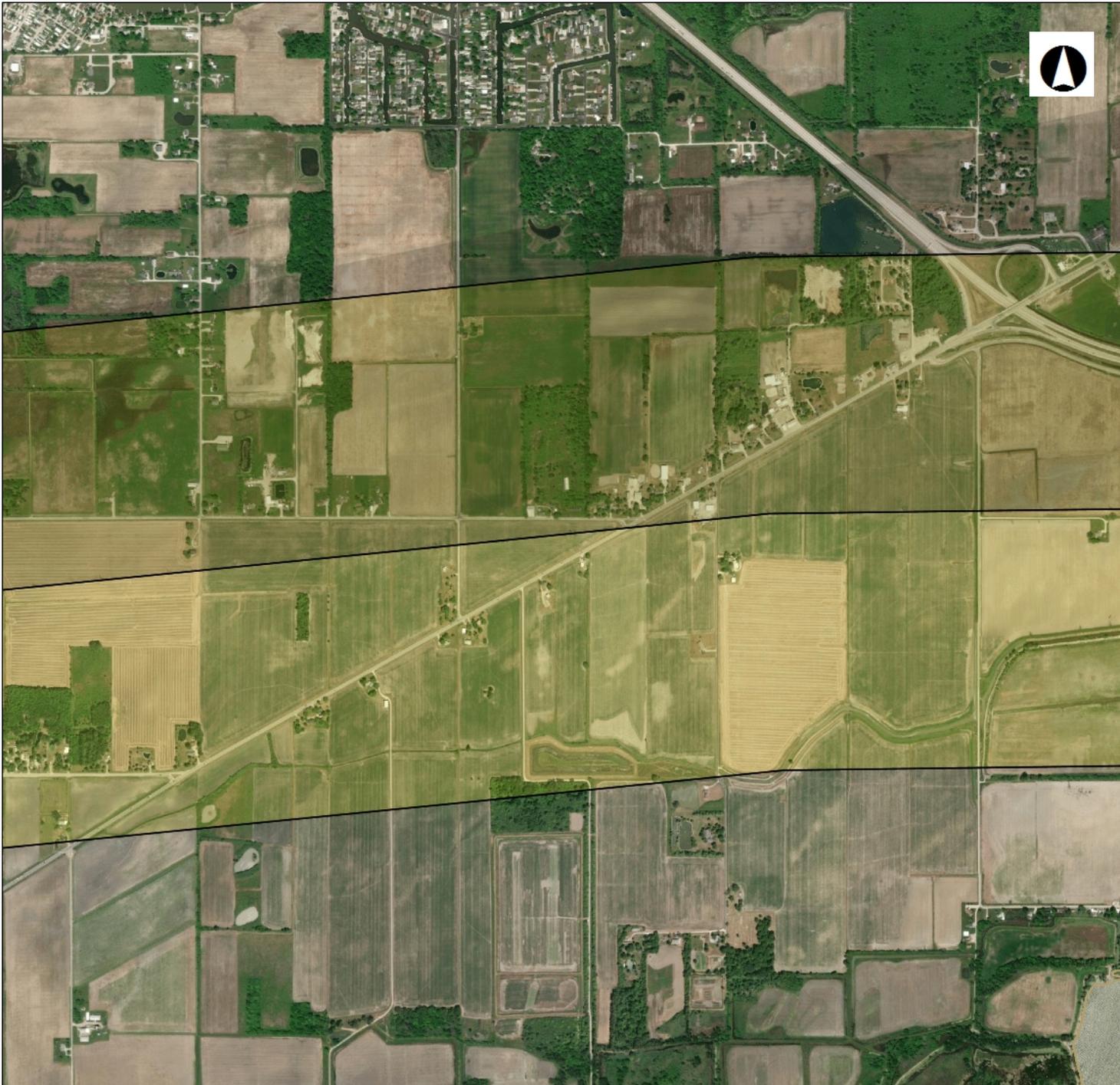
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Datum: [Datum]
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State Historic
Preservation Office

Legend

NR Listings

- Listed
- ⊙ National Historic Landmark
- ✕ Delisted

Determinations of Eligibility

- ◆ DOE
- ✕ Demolished
- Historic Structures
- Historic Bridges
- Historic Tax Credit Projects
- ◆ Local Designations

OGS Cemeteries

- † Confident
- † Not Confident

Historic Markers

- Dams
- UTM Zone Split
- ▣ NR Boundaries

0 0.30 0.61 Miles



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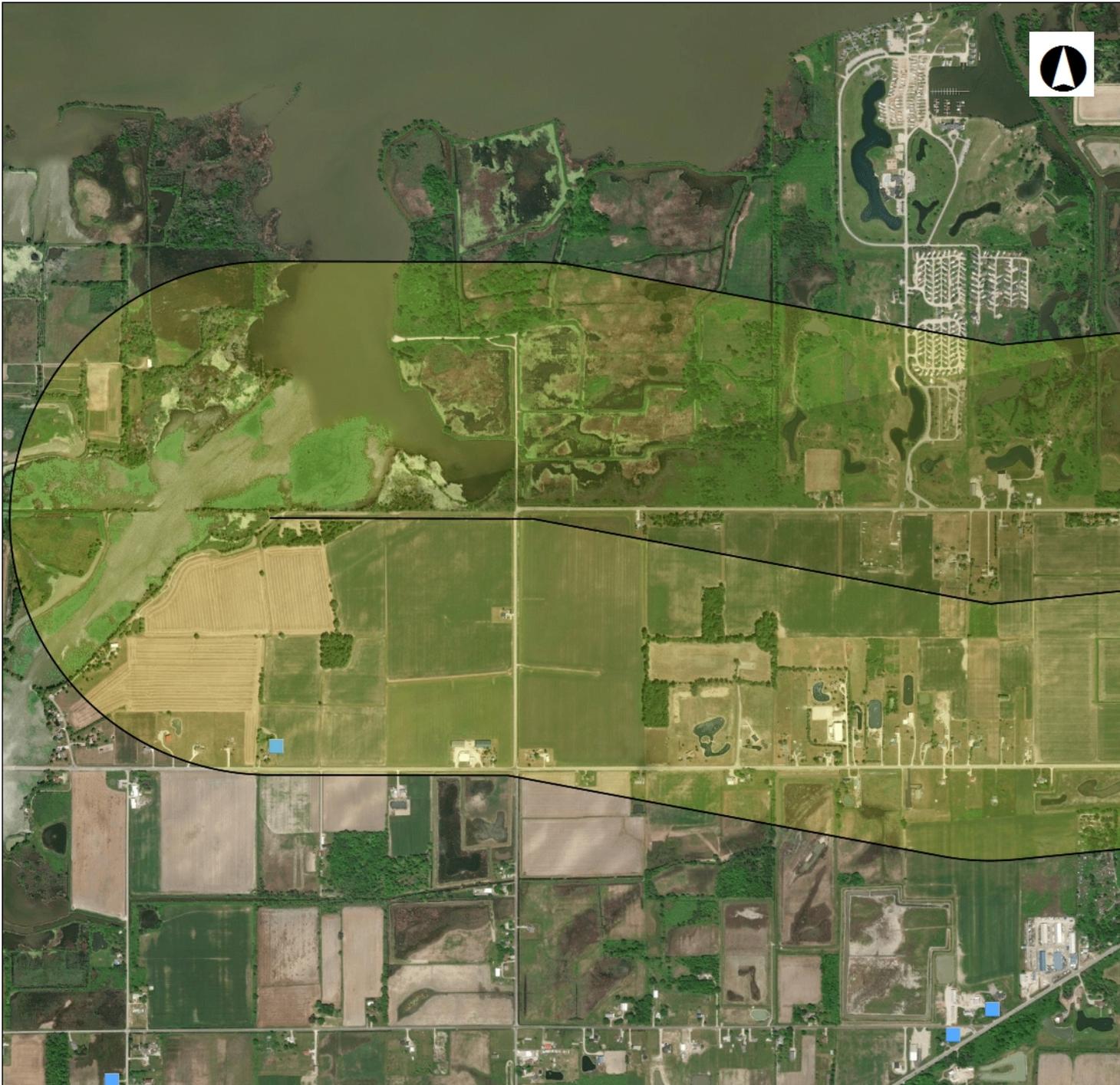
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Datum: [Datum]

Projection: WGS_1984_Web_Mercator_Auxiliary_Sphere





State Historic
Preservation Office

Legend

NR Listings

- Listed
- ⊙ National Historic Landmark
- ✖ Delisted

Determinations of Eligibility

- ◆ DOE
- ✖ Demolished
- Historic Structures
- Historic Bridges
- Historic Tax Credit Projects
- ◆ Local Designations

