

LETTER OF NOTIFICATION FOR

**The Dayton Power and Light
Company d/b/a AES Ohio**

**Amsterdam Substation Expansion Project
PUCO Case No. 22-0834-EL-BLN**

Submitted to:

The Ohio Power Siting Board

Pursuant to OAC 4906-06

Submitted by:

AES Ohio

December 2022



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Letter of Notification

This Letter of Notification has been prepared by The Dayton Power and Light Company d/b/a AES Ohio ("AES Ohio") in accordance with Ohio Administrative Code (OAC) Section 4906-6-05 for the review of Accelerated Certificate Applications for the AES Ohio Amsterdam Substation Expansion Project (the "Project"). The following section corresponds to the administrative code sections for the requirements of a Letter of Notification.

4906-6-05(B) GENERAL INFORMATION

4906-6-05(B)(1) Project Description

The name of the project and applicant's reference number, names and reference number(s) of resulting circuits, a brief description of the project, and why the project meets the requirements for a Letter of Notification application.

Name of Project:

Amsterdam Substation Expansion Project

Reference Numbers:

PUCO Filing Number: The Project has been assigned Public Utilities Commission of Ohio (PUCO) Case Number 22-0834-EL-BLN.

Circuit Reference: The Project is associated with the existing Amsterdam – Shelby 138kV circuit and future Amsterdam – West Moulton 138kV circuit.

Brief Description of the Project:

AES Ohio is proposing the expansion of the current Amsterdam Substation (the "Project"), located in German Township, Auglaize County, Ohio. The Project will expand the substation yard by installing a second 138/69 kilovolt ("kV") transformer and replacing an existing 138/69kV transformer with a new 138/69kV transformer at the Amsterdam Substation. This will also require the addition of four 138kV and two 69kV breakers to establish two ring buses, replacing two breakers with new circuit breakers, and replacing the existing 22.5 megavolt amps ("MVAR") capacitor with two new 16 MVAR capacitors.

Letter of Notification Requirement:

This Project qualifies as a Letter of Notification filing because it meets the requirements of OAC 4906-1-01, Appendix A, item (4)(b), *Application Requirement Matrix for Electric Power Transmission Lines*:

- 4. Constructing additions to existing electric power transmission station or converting distribution stations to transmission stations where:*
(b) There is a greater than twenty percent expansion of the fenced area.

4906-6-05(B)(2) Statement of Need

If the proposed project is an electric power transmission line or gas or natural gas transmission line, a statement explaining the need for the proposed facility.

The Project is part of area-wide transmission improvements that will improve service and reliability to meet the requirements of Honda Development and Manufacturing of America (HDMA), as well as strengthen the underlying transmission network in the North Dayton area. The existing Amsterdam substation will be expanded to include the new Amsterdam – West Moulton 138kV line and the existing Amsterdam – Shelby line in a ring bus arrangement. Also, it will replace the existing Amsterdam transformer and add a second 138/69kV transformer to the substation to ensure redundancy for the 138kV source being added to the area. The 69kV bus will be reconfigured to a ring bus arrangement to help reduce exposure to misoperation, improve reliability, and increase operational flexibility. This improvement will provide operational flexibility, increased reliability, and capacity to reinforce the transmission system in the North portion of our service territory.

The Project Need was presented to PJM on 3/19/2020 and the Solution on 10/16/2020 and 3/9/2021. The assigned PJM number is: s2398.4. It is included in AES Ohio's 2022 LTFR, Form FE-T10, page 139

4906-6-05(B)(3) Project Location

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

The Project is located at the existing Amsterdam Substation in German Township, within Auglaize County. A site map of the Project is provided in Attachment A, Figures. Figure 1 shows the general Project vicinity depicted on a USGS quadrangle topographic map. Figure 2 depicts the substation expansion location, compared to current Amsterdam Substation location and additional details depicted on an aerial imagery map.

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

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

The entire Project will take place within existing AES property, so no alternatives were considered. The socioeconomic, ecological, and land use assessments are further discussed in Section 4906-6-05(B)(10).

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

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

The Project will occur entirely within existing AES Ohio property. Landowners with property within the Project area and parcels abutting affected properties will be sent a letter by AES Ohio providing information about the proposed facility and timeframe for the construction and

restoration activities. Information on the ongoing status of this Project and other AES Ohio transmission projects can be found at the following website: <https://www.aes-ohio.com/transmission-improvements>. A copy of the LON will be provided to the chief executive officer of the county and township and the head of relevant public agencies whose duties include the environmental protection or land use planning in the area where the Project is located. A copy of the LON will also be provided to the New Bremen Public Library.

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

The applicant shall provide an anticipated construction schedule and proposed in-service date of the project.

Construction activities associated with the Project are planned to begin approximately on March 15, 2024 and anticipated to be completed by March 31, 2025.

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

The applicant shall provide a map of at least 1:24,000 scale clearly depicting the facility with clearly marked streets, roads, and highways, and an aerial image.

Attachment A – Figure depicts the general location of the Project. Figure 1 shows the general Project vicinity depicted on a USGS quadrangle topographic map. Figure 2 shows the planned transmission line location and additional details depicted on an aerial imagery map.

4906-6-05(B)(8) Property Agreements

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

The Project is located entirely within existing AES Ohio property.

4906-6-05(B)(9) Technical Features

The applicant shall describe the following information regarding the technical features of the project:

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

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

The equipment and facilities to be installed within the Project will include the following:

- The replacement of a 138/69kV transformer with a new 138/69kV transformer
- Installation of a second new 138/69 kV transformer
- Installation of four 138kV circuit breakers and two 69kV circuit breakers to form two ring configurations and replacing two existing breakers with new circuit breakers
- replacing the existing 22.5 megavolt amps (“MVAR”) capacitor with two new 16 MVAR capacitors.
- Substation fence expansion by approximately 1.7 acres

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

For electric power transmission lines that are within one hundred feet of an occupied residence or institution, the production of electric and magnetic fields during the operation of the proposed electric power transmission line.

No residences or institutions are located within 100 feet of the Project; therefore, no Electric and Magnetic Field (EMF) studies are required.

4906-6-05(B)(9)(b)(i) Calculated Electric and Magnetic Field Levels

Calculated electric and magnetic field strength levels at one meter above ground under the lowest conductors and at the edge of the right-of-way.

No residences or institutions are located within 100 feet of the Project; therefore, no EMF calculation studies are required.

4906-6-05(B)(9)(b)(ii) Design Alternatives for EMF

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

No residences or institutions are located within 100 feet of the Project; therefore, no design alternatives were considered.