OGS Cemeteries

- † Confident
- † Not Confident

Historic Markers

- Dams
- UTM Zone Split
- ▧ NR Boundaries

0 0.30 0.61 Miles



1: 24,000

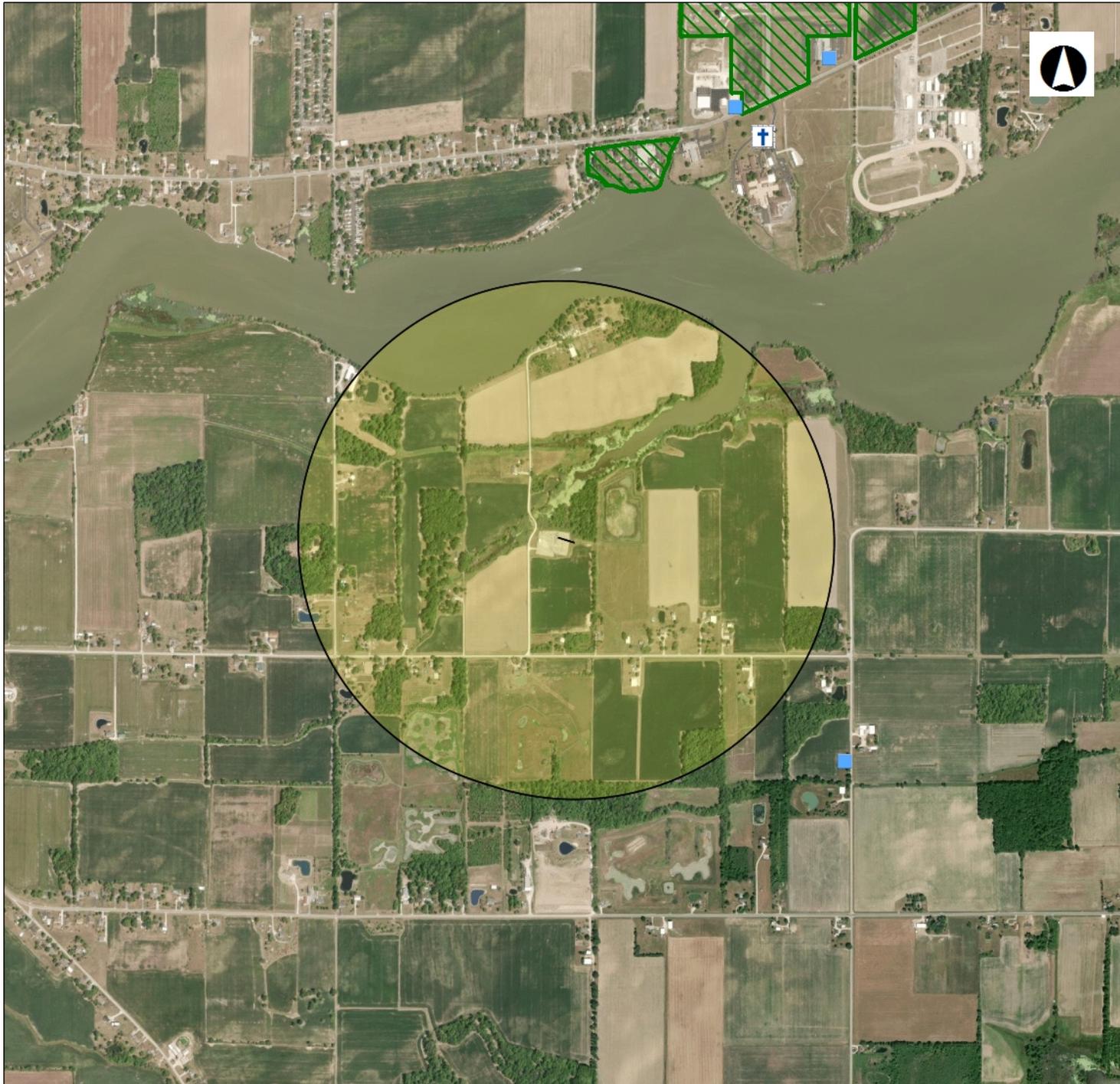
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Datum: [Datum]

Projection: WGS_1984_Web_Mercator_Auxiliary_Sphere





State Historic
Preservation Office

Legend

NR Listings

- Listed
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Datum: [Datum]
Projection: WGS_1984_Web_Mercator_Auxiliary_Sphere



EXHIBIT #9



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

February 5, 2020

Brian Miller
AECOM
525 Vine Street
Cincinnati, Ohio 45202

Re: 20-037; Lakeview - Ottawa 138 kV Line Reconductoring Project

Project: The proposed project involves the reconductoring of 7.8 miles of a 138-kV transmission line.

Location: The proposed project is located in Bay, Portage, and Salem Townships, Ottawa 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 the following records at or within a one-mile radius of the project area:

Schweinitz' umbrella-sedge (*Cyperus schweinitzii*), T
Eastern pondmussel (*Ligumia nasuta*), E
Black sandshell (*Ligumia recta*), T
Threehorn wartyback (*Obliquaria reflexa*), T
Fawnsfoot (*Truncilla donaciformis*), T
Blanding's turtle (*Emydoidea blandingii*), T
Eastern foxsnake (*Pantherophis gloydi*), SC
Melanistic garter snake (*Thamnophis sirtalis sirtalis*), SC
Green-winged teal (*Anas crecca*), SI
Gadwall (*Anas strepera*), SI
Redhead (*Aythya americana*), SI
Ruddy duck (*Oxyura jamaicensis*), SI
Least bittern (*Ixobrychus exilis*), T
Sora rail (*Porzana carolina*), SC
King rail (*Rallus elegans*), E

Virginia rail (*Rallus limicola*), SC
Little Portage Wildlife Area – ODNR Division of Wildlife
Port Clinton Lakeshore Preserve – City of Port Clinton

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. This information is provided to inform you of features present within your project area and vicinity.

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.

Statuses are defined as: E = state endangered; T = state threatened; P = state potentially threatened; SC = state species of concern; SI = state special interest; A = species recently added to state inventory, status not yet determined; X = presumed extirpated in Ohio; FE = federal endangered, FT = federal threatened, FSC = federal species of concern, FC = federal candidate species.

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 range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species. The following species of trees have relatively high value as potential Indiana bat roost trees to include: shagbark hickory (*Carya ovata*), shellbark hickory (*Carya laciniosa*), bitternut hickory (*Carya cordiformis*), black ash (*Fraxinus nigra*), green ash (*Fraxinus pennsylvanica*), white ash (*Fraxinus americana*), shingle oak (*Quercus imbricaria*), northern red oak (*Quercus rubra*), slippery elm (*Ulmus rubra*), American elm (*Ulmus americana*), eastern cottonwood (*Populus deltoides*), silver maple (*Acer saccharinum*), sassafras (*Sassafras albidum*), post oak (*Quercus stellata*), and white oak (*Quercus alba*). Indiana bat roost trees consists of trees that include dead and dying trees with exfoliating bark, crevices, or cavities in upland areas or riparian corridors and living trees with exfoliating bark, cavities, or hollow areas formed from broken branches or tops. However, Indiana bats are also dependent on the forest structure surrounding roost trees. If suitable habitat occurs within the project area, the DOW recommends trees be conserved. If suitable habitat occurs within the project area and trees must be cut, the DOW recommends cutting occur between October 1 and March 31. If suitable trees must be cut during the summer months, the DOW recommends a net survey be conducted between June 1 and August 15, prior to any cutting. Net surveys should incorporate either nine net nights per square 0.5 kilometer of project area, or four net nights per kilometer for linear projects. If no tree removal is proposed, this project is not likely to impact this species.

The project is within the range of the eastern pondmussel (*Ligumia nasuta*), a state endangered mussel, the threehorn wartyback (*Obliquaria reflexa*), a state threatened mussel, the black sandshell (*Ligumia recta*), a state threatened mussel, and the fawnsfoot (*Truncilla donaciformis*), a state threatened mussel. Due to the location, and that there is no in-water work proposed in a perennial stream of sufficient size, this project is not likely to impact these species.

The project is within the range of the western banded killifish (*Fundulus diaphanus menona*), a state endangered fish, the pugnose minnow (*Opsopoeodus emiliae*), a state endangered fish, the lake sturgeon (*Acipenser fulvescens*), a state endangered fish, the spotted gar (*Lepisosteus oculatus*), a state endangered fish, and the channel darter (*Percina copelandi*), a state threatened fish. The DOW recommends no in-water work from April 15 to June 30 to reduce impacts to aquatic species and their habitat. If no in-water work is proposed in a perennial stream, this project is not likely to impact these or other aquatic species.

The project is within the range of the Blanding's turtle (*Emydoidea blandingii*), a state threatened species. This species inhabits marshes, ponds, lakes, streams, wet meadows, and swampy forests. Although essentially aquatic, the Blanding's turtle will travel over land as it moves from one wetland to the next. The DOW recommends that an approved herpetologist conducts a habitat suitability survey along the project route to determine if suitable habitat exists for the Blanding's turtle. If suitable habitat is determined to be present, the DOW recommends that a presence/absence survey be conducted, or an avoidance/minimization plan be developed and implemented by an approved herpetologist.

The project is within the range of the eastern massasauga (*Sistrurus catenatus*), a state endangered and a federally threatened snake species. The eastern massasauga uses a range of habitats including wet prairies, fens, and other wetlands, as well as drier upland habitat. Due to the location, and the type of habitat present within the project area, this project is not likely to impact this species.

The project is within the range of the Kirtland's warbler (*Setophaga kirtlandii*), a state endangered bird. This species migrates through Ohio in the spring and fall, traveling between its breeding grounds in Michigan, Wisconsin, and Ontario and its wintering grounds in the Bahamas. While migration occurs in a broad front across the entire state, approximately half of all observations in Ohio have occurred within 3 miles of the Lake Erie shoreline. Migrating birds usually forage in forested or shrub/scrub habitat and may stay in one area for several days. Because so much of the southern Lake Erie shoreline is already developed, and stopover habitat is already so fragmented, the DOW recommends that this stopover habitat, (i.e. forested or shrub/scrub area), within three miles of the shoreline be preserved whenever possible. If clearing of suitable habitat cannot be avoided, to preclude adverse effects to Kirtland's warblers, clearing within 3 miles of the Lake Erie shoreline should be avoided from April 22nd through June 1st, and from August 15th through October 15th.

The project is within the range of the piping plover (*Charadrius melodus*), a state endangered and federally endangered bird. This species does not nest in the state but does utilize stopover habitat as it migrates through the region. Due to the location, and the type of work proposed, this project is not likely to impact this 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 to 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 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 to 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 black tern (*Chlidonias niger*), a state endangered bird. The black tern prefers large, undisturbed inland marshes with fairly dense vegetation and pockets of open water. They nest in various kinds of marsh vegetation, but cattail marshes are generally favored. Nests are built on top of muskrat houses or on top of floating vegetation. If this type of habitat will be impacted, construction should be avoided in this habitat from April 1 to June 30 to reduce impacts to this species. If no wetland habitat will be impacted, the project is not likely to impact this species.

The project is within the range of the common tern (*Sterna hirundo*), a state endangered bird. The preferred nesting sites of common terns are natural or man-made islands that are free of mammalian predators and human disturbance. They will also utilize mainland beaches and dredge disposal areas but only when islands are unavailable. The common tern nests in colonies. Their eggs are laid in a grass-lined depression in the sand. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 1 to August 1. If no wetland habitat will be impacted, the project is not likely to impact this species.

The project is within the range of the king rail (*Rallus elegans*), a state endangered bird. Nests for this species are deep bowls constructed out of grass and usually hidden very well in marsh vegetation. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 1 to August 1. If no wetland habitat will be impacted, the project is not likely to impact this species.

The project is within the range of the northern harrier (*Circus cyaneus*), 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 May 15 to August 1. If this habitat will not be impacted, the project is not likely to impact 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 to July 31. If this type of habitat will not be impacted, the 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 U.S. 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

ODNR appreciates the opportunity to provide these comments. Please contact Sarah Tebbe, Environmental Specialist, at (614) 265-6397 or Sarah.Tebbe@dnr.state.oh.us if you have questions about these comments or need additional information.

Mike Pettegrew
Environmental Services Administrator (Acting)

Miller, Brian

From: Miller, Brian
Sent: Wednesday, September 7, 2022 10:19 AM
To: sarah.tebbe@dnr.state.oh.us; environmentalreviewrequest@dnr.state.oh.us
Cc: aruggiero@firstenergycorp.com; Holmes, Joshua
Subject: 20-037; Lakeview-Ottawa 138kV Line Reconductoring Project
Attachments: 20-037; AECOM - Lakeview - Ottawa 138 kV Line Reconductoring Project
Comments.pdf

Ms. Tebbe,

AECOM Technical Services, Inc. (AECOM), on behalf of American Transmission Systems, Inc. (ATSI), a FirstEnergy Company requested the environmental review regarding the Lakeview-Ottawa 138kV Transmission Line Reconductoring Project and response was received on February 5, 2022 (ODNR# 20-037). Due to the timeline of our last coordination, ATSI is requesting your confirmation that the previous coordination and listed species within range of the Project is still valid.

ATSI and AECOM would appreciate an expedited review and response, as it will assist with ATSI's permit and construction team development of the route that avoids and minimize impacts to sensitive areas and species identified by your agency.

Thanks,

Brian J. Miller
Project Manager / Senior Ecologist

M +1-412-667-9172
brian.miller1@aecom.com

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aecom.com

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EXHIBIT #10

Miller, Brian

From: susan_zimmermann@fws.gov on behalf of Ohio, FW3 <ohio@fws.gov>
Sent: Monday, December 30, 2019 1:04 PM
To: Miller, Brian
Cc: nathan.reardon@dnr.state.oh.us; kate.parsons@dnr.state.oh.us
Subject: Lakeview-Ottawa 138 kV Transmission Line Reconductoring, Ottawa Co.

Follow Up Flag: Follow up
Flag Status: Completed



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# 03E15000-2020-TA-0471

Dear Mr. Miller,

We have received your recent correspondence requesting information about the subject proposal. There are no federal wilderness areas, wildlife refuges or designated critical habitat within the vicinity of the project area. The following comments and recommendations will assist you in fulfilling the requirements for consultation under section 7 of the Endangered Species Act of 1973, as amended (ESA).

The U.S. Fish and Wildlife Service (Service) recommends that proposed developments avoid and minimize water quality impacts and impacts to high quality fish and wildlife habitat (e.g., forests, streams, wetlands). Additionally, natural buffers around streams and wetlands should be preserved to enhance beneficial functions. If streams or wetlands will be impacted, the 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. All disturbed areas should be mulched and revegetated with native plant species. Prevention of non-native, invasive plant establishment is critical in maintaining high quality habitats.

FEDERALLY LISTED SPECIES COMMENTS: All projects in the State of Ohio lie within the range of the federally endangered **Indiana bat** (*Myotis sodalis*) and the federally threatened **northern long-eared bat** (*Myotis septentrionalis*). In Ohio, presence of the Indiana bat and northern long-eared bat is assumed 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 travel and may also include some adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, old fields and pastures. This includes forests and woodlots containing potential roosts (i.e., live trees and/or snags ≥ 3 inches diameter at breast height (dbh) that have any exfoliating bark, cracks, crevices, hollows and/or cavities), as well as linear features such as fencerows, riparian forests, and other wooded corridors. These wooded areas may be dense or loose aggregates of trees with variable amounts of canopy closure. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet (305 meters) 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 and abandoned mines.

Should the proposed site contain trees ≥ 3 inches dbh, we recommend that trees be saved 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 ≥ 3 inches dbh cannot be avoided, we

recommend that removal of any trees >3 inches dbh only occur between October 1 and March 31. Seasonal clearing is being 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, summer surveys may be conducted to document the presence or probable absence of Indiana bats within the project area during the summer. If a summer survey documents probable absence of Indiana bats, the 4(d) rule for the northern long-eared bat could be applied. Surveys must be conducted by an approved surveyor and be designed and conducted in coordination with the Endangered Species Coordinator for this 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.

The project lies within the range of the **eastern massasauga** (*Sistrurus catenatus*), a small, docile rattlesnake that is federally listed as threatened. Several factors have contributed to the decline of the species including habitat loss and fragmentation, indiscriminate killing, collection, gene pool contamination and incompatible land use practices.

Eastern massasaugas use both upland and wetland habitat and these habitats differ by season. During the winter, massasaugas hibernate in low wet areas, primarily in crayfish burrows, but may use other structures. Presence of a water table near the surface is important for a suitable hibernaculum. In the summer, massasaugas use drier, open areas that contain a mix of grasses and forbs such as goldenrods and other prairie plants that may be intermixed with trees or shrubs. Adjoining lowland and upland habitat with variable elevations between are critical for the species to travel back and forth seasonally. Should the proposed project area contain any of the habitat types or features described above, we recommend that a habitat assessment be conducted to determine if suitable habitat for the species exists within the vicinity of the proposed site. Please note that habitat assessments should only be conducted by a herpetologist permitted by the Ohio Division of Wildlife to conduct eastern massasauga surveys (list attached) due to variable habitat types and the cryptic nature of the species. Any habitat assessments or surveys should be coordinated with this office.