4906-6-05(B)(9)(c) Project Cost

The estimated capital cost of the project.

The estimated capital cost of the Project is \$7.03 million.

4906-6-05(B)(10) Social and Ecological Impacts

The applicant shall describe the social and ecological impacts of the project:

4906-6-05(B)(10)(a) Land Use Characteristics

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

The Project is located in German Township, within Auglaize County, Ohio. The Project provides increased reliability of the energy network as well as meeting regulatory standards to serve electricity to homes, schools, hospitals and businesses in the area. The Project is located within existing AES Ohio property.

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

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

The Project will be constructed on agricultural lands and thus have some incremental effects. Approximately 2.5 acres of the Project's LOD are within agricultural areas. The Project will not take place on agricultural district land.

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

Provide a description of the applicant's investigation concerning the presence or absence of significant archaeological or cultural resources that may be located within the potential disturbance area of the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.

The Ohio History Connection, Ohio's Historic Preservation Office (OHPO) online mapping system, was consulted to identify previously recorded cultural resources within 0.8 kilometer (0.5 mile) of the Project Area (the Study Area). This preliminary records check revealed that no archaeological resources have been identified within the Study Area. However, four historic structures (AUG0102113, AUG0041713, AUG0103413, and AUG0042613) are mapped within the Project's review area. Two of the four historic structures, FG Moeller House/Bill Babb House (OHI# AUG0041713) and William Wellman House/W. Tangeman House (AUG0042613) are unevaluated for National Register of Historic Places (NRHP) eligibility. The remaining two historic structures are not eligible for listing in the NRHP: Lewis Kettler Brick House/Kermit Free (AUG0102113) and William Koop House/Allen Imwalle House (AUG0103413). None of the four previously recorded historic structures are mapped within or immediately adjacent to the Project.

Two prior cultural resources surveys have been conducted within the Study Area: *Letter Report: Aug-Minster/New Bremen Bikeway (PID 15139), Jackson and German Townships, Auglaize County, Ohio* (NADB 12649) and *Literature Review and Phase I Cultural Resources Survey for the AUG-Minster New Bremen Walk Path Phase II in German and Jackson Townships, Auglaize County, Ohio (PID 21081)* (NADB 14795). Neither prior survey was conducted within the Project footprint.

Based on this review, the previously recorded historic structures that are unevaluated for NRHP eligibility (FG Moeller House/Bill Babb House [OHI# AUG0041713] and William Wellman House/W. Tangeman House [AUG0042613]) will not be affected as the buildings and the properties do not intersect the current Project alignment. No viewshed issues will occur, as the Project involves the expansion of an existing substation. The four previously recorded historic structures will not be affected by the Project. Should state or federal permitting become necessary, additional coordination with the OHPO may be required for the Project. Refer to Attachment B – Cultural Resources Review Figures.

4906-6-05(B)(10)(d) Local, State, and Federal Agency Correspondence

Provide a list of the local, state, and federal governmental agencies known to have requirements that must be met in connection with the construction of the project, and a list of documents that have been or are being filed with those agencies in connection with siting and constructing the project.

The anticipated environmental permits and authorizations for the Project are summarized in the table below.

Agency	Approval/ Clearance/ Authorization	Agency Review Time	Comments
USACE – Huntington District	Clean Water Act Section 404 Nationwide Permit #57 – Electric Utility	N/A	Wetlands, streams, and other regulated waters were delineated within the Project Area on July 21, 2022. No wetlands or streams were identified

	Line and Telecommunications Activities		within the Project Area. There are no section 10 waterbodies, national/wild/scenic rivers, or waters of special concern in the Project area, and the Project is not located in a listed township per NWP Regional General Condition 5.
U.S. Fish and Wildlife Service (USFWS)	Federally Listed Threatened or Endangered Species or Critical Habitat Review	N/A	Correspondence with the USFWS was initiated on August 16, 2022 and a response was received on August 17, 2022 which described any rare, threatened, or endangered species within the Study Area vicinity. This correspondence is further discussed in Sections 4906-6-05(B)(10)(e) of this LON. The Response Letter is found in Attachment C.
Ohio Department of Natural Resources (ODNR) Office of Real Estate	Areas of Ecological Concern Review	60 Days	Correspondence with ODNR was initiated on August 15, 2022 and a response was received on September 9, 2022 which described any areas of ecological concern within one mile of the Project area. This correspondence is further discussed in Sections 4906-6-05(B)(10)(e) and 4906-6-05(B)(10)(f) of this LON. The Response Letter is found in Attachment C.
Ohio Historic Preservation Office (OHPO)	Archaeological and Cultural Resources Review	30 Days	The Ohio History Connection, OHPO online mapping system was consulted on August 30, 2022 to identify previously record cultural resources with 0.5 mile of the Project area (the Study Area). No archaeological resources have been identified within the Study Area, four historic structures are mapped within the Project's review area, and two prior cultural resources surveys have been conducted within the Study Area. Based on this review, none of the above resources will be affected and no viewshed issues will occur as the Project involves the expansion of an existing substation. Refer to Attachment B – Cultural Resources Review Figures.
Ohio Environmental Protection Agency (OEPA)	Clean Water Act Section 401 Review	N/A	Currently, the USACE has determined that the OEPA will waive all 401 certifications, thus the USACE is not requiring 401 water quality certifications for the sixteen modified or new NWPs in Ohio which includes NWP 57.
	National Pollutant Discharge Elimination System (NPDES)	NOI submitted 21 days prior to start	The total disturbance for the Project is anticipated to be greater than one acre, thus coverage under this permit is required.

	Construction Site General Permit Notice of Intent (NOI)	of construction	
Auglaize County Engineer's Office	Road Right-Of-Way Permit	N/A	A road right-of-way permit is required for this Project since some construction for this Project will disturb the road right-of-way on Auglaize County-maintained roadways.
	Longitudinal Permit	N/A	A longitudinal permit is required for this Project if aboveground and belowground installations will occur within the right-of-way and along the side of Auglaize County roads.
German Township	Road Right-of-Way Permit	N/A	A road right-of-way permit is required for this Project since some construction for this Project will disturb the road right-of-way on German Township-maintained roadways.

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

Provide a description of the applicant's investigation concerning the presence or absence of federal and state designated species (including endangered species, threatened species, rare species, species proposed for listing, species under review for listing, and species of special interest) that may be located within the potential disturbance area of the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.

Coordination with the U.S. Fish and Wildlife Service (USFWS) was initiated on August 16, 2022 in an effort to identify the Project's potential effect on any federally listed threatened or endangered species or critical habitat within a one-mile radius of the Study Area. A response from the USFWS was received August 17, 2022 regarding rare, threatened, and endangered (RTE) species located within the Study Area vicinity. The response from the USFWS indicated the federally listed endangered Indiana bat (*Myotis sodalis*) and threatened northern long-eared bat (*Myotis septentrionalis*) occur throughout the state of Ohio. Any required tree clearing associated with the Project is proposed to be implemented during the seasonal tree cutting window (clearing of trees ≥ 3 inches diameter at breast height between October 1 and March 31) to avoid impacts to the federally listed bat species. Therefore, no adverse effects to any federally endangered, threatened, proposed or candidate species are expected to occur. An IPaC resource list analysis was also performed and a report of species and critical habitat within a 0.5-mile radius of the Project was generated. The IPaC report also indicated that the two bat species, the Indiana bat (federally listed endangered species) and the northern long-eared bat (federally listed threatened species) can be found in or near the Project area. Any required tree clearing associated with the Project is proposed to be implemented during the seasonal tree cutting window (clearing of trees ≥ 3 inches diameter at breast height between October 1 and March 31) to avoid impacts to the federally listed bat species. Therefore, no adverse effects to any federally endangered, threatened, proposed or candidate species are expected to occur. Additionally, the IPaC report indicated one insect, the Monarch Butterfly (*Danaus plexippus*, federally listed candidate species), can be found in or near the Project area. Monarch Butterflies lay their eggs on milkweed host plants; given the habitat types within the Project area and the fact that the Project will occur entirely in existing AES Ohio substation property, the Project activities are not likely to impact these species. A copy of the USFWS response can be found in Attachment C – Rare, Threatened, and Endangered Species Correspondence.

Additionally, coordination with the Ohio Department of Natural Resources (ODNR) was initiated on August 15, 2022 to identify the Project's effect on any state listed threatened or endangered species within a 0.5-mile radius of the Project. A response from the ODNR Division of Wildlife (DOW) was received on September 9, 2022 regarding RTE species located within a 0.5-mile radius of the Project. ODNR DOW noted in their response letter that the entire state of Ohio is within the range of the Indiana bat (state endangered and federally endangered species), the northern long-eared bat (state endangered and federally threatened species), the little brown bat (*Myotis lucifugus*, state endangered species), and the tricolored bat (*Perimyotis subflavus*, state endangered species). As recommended by ODNR, a desktop habitat assessment was performed using the current USFWS "Range Wide Indiana Bat Survey Guidelines" to determine if a potential bat hibernaculum is present within the Project area. The desktop assessment, using ODNR's Mines of Ohio map, revealed no existing caves or abandoned mines within 0.25 miles of the Project. Additionally, ODNR DOW noted that the Project is within the range of the clubshell (*Pleurobema clava*, state and federally endangered mussel species), the pondhorn (*Uniomerus tetralasmus*, state threatened mussel species), the pirate perch (*Aphredoderus sayanus*, state endangered fish species), the pugnose minnow (*Opsopoeodus emiliae*, state endangered fish species) and the greater redhorse (*Moxostoma valenciennesi*, state threatened fish species). No wetlands or streams were identified within the Project area. The Project area was also reported to be within the range of the northern harrier (*Circus hudsonis*, state endangered bird species); however, due to the location, the type of habitat within the Project area, and the type of work proposed, ODNR indicates the Project is not likely to impact these species. A copy of the ODNR response can be found in Attachment C – Rare, Threatened, and Endangered Species Correspondence.

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

Provide a description of the applicant's investigation concerning the presence or absence of areas of ecological concern (including national and state forests and parks, floodplains, wetlands, designated or proposed wilderness areas, national and state wild and scenic rivers, wildlife areas, wildlife refuges, wildlife management areas, and wildlife sanctuaries) that may be located within the potential disturbance area of the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.

GAI also conducted an investigation for areas of ecological concern. As a part of GAI's investigation, a request was submitted to the ODNR Natural Heritage Program on August 15, 2022, to research the presence of any unique ecological sites, geological features, animal assemblages, scenic rivers, state wildlife areas, nature preserves, parks or forest, national wildlife refuges, or other protected areas within one mile of the Project area, using the ODNR Natural Heritage Database (NHD). A response from the ODNR – Office of Real Estate was received on September 9, 2022. According to the NHD no records of state or federally listed plants or animals are within one mile of the Project area. A copy of the ODNR response can be found in Attachment C – Rare, Threatened, and Endangered Species Correspondence.

As a part of the field investigation and ecological assessment, GAI conducted a regulated waters delineation within the Project Area. GAI's investigation included an approximately 6.7-acre study area of the proposed substation expansion. No streams or wetlands were identified within the study areas. Results from GAI's field investigation can be found in Attachment D – Regulated Waters Assessment (RWA). A review of the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRM) revealed that the Project Area does not cross any 100-year floodplains.

4906-6-05(B)(10)(g) Unusual Conditions

Provide any known additional information that will describe any unusual conditions resulting in significant environmental, social, health, or safety impacts.

To the best of AES Ohio's knowledge, no unusual conditions exist that would result in environmental, social, health, or safety impacts. Construction and operation of the Project will meet all applicable safety standards established by the Occupational Safety and Health Administration and will be in accordance with the requirements specified in the latest revision of the National Electric Code as adopted by the PUCO.

4906-6-08: Public Notice for Letter of Notification Applications

Within seven days of the filing of a Letter of Notification application, the applicant shall give public notice in newspapers of general circulation in the project area and shall supply the board with proof of such publication no later than 30 days from the date of publication. The applicant is permitted to correct any inadvertent failure of service or publication, provided substantial compliance with these requirements is met. The notice shall occupy not less than one-fourth of each newspaper's standard page, with letters not less than ten-point type and shall bear the heading "Notice of Proposed Major Utility Facility" in bold letters not less than one-fourth inch high or thirty-point type.

A newspaper notice will be provided in the Evening Leader within 7 days of filing this application, consisting of no less than a fourth of a standard page. Similarly, proof of publication within 30 days of the date of publication will be provided. Within seven days of filing this LON, notice will be sent to each property owner and tenant affected by the Project as well as landowners and tenants abutting parcels affected by the Project. This notice will include a description of the Project, a map showing the location and layout of the Project, the location of where accessible copies of this LON are available, and a statement including the assigned docket number that this LON is now pending before the board. This letter will also describe how to participate and comment in the board's proceedings.

Additionally, along with OPSB filing a copy of this LON will be provided to the public officials, departments, and agencies of Auglaize County and German Township that are listed below. A copy of the LON has also been provided to the New Bremen Public Library listed below for public viewing.