BALD EAGLE COMMENTS: The project lies within the range of the bald eagle (*Haliaeetus leucocephalus*). Bald eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668-668d, BGEPA), which prohibits, among other things, the killing and disturbance of eagles.

Our records indicate that a bald eagle nest is located within ½ mile of the project area. To evaluate your project's potential to affect bald eagles, please visit: <https://www.fws.gov/midwest/eagle/permits/baeatake/index.html>.

In order to avoid take of bald eagles, we recommend that no tree clearing occur within 660 feet of a bald eagle nest or within any woodlot supporting a nest tree. Further, we request that work within 660 feet of a nest or within the direct line-of-site of a nest be restricted from January 15 through July 31. This will prevent disturbance of the eagles from the egg-laying period until the young fledge, which encompasses their most vulnerable times.

If these recommendations cannot be implemented and take of bald eagles is likely, a bald eagle take permit for this project may be necessary. Further information on eagle take permits can be found at: <https://www.fws.gov/midwest/eagle/permits/baeatake/index.html>.

The proposed project lies within the range of the **eastern prairie fringed orchid** (*Platanthera leucophaea*), a federally listed threatened species. This tall, showy orchid is found in wet prairies, sedge meadows, and moist road-side ditches. We recommend that the project location be examined to determine if suitable habitat for the orchid is present. If suitable habitat is present, we recommend that surveys for this species be conducted when the orchids are in bloom (late June through early July).

If there is a federal nexus for the project (e.g., federal funding provided, federal permits required to construct), 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 that 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.

Due to the project type, size, and location, we do not anticipate adverse effects to any other federally endangered, threatened, proposed, or candidate species. Should the project design change, or during the term of this action, 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, consultation with the Service should be initiated to assess any potential impacts.

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 ESA, and are consistent with the intent of the National Environmental Policy Act of 1969 and the Service's Mitigation Policy. This letter provides technical assistance only and does not serve as a completed section 7 consultation document. We recommend that the project be coordinated with the Ohio Department of Natural Resources due to the potential for the project to affect state listed species and/or state lands. Contact John Kessler, Environmental Services Administrator, at (614) 265-6621 or at john.kessler@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.

Sincerely,

A handwritten signature in blue ink, appearing to read "Patrice M. Ashfield".

Patrice M. Ashfield
Field Office Supervisor

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

Miller, Brian

From: Miller, Brian
Sent: Wednesday, September 7, 2022 10:06 AM
To: Ashfield, Patrice; Ohio, FW3
Cc: aruggiero@firstenergycorp.com; Holmes, Joshua
Subject: USFWS Technical Review (TAILS# 03E15000-2020-TA-0471)
Attachments: USFWS_Response_TAILS03E15000-2020-TA-0471.pdf

Ms. Ashfield,

AECOM Technical Services, Inc. (AECOM), on behalf of American Transmission Systems, Inc. (ATSI), a FirstEnergy Company, requested your technical assistance regarding the Lakeview-Ottawa 138kV Transmission Line Reconductoring Project and response was received on December 30, 2019 (TAILS# 03E15000-2020-TA-0471). Due to the timeline of our last coordination, ATSI is requesting your confirmation that the previous coordination and listed species within range of the Project is still valid.

ATSI and AECOM would appreciate an expedited review and response, as it will assist with ATSI's permit and construction team development of the route that avoids and minimize impacts to sensitive areas and species identified by your agency.

Thank you,

Brian J. Miller
Project Manager / Senior Ecologist

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EXHIBIT #11

**Report - Blanding's Turtle (*Emydoidea blandingii*) and Eastern Massasauga
(*Sistrurus catenatus*) Habitat Survey Lakeview – Ottawa
138 kV Line Reconducting Project**



Blanding's Turtle



Eastern Massasauga

**Auggie Ruggiero
FirstEnergy
341 White Pond Drive
Akron, Ohio 44320**

October 4, 2021

Prepared by:

**Jeffrey G. Davis
625 Crescent Rd.
Hamilton, OH 45013
ohiofrogs@gmail.com
513.470.8748**

INTRODUCTION

This report provides the results of a Habitat Survey Blanding's Turtle and the Eastern Massasauga along the Lakeview – Ottawa 138 kV Line Reconducting Project that extends from the Lakeview Substation at 41.51393° N, -82.91435° W in Port Clinton (Ottawa County, Portage Township; Figure 1) across Bay Township, and to the western terminus at the Ottawa Substation at 41.49688° N, -83.09770° W in Ottawa County, Salem Township.

1.0 Blanding's Turtle Life History

Blanding's Turtle (Figure 2) is a medium-sized species (to 11 inches) that is easily identified by its bright yellow throat. In the Great Lakes region, it inhabits heavily vegetated, shallow wetlands. In early spring, individuals migrate to breeding sites. Mating has been observed throughout the active season and like other closely related species, females probably store sperm. They may mate on land close to their aquatic habitat but usually do so in a wetland (i.e., vernal pool or marsh). Nesting takes place from late May to early July and females may move great distances over land to find a suitable nesting site. Nests are dug in areas with an open canopy and in Ohio females have been observed nesting in bare agricultural fields. Hatching occurs in late mid-August to early October and hatchlings are known to migrate to water in their first year, but preliminary evidence suggests they may be able to overwinter on land as they have been shown to survive -3.5°C for 72 days.

Blanding's Turtles hibernate from approximately October 15 to March 15 beneath overhanging banks, in muskrat huts, or under thick mats of vegetation in ponds, creeks, ditches, and marshes. They are known to move under the ice and may change from one hibernaculum to another during a single winter. Blanding's Turtle is most active during spring and is often observed basking on emergent logs or grass clumps. When disturbed they take to the water and bury themselves in the mud. During the summer months, they may move into grasslands adjacent to their freshwater shelters. Radiotracked individuals in Fulton County, Ohio moved more than 13 miles in a single summer through networks of drainage ditches and wetland habitat.

Crayfish predominate the species' diet, but other crustaceans, mollusks, leeches, insects, fish, amphibians, birds and plant matter (berries and leaves) may also be included.

2.0 Eastern Massasauga Life History

The Eastern Massasauga (Figure 3), reaching a record length of 100.3 cm (39.5 inches), is the smallest rattlesnake species in Ohio. Most individuals however are approximately 45.7–55.9 cm (18–22 inches) in length. Massasaugas have brown or black blotches on a gray or tan background and white and brown stripes on the sides of their head. Some individuals are melanistic, a form which tends to be more common in northern populations.

Massasaugas are almost always associated with wet areas such as bogs, fens, swamps, and the edges of ponds and lakes. They overwinter in these wet areas, especially in crayfish burrows, and are believed to then move into upland habitats dominated by grasses and prairie plants. In some populations only gravid females may demonstrate the habitat change. These grassy areas are almost always a mosaic of small, early successional woody species such as hawthorn (*Crataegus sp.*), dogwood (*Cornus sp.*), multiflora rose (*Rosa multiflora*) or raspberry (*Rubus sp.*). Common herbaceous species associated with Massasaugas may include the sensitive fern (*Onoclea sensibilis*), goldenrod (*Solidago sp.*), partridge pea (*Cassia fasciculata*), cinquefoil (*Potentilla sp.*), strawberry (*Fragaria sp.*), and *Sphagnum*. This diversity of plant species indicates that the Massasauga can be found in a variety of habitats. It has been suggested that their diet in the spring contains frogs and then switches to small mammals and birds as they move into the higher, drier habitats during summer. Telemetric studies indicate that males and non-pregnant females may range 200–1300 m (650–4,265 feet) from their winter hibernacula. Pregnant females may move 300–600 m (984–1968.5 feet).

Sexual maturity among Massasaugas is believed to be reached at 3–4 years depending upon food availability, length of their activity period, and availability of suitable basking sites. They mate from mid-July to September. From mid-August to September, 3–19 neonates are born close to the mother's hibernaculum. Across their range Massasaugas may reproduce annually or biannually. In captivity the species may live over 20 years and in the wild from 8–10 years.

Massasaugas have been extirpated from much of their historical range as a result of habitat destruction and persecution. Originally found in at least 30 Ohio counties, populations are now thought to occur in just eight or nine. Most Ohio Massasauga populations are isolated and there is potential for loss of genetic diversity by inbreeding and genetic drift. As a result of the significant decline, the State of Ohio listed the Massasauga as Endangered in 1996 and the U.S. Fish and Wildlife Service listed it as a candidate species in 1998. It was listed as Federally Threatened in October 2017.

3.0 Methods

3.1 Desktop Survey

3.1.1 Museum Records

A search was conducted to determine if Blanding's Turtles have been documented from the three townships through which the ROW extends.

3.1.2 Literature Search

A literature search was done to determine if Blanding's Turtles have been reported from the three townships through which the ROW extends.

3.1.3 Examination of Aerial Photographs and Soil Maps

Aerial photographs of the transmission line right of way (ROW) were examined for wetlands (permanent wetlands, potential seasonally flooded wetlands, or ditches) suitable for Blanding's Turtle and their proximity to each structure (transmission line tower). A site visit was scheduled to examine any potential habitat identified during the desktop survey. Some towers were not in suitable habitat but were in potential nesting habitat.

Aerial photographs were used to look for upland fields which might provide summer habitat for Eastern Massasaugas adjacent to wetlands where they could overwinter. Massasaugas are usually associated with heavy clay loam or muck soils. Soil maps were examined to determine if appropriate soils were present in any fields identified as potential Massasauga habitat.

3.1.4 Site visit

A site visit was made on 1 October 2021 to examine towers identified as providing suitable habitat during the desktop survey.

4.0 Results

4.1 Museum Search

4.1.1 Blanding's Turtle

There were 21 museum records of Blanding's Turtles from Ottawa County, Bay Township. Six of these were photographic records in the Cincinnati Museum Center's photodocumentation collection (Table 1). All of them were from 2019. The other 15 records were accessioned into the Cleveland Museum of Natural History's collections between 1970 and 2008. Those in the Cincinnati collection were recorded during a survey Greg Lipps, Jr. conducted for the Ohio Department of Natural Resources (ODNR). No collector was listed for the Cleveland specimens but 19 were collected between 2006 and 2008, likely by Jim Spetz (Cleveland MetroParks) who conducted surveys for ODNR during that time period. No museum records for Blanding's Turtles were found for Portage or Salem Township.

4.1.2 Eastern Massasauga

Six records of the Eastern Massasauga from Ottawa County, Bay Township were found in the United States National Museum (USNM) and the Ohio State University Museum (OSUM) (Table 2). Those in the USNM were from the Lake Erie islands. The only record from the mainland is the OSUM record. It came from the Winous Point Shooting Club which is just 2.2 miles south of the ROW but separated from it by more than 1.1 miles of agricultural fields.

4.2 Literature Search

4.2.1 Blanding's Turtle

Conant (1951) lists records for Ottawa County, Portage and Salem Townships (Conant 1951). The Portage Township record came from one mile east of Port Clinton and the Salem Township record is from Oak Harbor. Spetz et al. (2021) do not add any additional records.

4.2.2 Eastern Massasauga

Conant 1951 lists no records. Smeenk et al. (2021) list the OSUM record from Bay Township found during the museum search, but no others.

5.0 Recommendations

5.1 Eastern Massasauga

The single record for the Eastern Massasauga from Bay Township is more than 50 years old and the locality from which it was collected is separated from the Lakeview – Ottawa ROW by more than a mile of agricultural land. **No further consideration for the Eastern Massasauga is warranted on this project.**

5.2 Blanding's Turtle

Habitats for Blanding's Turtle along the ROW range from unsuitable (agricultural and a small portion is urban) to optimal. Some of the structures are along ditches that may be used as migration corridors when they are flooded or nesting habitat when not flooded. Still others are in optimal habitat for the species. Recommendations are made, in most cases, for segments of the ROW except for Structure 111.5 at the Ottawa substation.

Because any work conducted on this project will only occur at the structures, having an ODNR Approved Herpetologist for this species present when construction involves heavy equipment is recommended. Since the habitat in some segments of the project is optimal for Blanding's Turtle, the recommendations following a Presence – Absence Survey, if one were conducted, would likely be the same (Approved Herpetologist on site during construction). Blanding's Turtles leave the water and wander terrestrially between water bodies and to look for suitable nesting sites, therefore the use of any heavy equipment around structures could impact turtles or nests unless the work is conducted between November and March when they are hibernating. **Table 3 describes concerns or lack of concerns for segments of structures. The table is intended to facilitate planning for construction as opposed to listing segments and describing concerns in a sentence or paragraph format.**

An addendum at the end of this document offers photos of towers or segments of towers along the ROW that are associated with recommendations in Table 3.

Literature Cited

Conant R. 1951. The Reptiles of Ohio. Second Edition. University of Notre Dame, Notre Dame, Indiana. Vi+284 p.

Smeenk N.A., G.L. Lipps, Jr., D. Wynn. 2021. Eastern Massasauga. Pages 847 – 866. In: Davis, J.G., G.J. Lipps, Jr., D. Wynn, B.J. Armitage, T.O. Matson, R.A. Pfingsten, and C. Caldwell (Editors). 2021. Reptiles of Ohio. Ohio Biological Survey Bulletin New Series. Volume 20 Number 1. Part I. xiv + 402 p.

Spetz J.C., C.A. Sheil, T.L. Robison. 2021. Blanding's Turtle. Pages 157-177. In: Davis, J.G., G.J. Lipps, Jr., D. Wynn, B.J. Armitage, T.O. Matson, R.A. Pfingsten, and C. Caldwell (Editors). 2021. Reptiles of Ohio. Ohio Biological Survey Bulletin New Series. Volume 20 Number 1. Part I. xiv + 402 p.

Figure 1. The subject site is the Lakeview – Ottawa 138 kV Line Reconducting Project that extends from the Lakeview Substation at 41.51393°N, -82.91435°W in Port Clinton (Ottawa County, Portage Township) to the Ottawa Substation at 41.49688 °N, -83.09770°W Ottawa County, Salem Township.



Figure 2. Blanding's Turtle



Figure 3. Eastern Massasauga



Table 1. Blanding's Turtle records from Ottawa County, Bay Township in the Cincinnati Museum Center and Cleveland Museum of Natural History collections.

Museum	Accession No.	Year
Cincinnati	HP 11098	2019
Cincinnati	HP 11092	2019
Cincinnati	HP 11093	2019
Cincinnati	HP 11106	2019
Cincinnati	HP 11108	2019
Cincinnati	HP 11109	2019
Cleveland	CMNH 1825	1970
Cleveland	CMNH 1796	1977
Cleveland	CMNH 1796	1977
Cleveland	CMNH 13439	2006
Cleveland	CMNH 13918	2006
Cleveland	CMNH 13913	2006
Cleveland	CMNH 13915	2007
Cleveland	CMNH 13444	2007
Cleveland	CMNH 13914	2007
Cleveland	CMNH 13917	2007
Cleveland	CMNH 13916	2007
Cleveland	CMNH 13440	2007
Cleveland	CMNH 13442	2007
Cleveland	CMNH 13441	2007
Cleveland	CMNH 13443	2007
Cleveland	CMNH 13440	2007
Cleveland	CMNH 13442	2007
Cleveland	CMNH 13912	2008

Table 2. Eastern Massasauga records from Ottawa County, Bay Township. Those in the U.S. National Museum are from the offshore islands.

Museum	Accession No.	Year
U.S. National Museum	145604	n/a
U.S. National Museum	145602	n/a
U.S. National Museum	145605	n/a
U.S. National Museum	145606	n/a
U.S. National Museum	145603	n/a
Ohio State University Museum	1324	1968

Table 3. Recommendations for Blanding’s Turtle avoidance if construction is conducted between mid-March and mid-November. If work is conducted between mid-November and mid-March, turtles will be hibernating. Photographs of the sites for which recommendations are made in this table are provided in an addendum beginning on the next page of this report.

Segment of Structures	Recommendation(s)	Notes
Lakeview Subst - 1403	None	Habitat is not suitable
1404 - 1409	If heavy equipment is used during construction, an ODNR approved herpetologist should be present to monitor for turtles.	Suitable habitat for turtles or nesting is at or near the structure.
1410 - 1416	None	Habitat south of the wetland adjacent to the ROW is more suitable. Structure 1416 is near a potential migration ditch, but its banks are nearly vertical and land to the south is largely agricultural.
1417 - 1443	None	Structures are in agricultural fields.
1444	If heavy equipment is used during construction, an ODNR approved herpetologist should be present to monitor for turtles.	Ditch opposite Darr-Hopfinger Rd. had water and painted turtles on day of site visit. Little Portage Wildlife Area is adjacent to ditch and provides habitat. Structure 1444 is in a potential nesting field.
1445 - 1448A	If heavy equipment is used during construction, an ODNR approved herpetologist should be present to monitor for turtles.	Structures are situated along a ditch that could be used when flooded. Marshland along the Little Portage River extends to within 50 m along this segment of structures. Dike between ditch and marshland is potential nesting habitat.
111.5	None	Delineated wetland at the perimeter of the substation is small and at the base of the gravel pad at the Ottawa substation.