Auglaize County

Mr. David Bambauer, Mr. Doug Spencer, Mr. John Bergman, Ms. Erica L. Preston,
and Ms. Esther Leffel

Auglaize County Board of Commissioners
209 S. Blackhoof Street
Room 201
Wapakoneta, OH 45895

Mr. Andrew Baumer, P.E., P.S.
Auglaize County Engineer
1014 S. Blackhoof Street
P.O. Box 59
Wapakoneta, OH 45895

New Bremen Public Library
45 S. Washington Street
New Bremen, OH 45869

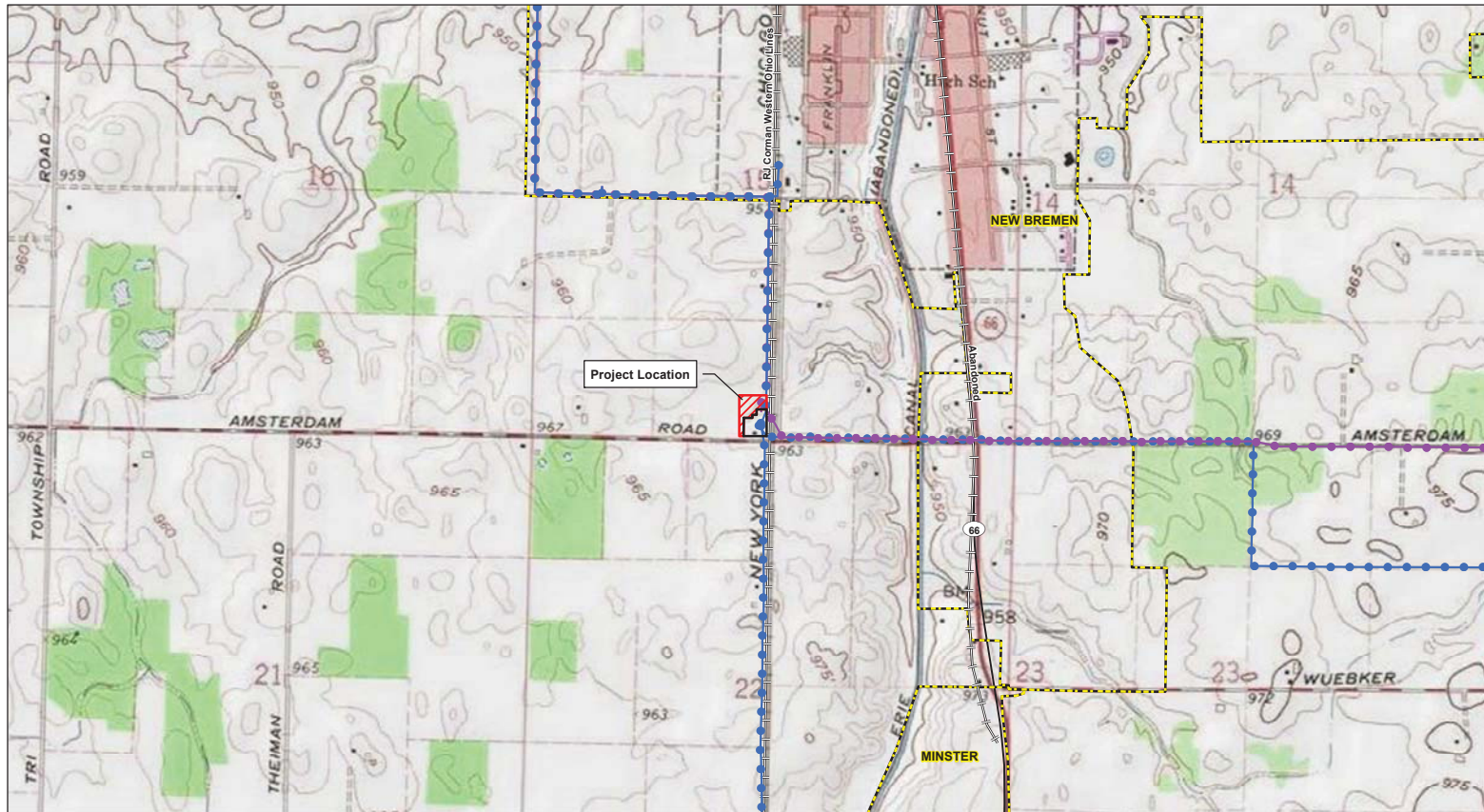
German Township

Mr. David Albers
German Township Trustee
06727 CR 66A
New Bremen, OH 45869

Mr. Robert Heitkamp
German Township Trustee
467 Canal Street
New Bremen, OH 45869

Mr. Vernon Paul
German Township Trustee
419 S. Canal Street
New Bremen, OH 45865

Attachment A – Figures



PROJECT LOCATION



AUGLAIZE
COUNTY, OH

REFERENCE:
TOPOGRAFC MAP
Early USA Top Map, Accessed: 11/29/2022.
RAILROAD
Ohio Department of Transportation's Railroads, 2/29/2020.
INTERSTATE AND HIGHWAY
Early U.S. Map Series, 5/10/2019.
INCORPORATED AREA
Public Utilities Commission of Transportation's Cited, 9/1/2018.
PROJECT DETAILS:
AES Ohio.

- State Highway
- Railway
- Incorporated Area
- Amsterdam Existing Substation
- Proposed Substation Expansion
- Existing 69kV Transmission Line
- Existing 138kV Transmission Line

aes Ohio



gis consultants

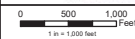
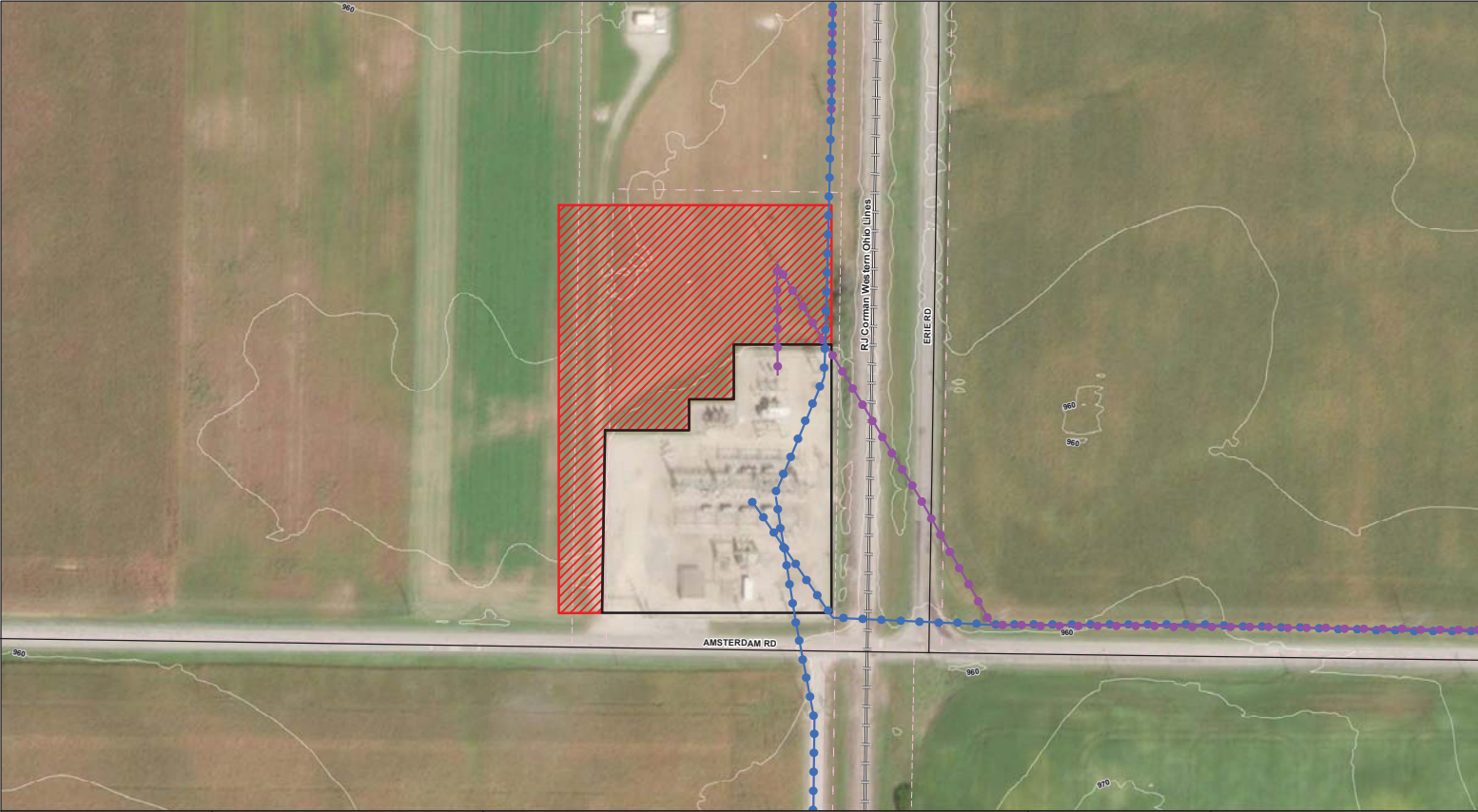


FIGURE 1
PROJECT LOCATION
Ohio Power Siting Board Letter of Notification
Amsterdam Substation Expansion Project

DRAWN BY: MBH
CHECKED: TDB
DATE: 11/29/2022
APPROVED: MRW

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PROJECT LOCATION

AUGLAIZE
COUNTY, OH

REFERENCE:
AERIAL PHOTOGRAPHY:
Satellite Imagery 2020, Accessed: 11/29/2022.
ROADWAY:
Ohio Department of Transportation's Roadways, 2/29/2020.
HIGHWAY:
FEDERAL U.S. Major Roads, 5/15/2019.
LOCAL ROAD:
Ohio Department of Transportation's Roads, 1/27/2021.
PARCEL BOUNDARY:
S-PT COATED FROM AUGLAIZE COUNTY GIS WEBSITE, 10/25/2022.
5-FOOT CONTOUR:
Ohio Geographic Referenced Information Program (OGRIP), Auglaize County, 2007.
DETAILED FEATURES:
GSI Consultants
PROJECT DETAILS:
AES Ohio.

Local Road	Amsterdam Existing Substation	Parcel Boundary
Railway	Proposed Substation Expansion	5-Foot Contour
	Existing 69kV Transmission Line	
	Existing 138kV Transmission Line	