Addendum

Structure 1404 relative to the Wonnell Ditch at East Lockwood Road and Fulton Street.



Looking east from structure 1408 at structures 1407 to 1405. The wetland and its emergent vegetation provide optimal habitat.



Looking west from structure 1408 at structure 1409, 1410, and beyond. Structures 1408 and 1409 were at the edge of optimal habitat.



Looking east at structure 1416, 1417 and beyond. Structure 1416 is located near a ditch, but the walls of the ditch were nearly vertical and too steep for Blanding's Turtle to climb.



Structure 1444 is in an agricultural field approximately 35 m from the ditch pictured below and the Little Portage River Wildlife Area beyond. The area around the structure provides potential nesting habitat.



Looking west at structure 1445 to 1448A. These structures are located at the edge of ditch, that if flooded in spring, could be used by Blanding's Turtles. The dike provides potential nesting habitat. The tree line on the right side of the photo is adjacent to marshland at the edge of the Little Portage River (bottom photo). The bottom photo was taken through the tree line shown in the top photo.



EXHIBIT #12

Miller, Brian

To: Miller, Brian
Subject: RE: USFWS TAILS 03E15000-2020-TA-0471 and ODNR # 20-0890 Lakeview-Ottawa 138kV Line Reconductoring Project - Blanding and Eastern Massasauga Report

From: Nathan.Reardon@dnr.ohio.gov <Nathan.Reardon@dnr.ohio.gov>
Sent: Tuesday, October 11, 2022 9:18 AM
To: Mike.Pettegrew@dnr.ohio.gov; Miller, Brian <brian.miller1@aecom.com>
Cc: Ruggiero, Augustine (Jirousek, Michael J.) <aruggiero@firstenergycorp.com>
Subject: RE: USFWS TAILS 03E15000-2020-TA-0471 and ODNR # 20-0890 Lakeview-Ottawa 138kV Line Reconductoring Project - Blanding and Eastern Massasauga Report

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Brian,

The DOW concurs with Mr. Davis' assessment regarding Blanding's turtle and eastern massasauga suitable habitat within the project area. Additionally, the DOW concurs the proposed avoidance/minimization recommendations are sufficient in minimizing impacts to the Blanding's turtle. Please continue to coordinate with Mr. Davis.

Thank you,
Nathan



Nathan Reardon
Compliance Coordinator
ODNR Division of Wildlife
2045 Morse Road
Columbus, OH 43229
Phone: 614-265-6741
Email: nathan.reardon@dnr.ohio.gov

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From: Pettegrew, Mike <Mike.Pettegrew@dnr.ohio.gov>
Sent: Friday, October 7, 2022 7:53 AM
To: Reardon, Nathan <Nathan.Reardon@dnr.ohio.gov>
Subject: Fwd: USFWS TAILS 03E15000-2020-TA-0471 and ODNR # 20-0890 Lakeview-Ottawa 138kV Line Reconductoring Project - Blanding and Eastern Massasauga Report

Please review and provide comment/concurrence as needed. Thanks.

Mike Pettegrew
Environmental Services Administrator
Ohio Department of Natural Resources, Real Estate and Land Management
2045 Morse Road E-2
Columbus OH 43229
mike.pettegrew@dnr.ohio.gov

From: Miller, Brian <brian.miller1@aecom.com>
Sent: Friday, October 7, 2022 3:35:17 AM
To: Ohio, FW3 <Ohio@fws.gov>; Pettegrew, Mike <Mike.Pettegrew@dnr.ohio.gov>
Cc: aruggiero@firstenergycorp.com <aruggiero@firstenergycorp.com>
Subject: USFWS TAILS 03E15000-2020-TA-0471 and ODNR # 20-0890 Lakeview-Ottawa 138kV Line Reconductoring Project - Blanding and Eastern Massasauga Report

To whom it concerns,

On behalf of American Transmission Systems, Inc. (ATSI), a FirstEnergy Company, Jeff Davis, an approved herpetologist, completed a Report – Blanding’s Turtle (*Emydoidea blandingii*) and Eastern Massasauga (*Sistrurus catenatus*) Habitat Survey Lakeview – Ottawa 138kV Line Reconducting Project on October 4, 2021 as part of the Lakeview – Ottawa 138kV Transmission Line Reconductoring Project. Based on Mr. Davis recommendations, potential suitable habitat was identified for Blanding’s Turtle and ATSI intends to adhere to limiting construction near the identified habitats to occur between November and March as well as attain Mr. Davis during construction to monitor activities to avoid incidental impacts to the listed species. Regarding the eastern massasauga, Mr. Davis identified that site records of the species present within the area is isolated to Lake Erie Islands and only one record was identified on the mainland that is over 50 years old. Therefore, Mr. Davis recommend no further consideration would be warranted due to absence of populations within the Project area. Therefore, ATSI would like to request your approval of the attached survey report and recommendations.

If you have any further questions, please let us know.

Brian J. Miller
Project Manager / Senior Ecologist

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Miller, Brian

Subject: RE: USFWS TAILS 03E15000-2020-TA-0471 Project Code: 2023-0005599 and ODNR # 20-0890 Lakeview-Ottawa 138kV Line Reconductoring Project

From: Finfera, Jennifer <jennifer_finfera@fws.gov> **On Behalf Of** Ohio, FW3

Sent: Tuesday, October 18, 2022 1:45 PM

To: Miller, Brian <brian.miller1@aecom.com>

Cc: nathan.reardon@dnr.state.oh.us; eileen.wyza@dnr.ohio.gov

Subject: USFWS TAILS 03E15000-2020-TA-0471 Project Code: 2023-0005599 and ODNR # 20-0890 Lakeview-Ottawa 138kV Line Reconductoring Project

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Brian,

Our tracking system has changed and we encourage you to use project code 2023-0005599 to reference this project in the future.

We have reviewed the information for eastern prairie fringed orchid, Blanding's turtle and eastern massasauga. Due to the survey results and habitat survey information, we have no objection to your proposed avoidance and minimization measures for the Blanding's turtle. No additional measures are required for the eastern massasauga or eastern prairie fringed orchid. We do still recommend seasonal clearing to avoid impacts to the Indiana bat and northern long-eared bat. Should the proposed project site contain trees ≥ 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 ≥ 3 inches dbh cannot be avoided, we recommend removal of any trees ≥ 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 <https://ecos.fws.gov/ecp/species/9045>), incidental take of Indiana bats is still prohibited without a project-specific exemption. Thus, seasonal clearing is recommended where Indiana bats are assumed present.

The project lies within the range of the bald eagle (*Haliaeetus leucocephalus*). Bald eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668-668d, BGEPA), which prohibits, among other things, the killing and disturbance of eagles.

Our database indicates there is at least one bald eagle nest within the vicinity of the project. Our database of nest locations may not be complete because new nests are built each year. Therefore, we recommend that the site and surrounding area be evaluated to determine if any eagle nests are present. In order to avoid take of bald eagles, we recommend that no tree clearing occur within 660 feet of a bald eagle nest or within any woodlot supporting a nest tree. Further we request that work within 660 feet of a nest or within the direct line-of-site of a

nest be restricted from January 15 through July 31. This will prevent disturbance of the eagles from the egg-laying period until the young fledge, which encompasses their most vulnerable times.

If these recommendations cannot be implemented and take of bald eagles is likely, a bald eagle take permit for this project may be necessary. Further information on eagle take permits can be found at: <https://www.fws.gov/story/do-i-need-eagle-take-permit>.

Please contact Jenny Finfera at jennifer_finfera@fws.gov if you have any questions.

Sincerely,

USFWS

From: Miller, Brian <brian.miller1@aecom.com>

Sent: Friday, October 7, 2022 3:35 AM

To: Ohio, FW3 <ohio@fws.gov>; Mike.Pettegrew@dnr.state.oh.us <Mike.Pettegrew@dnr.state.oh.us>

Cc: aruggiero@firstenergycorp.com <aruggiero@firstenergycorp.com>

Subject: [EXTERNAL] USFWS TAILS 03E15000-2020-TA-0471 and ODNR # 20-0890 Lakeview-Ottawa 138kV Line Reconductoring Project - Blanding and Eastern Massasauga Report

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To whom it concerns,

On behalf of American Transmission Systems, Inc. (ATSI), a FirstEnergy Company, Jeff Davis, an approved herpetologist, completed a Report – Blanding’s Turtle (*Emydoidea blandingii*) and Eastern Massasauga (*Sistrurus catenatus*) Habitat Survey Lakeview – Ottawa 138kV Line Reconducting Project on October 4, 2021 as part of the Lakeview – Ottawa 138kV Transmission Line Reconductoring Project. Based on Mr. Davis recommendations, potential suitable habitat was identified for Blanding’s Turtle and ATSI intends to adhere to limiting construction near the identified habitats to occur between November and March as well as attain Mr. Davis during construction to monitor activities to avoid incidental impacts to the listed species. Regarding the eastern massasauga, Mr. Davis identified that site records of the species present within the area is isolated to Lake Erie Islands and only one record was identified on the mainland that is over 50 years old. Therefore, Mr. Davis recommend no further consideration would be warranted due to absence of populations within the Project area. Therefore, ATSI would like to request your approval of the attached survey report and recommendations.

If you have any further questions, please let us know.

Brian J. Miller
Project Manager / Senior Ecologist

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EXHIBIT #13

Miller, Brian

To: Seymour, Megan
Cc: Ashfield, Patrice; Okajima, Jennifer Y
Subject: RE: [EXTERNAL] Re: RE: Bald Eagle Survey Requirements and Incidental Takes

From: Seymour, Megan <megan_seymour@fws.gov>
Sent: Tuesday, December 14, 2021 1:25 PM
To: Miller, Brian <brian.miller1@aecom.com>
Cc: Ashfield, Patrice <patrice_ashfield@fws.gov>; Okajima, Jennifer Y <jennifer_okajima@fws.gov>
Subject: [EXTERNAL] Re: RE: Bald Eagle Survey Requirements and Incidental Takes

Hello Brian,
Patrice asked me to follow up with you on this project. There appears to be one additional eagle nest about 0.4 miles east of the eastern end of the project, roughly at 41.5017496, -82.9094856.

In looking at the original shapefile provided for this project, the line (white line on map below) appears to end about 2.5 miles away from "eagle nest 3." Is that still the case? If it will extend closer to eagle nest 3, there are additional nests in the vicinity that may also be in proximity to the line. Please advise regarding the currently proposed extent of the line and I can provide additional coordinates for areas to scope out.



Sincerely,
Megan

Megan Seymour
Wildlife Biologist
U.S. Fish and Wildlife Service
Ohio Ecological Services Field Office
4625 Morse Rd., Suite 104
Columbus, OH 43230
614-416-8993 ext. 116 (office)
614-542-7502 (cell)

Miller, Brian

From: Miller, Brian
Sent: Thursday, September 1, 2022 3:59 PM
To: Seymour, Megan
Cc: aruggiero@firstenergycorp.com
Subject: RE: [EXTERNAL] Re: Re: Lakeview - Ottawa 138kV Transmission Line - Bald Eagle Nesting Survey

Megan,

As we are approaching the end of summer, we wanted to follow up with you regarding potential nest locations within proximity to the Project corridor. If new nest are identified, could you please provide their locations so FirstEnergy can review their minimization/avoidance measures for this Project and make adjustments, as necessary.

Thank you so much,

Brian J. Miller
Project Manager / Senior Ecologist

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From: Seymour, Megan <megan_seymour@fws.gov>
Sent: Tuesday, April 19, 2022 9:44 AM
To: Miller, Brian <brian.miller1@aecom.com>
Cc: aruggiero@firstenergycorp.com
Subject: [EXTERNAL] Re: Re: Lakeview - Ottawa 138kV Transmission Line - Bald Eagle Nesting Survey

Brian,

We will be getting updated bald eagle shapefiles from ODNR at the end of this summer. If you could check back with us after that, we will make sure there are no new nests within the corridor and that should be sufficient. The only reason that we are giving this project a little more scrutiny compared to some other of First Energy's projects is that there are so many bald eagle nests in this area of the state, and new ones being built each year.

Thanks much,
Megan

From: Miller, Brian <brian.miller1@aecom.com>
Sent: Monday, April 4, 2022 3:24 PM
To: Seymour, Megan <megan.seymour@fws.gov>; Ashfield, Patrice <patrice_ashfield@fws.gov>; Okajima, Jennifer Y <jennifer_okajima@fws.gov>
Cc: aruggiero@firstenergycorp.com <aruggiero@firstenergycorp.com>
Subject: RE: [EXTERNAL] Re: Lakeview - Ottawa 138kV Transmission Line - Bald Eagle Nesting Survey

Hi Megan,

I just wanted to follow up regarding the Lakeview-Ottawa 138kV Transmission Line Project and the email sent on March 22, 2022 (below).

Thanks,

Brian J. Miller
Project Manager / Senior Ecologist

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From: Miller, Brian
Sent: Tuesday, March 22, 2022 3:38 PM
To: Seymour, Megan <megan.seymour@fws.gov>; Ashfield, Patrice <patrice_ashfield@fws.gov>; Okajima, Jennifer Y <jennifer_okajima@fws.gov>
Cc: Kuehn, Michael <Michael.Kuehn@aecom.com>; aruggiero@firstenergycorp.com
Subject: RE: [EXTERNAL] Re: Lakeview - Ottawa 138kV Transmission Line - Bald Eagle Nesting Survey

Hi Megan,

I appreciate your guidance and responsiveness regarding the Project activities as well as coordination of the known eagle nesting sites located within proximity of the Project. After further review and coordination with land agents at FirstEnergy, the completion of a pedestrian survey within the recommended buffers (660-ft and 1,000-ft) was deemed not feasible due to challenges in obtaining property access permissions. As the Project is associated with an existing transmission line, access to the Project is typically confined to the transmission line corridor as well as areas of ingress and egress to the transmission line.

In consideration of these items above, FirstEnergy has been previously authorized by the USFWS to rely on the existing known locations provided by your agency without the need for additional pedestrian surveys. As you noted in our previous email coordination from February 16, 2022, the current avoidance/minimization measures implemented for this Project would avoid impacting the known nesting sites within the recommended buffers. Therefore, FirstEnergy would like to confirm that the following methods are an acceptable means of avoidance, in lieu of performing pedestrian surveys.

- FirstEnergy will coordinate with the USFWS prior to construction to receive updated shapefiles of known nesting locations within the Project area. If new nesting locations are identified, FirstEnergy will review, and update the minimization/avoidance plans as necessary. If avoidance/minimization is not deemed possible, FirstEnergy will coordinate further with your office.
- During construction, FirstEnergy will notify USFWS if any new nest areas are identified within the existing transmission line easements.

If you have any questions and/or concerns, please let us know regarding this revised approach.

Thank you,

Brian J. Miller
Project Manager / Senior Ecologist

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brian.miller1@aecom.com

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From: Seymour, Megan <megan_seymour@fws.gov>
Sent: Wednesday, February 16, 2022 3:44 PM
To: Miller, Brian <brian.miller1@aecom.com>; Ashfield, Patrice <patrice_ashfield@fws.gov>; Okajima, Jennifer Y <jennifer_okajima@fws.gov>
Cc: Kuehn, Michael <Michael.Kuehn@aecom.com>; aruggiero@firstenergycorp.com
Subject: [EXTERNAL] Re: Lakeview - Ottawa 138kV Transmission Line - Bald Eagle Nesting Survey

Brian,
Thank you for following up with us and providing the detailed project description and maps. Your proposed survey and avoidance/minimization measures are consistent with our previous recommendations. At this point we don't have any further comment. Please send me the survey results for review when they are ready.

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survey needs. So far this project seems straightforward and you have agreed to implement the avoidance/minimization measures. So unless something else comes up, we don't need to contact the bald eagle folks.

Thanks again,
Megan

Megan Seymour
Wildlife Biologist
U.S. Fish and Wildlife Service
Ohio Ecological Services Field Office
4625 Morse Rd., Suite 104
Columbus, OH 43230
614-416-8993 ext. 116 (office)
614-542-7502 (cell)

From: Miller, Brian <brian.miller1@aecom.com>
Sent: Tuesday, February 15, 2022 7:33 AM
To: Seymour, Megan <megan_seymour@fws.gov>; Ashfield, Patrice <patrice_ashfield@fws.gov>; Okajima, Jennifer Y <jennifer_okajima@fws.gov>
Cc: Kuehn, Michael <Michael.Kuehn@aecom.com>; aruggiero@firstenergycorp.com <aruggiero@firstenergycorp.com>
Subject: [EXTERNAL] Lakeview - Ottawa 138kV Transmission Line - Bald Eagle Nesting Survey

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Megan/Patrice/Jennifer,

As we are planning to complete the nest survey for bald eagles this March, I wanted to confirm our survey methods based on the construction activities occurring for this Project. Therefore, could you please review the attached construction access plan as well as a summary provided below with letting us know if you have any questions and/or require anything else.