aes Ohio

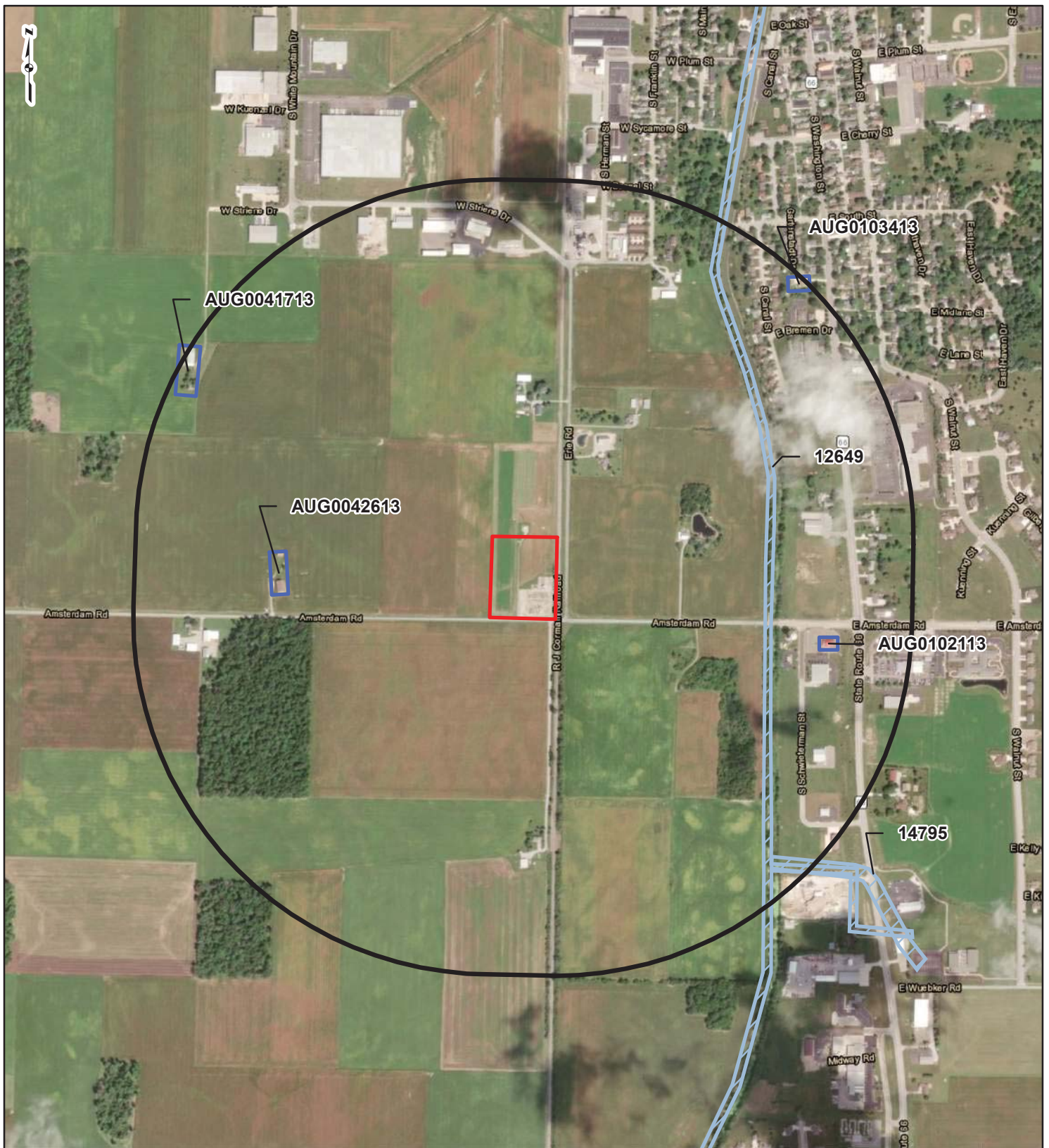
gis consultants

0 50 100 Feet
1 in = 100 feet

FIGURE 2
PROJECT LAYOUT
Ohio Power Siting Board Letter of Notification
Amsterdam Substation Expansion Project

DRAWN BY: MBH
CHECKED: TDB
DATE: 11/29/2022
APPROVED: MRW

Attachment B – Cultural Resources Review Figures



PROJECT LOCATION



AUGLAIZE COUNTY, OHIO

LEGEND

- Area of Potential Effect
- Previously Surveyed Area
- Previously Recorded Architectural Resource
- 0.5-Mile Background Research Corridor

0 500 1,000 2,000
Feet

FIGURE 1 BACKGROUND RESEARCH RESULTS



AMSTERDAM SUBSTATION
EXPANSION PROJECT
AES OHIO



DRAWN BY: AJW

DATE: 8/29/2022

CHECKED: TDB

APPROVED: ANH

REFERENCE: ESRI WORLD IMAGERY, PROVIDED BY VIVID - MAXAR, 2018, AND WORLD TRANSPORTATION, OBTAINED THROUGH ESRI ARCGIS ONLINE, © 2012 ESRI, DeLORME, NAVTEQ, TOMTOM, ACCESSED 08/2022.

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Attachment C – Rare, Threatened, and Endangered Species
Correspondence

United States Department of the Interior



FISH AND WILDLIFE SERVICE

Ecological Services
4625 Morse Road, Suite 104
Columbus, Ohio 43230
(614) 416-8993 / FAX (614) 416-8994



August 17, 2022

Project Code: 2022-0074721

Dear Ms. Bezold:

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

Federally Threatened and Endangered Species: Due to the project type, size, location, and the proposed implementation of seasonal tree cutting (clearing of trees ≥ 3 inches diameter at breast height between October 1 and March 31) to avoid impacts to the endangered Indiana bat (*Myotis sodalis*) and threatened northern long-eared bat (*Myotis septentrionalis*), we do not anticipate adverse effects to any other federally endangered, threatened, or proposed species, or proposed or designated critical habitat. Should the project design change, or additional information on listed or proposed species or their critical habitat become available, or if new information reveals effects of the action that were not previously considered, coordination with the Service should be initiated to assess any potential impacts.

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

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

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

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 Ashfield", with a stylized flourish at the end.

Patrice Ashfield
Field Office Supervisor



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ohio Ecological Services Field Office

4625 Morse Road, Suite 104

Columbus, OH 43230-8355

Phone: (614) 416-8993 Fax: (614) 416-8994



In Reply Refer To:

August 15, 2022

Project Code: 2022-0074721

Project Name: GAI Consultants - AES Ohio - Amsterdam Substation Expansion Project

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2) (c)). For projects other than major construction activities, the Service suggests that a biological

evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts see <https://www.fws.gov/birds/policies-and-regulations.php>.

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures see <https://www.fws.gov/birds/bird-enthusiasts/threats-to-birds.php>.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit <https://www.fws.gov/birds/policies-and-regulations/executive-orders/e0-13186.php>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Ohio Ecological Services Field Office

4625 Morse Road, Suite 104

Columbus, OH 43230-8355

(614) 416-8993

Project Summary

Project Code: 2022-0074721

Project Name: GAI Consultants - AES Ohio - Amsterdam Substation Expansion Project

Project Type: Transmission Line - New Constr - Above Ground

Project Description: The project involves the expansion of the existing Amsterdam Substation by approximately 2.0-acres to the north and west.

Project Location:

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@40.42313155,-84.38707141278638,14z>



Counties: Auglaize County, Ohio

Endangered Species Act Species

There is a total of 3 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Note that 1 of these species should be considered only under certain conditions.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

Mammals

NAME	STATUS
Indiana Bat <i>Myotis sodalis</i> There is final critical habitat for this species. The location of the critical habitat is not available. Species profile: https://ecos.fws.gov/ecp/species/5949	Endangered
Northern Long-eared Bat <i>Myotis septentrionalis</i> No critical habitat has been designated for this species. This species only needs to be considered under the following conditions: <ul style="list-style-type: none"> Incidental take of the northern long-eared bat is not prohibited at this location. Federal action agencies may conclude consultation using the streamlined process described at https://www.fws.gov/midwest/endangered/mammals/nleb/s7.html Species profile: https://ecos.fws.gov/ecp/species/9045	Threatened

Insects

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9743	Candidate

Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

IPaC User Contact Information

Agency: GAI Consultants, Inc.
Name: Tyler Rankin
Address: 11 Spiral Drive
Address Line 2: Suite 8
City: Florence
State: KY
Zip: 41048
Email: t.rankin@gaiconsultants.com
Phone: 8592120226



Ohio Department of Natural Resources

MIKE DEWINE, GOVERNOR

MARY MERTZ, DIRECTOR

Office of Real Estate

John Kessler, Chief

2045 Morse Road – Bldg. E-2

Columbus, OH 43229

Phone: (614) 265-6621

Fax: (614) 267-4764

September 9, 2022

Marie G. Bezold
GAI Consultants
11 Spiral Drive, Suite 8
Florence, KY 41042

Re: 22-0814; AES Ohio Amsterdam Substation Expansion Project

Project: The proposed project involves the expansion of the existing Amsterdam Substation by approximately 2.0-acres to the north and west.

Location: The proposed project is located in German Township, Auglaize 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: A review of the Ohio Natural Heritage Database indicates there are no records of state or federally listed plants or animals within one mile of the specified project area. Records searched date from 1980.

Please note that Ohio has not been completely surveyed and we rely on receiving information from many sources. Therefore, a lack of records for any particular area is not a statement that rare species or unique features are absent from that area.

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 entire state of Ohio is within the range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species, the northern long-eared bat (*Myotis septentrionalis*), a state endangered and federally threatened species, the little brown bat (*Myotis lucifugus*), a state endangered species, and the tricolored bat (*Perimyotis subflavus*), a state endangered species. During the spring and summer (April 1 through September 30), these species of bats predominately roost in trees behind loose, exfoliating bark, in crevices and cavities, or in the

leaves. However, these species are also dependent on the forest structure surrounding roost trees. If trees are present within the project area, and trees must be cut, the DOW recommends cutting only occur from October 1 through March 31, conserving trees with loose, shaggy bark and/or crevices, holes, or cavities, as well as trees with DBH ≥ 20 if possible. If trees are present within the project area, and trees must be cut during the summer months, the DOW recommends a mist net survey or acoustic survey be conducted from June 1 through August 15, prior to any cutting. Mist net and acoustic surveys should be conducted in accordance with the most recent version of the "[OHIO DIVISION OF WILDLIFE GUIDANCE FOR BAT SURVEYS AND TREE CLEARING](#)". If state listed bats are documented, DOW recommends cutting only occur from October 1 through March 31. However, limited summer tree cutting may be acceptable after consultation with the DOW (contact Eileen Wyza at Eileen.Wyza@dnr.ohio.gov).

The DOW also recommends that a desktop habitat assessment is conducted, followed by a field assessment if needed, to determine if a potential hibernaculum is present within the project area. Direction on how to conduct habitat assessments can be found in the current USFWS "[RANGE-WIDE INDIANA BAT & NORTHERN LONG-EARED BAT SURVEY GUIDELINES](#)." If a habitat assessment finds that a potential hibernaculum is present within 0.25 miles of the project area, please send this information to Eileen Wyza for project recommendations. If a potential or known hibernaculum is found, the DOW recommends a 0.25-mile tree cutting and subsurface disturbance buffer around the hibernaculum entrance, however, limited summer or winter tree cutting may be acceptable after consultation with the DOW. If no tree cutting or subsurface impacts to a hibernaculum are proposed, this project is not likely to impact these species.

The project is within the range of the clubshell (*Pleurobema clava*), a state endangered and federally endangered mussel, and the pondhorn (*Unio merus tetralasmus*), 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 pirate perch (*Aphredoderus sayanus*), a state endangered fish, the pugnose minnow (*Opsopoeodus emiliae*), a state endangered fish, and the greater redhorse (*Moxostoma valenciennesi*), a state threatened fish. The DOW recommends no in-water work in perennial streams from March 15 through June 30 to reduce impacts to indigenous 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 northern harrier (*Circus hudsonis*), a state endangered bird. This is a common migrant and winter species. Nesters are much rarer, although they occasionally breed in large marshes and grasslands. Harriers often nest in loose colonies. The female builds a nest out of sticks on the ground, often on top of a mound. Harriers hunt over grasslands. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 15 through July 31. If this habitat will not be impacted, this project is not likely to impact this species.

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

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

The [local floodplain administrator](#) should be contacted concerning the possible need for any floodplain permits or approvals for this project.

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

Mike Pettegrew
Environmental Services Administrator

Attachment D – Regulated Waters Assessment (RWA)



Northern Kentucky Office
11 Spiral Drive
Suite #8
Florence, Kentucky 41042

T 859.795.2550
F 859.647.6685

November 18, 2022

GAI Project No. R220564.00

Mr. Josh Ferry
The AES Corporation
One Monument Circle
Indianapolis, Indiana 46204

**Regulated Waters Assessment
AES Ohio Amsterdam Substation Expansion Project
AES Ohio WBS: TUSDY.01.05.0047
Shelby County, Ohio**

Dear Mr. Ferry:

This report presents the findings of the Regulated Waters Assessment and identifies the resulting anticipated regulatory permitting compliance requirements for the Amsterdam Substation Expansion Project ("the Proposed Project"), located in German Township, Auglaize County, Ohio (**Appendix B, Figure 1, Project Location**). This field survey effort was done in support of due diligence as required for a Letter of Notification (LON), submitted to The Ohio Power Sitting Board (OPSB). Results from the regulated waters field survey are summarized below.

Project Summary

The Project involves the expansion of the existing Amsterdam Substation by approximately 2.0-acres to the north and west (**Appendix B, Figure 2, Resource Location**). Photos of the Project Area can be found in **Appendix C**.

Work Summary

A remote environmental screening review followed by an on-site field survey was completed by GAI Consultants Inc. (GAI) on July 21, 2022 in order to evaluate potential regulated waters impacts associated with the Project. These investigations were limited to an approximate 480-foot by 615-foot study area around the proposed substation expansion.

The study area was investigated for the presence of wetlands and streams on July 21, 2022. Wetland delineations were conducted in accordance with the 1987 United States Army Corps of Engineers (USACE) Corps of Engineers Wetlands Delineation Manual (Environmental Laboratory, 1987) and the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Midwest Region (Version 2.0) (USACE, 2012). Wetlands were classified using the Classification of Wetlands and Deepwater Habitats of the United States (Cowardin et al, 1979). Classification of the indicator status of vegetation is based on The National Wetland Plant List: 2014 Update of Wetland Ratings (Lichvar, et al, 2014).

Each wetland and waterbody feature were given a unique map designation and were recorded using a Trimble R1 receiver global positioning system mapping grade unit with the capability of sub-meter accuracy. Judgmental upland and wetland soil test pits were taken within the study area at the discretion of the delineator to confirm the presence or absence of wetlands in areas exhibiting wetland indicators. Wetland boundaries, stream banks and/or centerlines were mapped in relation to existing Project data supplied by Duke Energy and various environmental and cadastral background data in Geographical Information Systems (GIS).

Environmental Survey Results

National Wetland Inventory (NWI)

The United States Fish and Wildlife Service's (USFWS) National Wetland Inventory (NWI) maps were reviewed for potential wetland locations within the Project area. The NWI maps were prepared from high altitude photography and, in most cases, were not field verified. As a result, wetlands are sometimes erroneously identified, missed, or misidentified within this data set. The presence of an NWI wetland does not necessarily constitute the presence of a wetland meeting USACE criteria. The NWI map of the area identified no NWI features within the study area (see **Appendix B, Figure 2, Resource Location**).