Construction Activities

American Transmission Systems, Inc. (ATSI) is proposing to re-conductor the existing 138kV transmission line for 7.8 miles as two disconnected segments located in Bay, Portage, and Salem Townships, in Ottawa County, Ohio. The re-conducting includes replacement of the conduit along the existing transmission lines as well as a replacement of six existing wooden structures with steel monopole structures and modification/repair work occurring on eight existing wooden structures. All other structures were identified by the client as not requiring modifications and/or replacements. Due to the presence of large wetland complexes within the Project area, ATSI is proposing to access the structures that are not proposed for replacement and/or modification by helicopter or intends to walk in on foot to avoid disturbing the wetland complexes. These areas are noted on the attached map as "Green Square" as access by helicopter and "Yellow Squares" as access by foot. The access roads, work areas, and helipad locations are also displayed on the attached figure. Due to the potential nesting site provided by the USFWS, ATSI plans to avoid use of a helicopter within 1,000 feet of identified nesting locations.

Survey Methods

AECOM intends to complete a ground reconnaissance to identify bald eagle nesting locations located in suitable nesting habitat within 660 feet of the existing transmission line corridor where proposed ground activity (i.e., earth disturbance, clearing activities, structure replacements, and access roads/work areas) is proposed to occur for the Project. Additionally, the ground reconnaissance will also include inspections within 1,000 feet of the existing transmission line corridor where helicopter use is proposed. Ground reconnaissance will be performed during early March to coincide with the bald eagle incubation period in the region and conducted prior to leaf out conditions. This will provide optimal conditions for detecting bald eagle breeding and nesting activity at nest sites and detecting nests within the view shed. Upon identification of a potential nesting location, AECOM will document the location of the potential nest areas and collect data necessary to assign nest status as in-use or alternate and where possible as well as identify the nesting stage of occupied nests. Following the March 2022 survey, AECOM will provide the result for your review. As the construction for the Project is not proposed until 2023, AECOM will also complete an additional mobilization in early 2023 to confirm no additional nesting areas are present prior to construction.

Please let me know if you need anything else and/or we have confirmation with the survey boundaries identified above. Furthermore, it is our understanding that Tom Wittig is the USFWS eagle coordinator. Should we begin to include him on these emails and correspondences?

Thank you,

Brian J. Miller
Project Manager / Senior Ecologist

D +1-412-808-1844
M +1-412-667-9172
brian.miller1@aecom.com

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Miller, Brian

From: Seymour, Megan <megan_seymour@fws.gov>
Sent: Wednesday, September 21, 2022 2:08 PM
To: Miller, Brian
Cc: aruggiero@firstenergycorp.com
Subject: Re: Re: Re: Lakeview - Ottawa 138kV Transmission Line - Bald Eagle Nesting Survey

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Brian,

We have not received any new bald eagle nest information for Ohio from ODNR. The information we provided previously is still relevant.

Thank you for checking back in.

Best,

Megan

Megan Seymour

Wildlife Biologist

U.S. Fish and Wildlife Service

Ohio Ecological Services Field Office

4625 Morse Rd., Suite 104

Columbus, OH 43230

614-416-8993 ext. 116 (office)

614-542-7502 (cell)

From: Miller, Brian <brian.miller1@aecom.com>
Sent: Thursday, September 1, 2022 3:59 PM
To: Seymour, Megan <megan_seymour@fws.gov>
Cc: aruggiero@firstenergycorp.com <aruggiero@firstenergycorp.com>
Subject: RE: [EXTERNAL] Re: Re: Lakeview - Ottawa 138kV Transmission Line - Bald Eagle Nesting Survey

Megan,

As we are approaching the end of summer, we wanted to follow up with you regarding potential nest locations within proximity to the Project corridor. If new nest are identified, could you please provide their locations so FirstEnergy can review their minimization/avoidance measures for this Project and make adjustments, as necessary.

Thank you so much,

Brian J. Miller

Project Manager / Senior Ecologist

M +1-412-667-9172
brian.miller1@aecom.com

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From: Seymour, Megan <megan_seymour@fws.gov>
Sent: Tuesday, April 19, 2022 9:44 AM
To: Miller, Brian <brian.miller1@aecom.com>
Cc: aruggiero@firstenergycorp.com
Subject: [EXTERNAL] Re: Re: Lakeview - Ottawa 138kV Transmission Line - Bald Eagle Nesting Survey

Brian,
We will be getting updated bald eagle shapefiles from ODNR at the end of this summer. If you could check back with us after that, we will make sure there are no new nests within the corridor and that should be sufficient. The only reason that we are giving this project a little more scrutiny compared to some other of First Energy's projects is that there are so many bald eagle nests in this area of the state, and new ones being built each year.
Thanks much,
Megan

From: Miller, Brian <brian.miller1@aecom.com>
Sent: Monday, April 4, 2022 3:24 PM
To: Seymour, Megan <megan_seymour@fws.gov>; Ashfield, Patrice <patrice_ashfield@fws.gov>; Okajima, Jennifer Y <jennifer_okajima@fws.gov>
Cc: aruggiero@firstenergycorp.com <aruggiero@firstenergycorp.com>
Subject: RE: [EXTERNAL] Re: Lakeview - Ottawa 138kV Transmission Line - Bald Eagle Nesting Survey

Hi Megan,

I just wanted to follow up regarding the Lakeview-Ottawa 138kV Transmission Line Project and the email sent on March 22, 2022 (below).

Thanks,

Brian J. Miller
Project Manager / Senior Ecologist

M +1-412-667-9172
brian.miller1@aecom.com

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From: Miller, Brian
Sent: Tuesday, March 22, 2022 3:38 PM
To: Seymour, Megan <megan_seymour@fws.gov>; Ashfield, Patrice <patrice_ashfield@fws.gov>; Okajima, Jennifer Y <jennifer_okajima@fws.gov>
Cc: Kuehn, Michael <Michael.Kuehn@aecom.com>; aruggiero@firstenergycorp.com
Subject: RE: [EXTERNAL] Re: Lakeview - Ottawa 138kV Transmission Line - Bald Eagle Nesting Survey

Hi Megan,

I appreciate your guidance and responsiveness regarding the Project activities as well as coordination of the known eagle nesting sites located within proximity of the Project. After further review and coordination with land agents at FirstEnergy, the completion of a pedestrian survey within the recommended buffers (660-ft and 1,000-ft) was deemed not feasible due to challenges in obtaining property access permissions. As the Project is associated with an existing transmission line, access to the Project is typically confined to the transmission line corridor as well as areas of ingress and egress to the transmission line.

In consideration of these items above, FirstEnergy has been previously authorized by the USFWS to rely on the existing known locations provided by your agency without the need for additional pedestrian surveys. As you noted in our previous email coordination from February 16, 2022, the current avoidance/minimization measures implemented for this Project would avoid impacting the known nesting sites within the recommended buffers. Therefore, FirstEnergy would like to confirm that the following methods are an acceptable means of avoidance, in lieu of performing pedestrian surveys.

- FirstEnergy will coordinate with the USFWS prior to construction to receive updated shapefiles of known nesting locations within the Project area. If new nesting locations are identified, FirstEnergy will review, and update the minimization/avoidance plans as necessary. If avoidance/minimization is not deemed possible, FirstEnergy will coordinate further with your office.
- During construction, FirstEnergy will notify USFWS if any new nest areas are identified within the existing transmission line easements.

If you have any questions and/or concerns, please let us know regarding this revised approach.

Thank you,

Brian J. Miller
Project Manager / Senior Ecologist

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From: Seymour, Megan <megan_seymour@fws.gov>
Sent: Wednesday, February 16, 2022 3:44 PM
To: Miller, Brian <brian.miller1@aecom.com>; Ashfield, Patrice <patrice_ashfield@fws.gov>; Okajima, Jennifer Y <jennifer_okajima@fws.gov>
Cc: Kuehn, Michael <Michael.Kuehn@aecom.com>; aruggiero@firstenergycorp.com
Subject: [EXTERNAL] Re: Lakeview - Ottawa 138kV Transmission Line - Bald Eagle Nesting Survey

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To: Seymour, Megan <megan_seymour@fws.gov>; Ashfield, Patrice <patrice_ashfield@fws.gov>; Okajima, Jennifer Y

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Please let me know if you need anything else and/or we have confirmation with the survey boundaries identified above. Furthermore, it is our understand that Tom Wittig is the USFWS eagle coordinator. Should we begin to include him on these emails and correspondences?

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Case No(s). 22-0967-EL-BLN

Summary: Letter of Notification Application (Part 1 of 7) electronically filed by Mr. Christopher K. Riedel on behalf of American Transmission Systems Incorporated