100-Year Floodplain and Floodway

A review of the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRM) revealed that the Project alignment area does not cross any 100-year floodplain/floodways (see **Appendix B, Figure 2, Resource Location**).

Wetlands

No likely jurisdictional wetlands were identified within the Project study area.

Waterbodies

To evaluate potential streams within the study area, GAI reviewed existing United States Geological Survey (USGS) topographic maps, aerial photography, National Hydrography Dataset (NHD) stream data, and site contour data.

No likely jurisdictional streams were identified within the Project study area.

It is GAI's opinion that construction activities as a result of this Project will not affect any regulated waters and no additional permitting will be required.

Sincerely,

GAI Consultants, Inc.

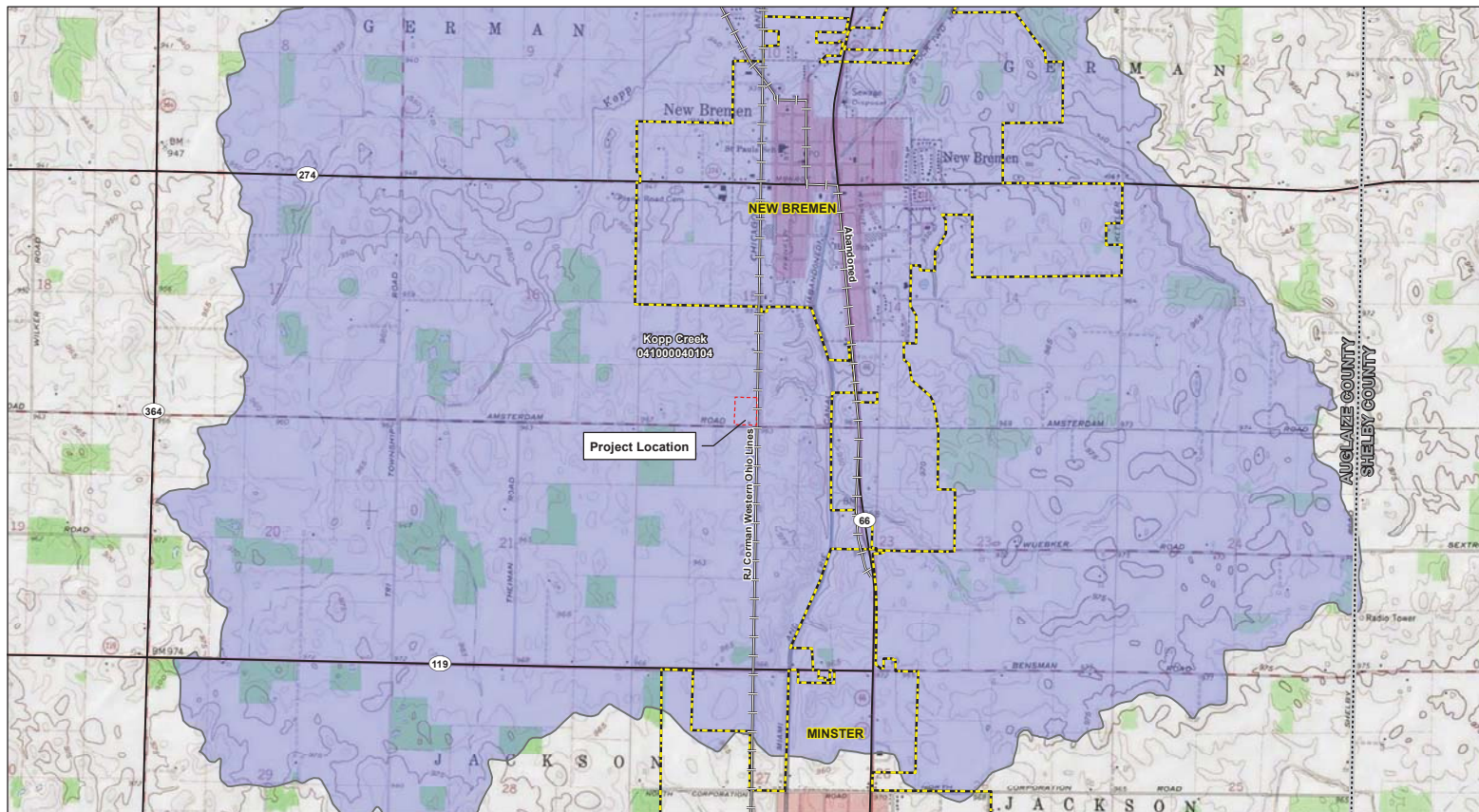


Tyler E. Rankin, MS, CNRP
Assistant Environmental Manager

Attachments: Appendix A – Figures
Appendix B – Photographs

APPENDIX A

Figures



PROJECT LOCATION



AUGLAIZE
COUNTY, OH

REFERENCE:
TOPOGRAPHIC MAP
Early USA Top Map, Accessed: 11/29/2022.
RAILROAD
Ohio Department of Transportation's Railroad, 2/28/2020.
INCORPORATED AREA
Ohio Department of Transportation's Cities, 9/11/2018.
COUNTY BOUNDARY
Ohio Department of Transportation's Counties, 9/11/2018.
WATER
Early U.S. Major Roads, 5/10/2018.
12-DIGIT INTERPOLATED
United States Geological Survey's 12-Digit Hydrologic Units, 6/16/2020.
PROJECT DETAILS
AES Ohio.

State Highway Study Area Kopp Creek
Railroad
Incorporated Area
County Boundary

aes Ohio



gis consultants

0 1,000 2,000 Feet
1 in = 2,000 feet



FIGURE 1
PROJECT LOCATION
Regulated Waters Assessment Report
Amsterdam Substation Expansion Project

DRAWN BY: MBH DATE: 11/29/2022
CHECKED: TDB APPROVED: MRW

APPENDIX B

Photographs

Photographs



**Photograph 1. Study Area.
Looking South. (July 21, 2022)**



**Photograph 2. Study Area.
Looking East. (July 21, 2022)**



**Photograph 3. Study Area. Looking North.
(July 21, 2022)**



**Photograph 4. Study Area. Looking West.
(July 21, 2022)**

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

12/1/2022 2:42:56 PM

in

Case No(s). 22-0834-EL-BLN

Summary: Notification Letter for Amsterdam Substation Expansion Project
electronically filed by Ms. Sarah Howdeshelt on behalf of Dayton Power & Light
Company d/b/a AES Ohio