

**AEP OHIO TRANSMISSION COMPANY'S RESPONSE TO
OHIO POWER SITING BOARD STAFF'S
DISCOVERY REQUEST
OPSB CASE 22-0856-EL-BTX
FIRST SET**

1. Is radio or television interference expected to occur from the operation of the transmission line along either the Preferred or Alternate routes?

RESPONSE: Radio interference is not expected to occur from the operation of the proposed Project. Radio interference can be experienced in the AM broadcast band (535-1605 kHz) and FM band (88-108 megahertz [MHz]), caused by transmission line gap-type discharge (1-1000 MHz). Dielectric discharge due to air ionization, known as corona, is not a concern with this Project. Gap-type discharge, such as that emitted by loose or defective transmission hardware, typically is localized and can be readily detected and corrected, or additional mitigation measures can be applied to eliminate the interference source. Although no gap-type discharge is presently anticipated for this Project, if detected, the affected hardware will be repaired or replaced, and the interference source will be eliminated. Further, although radio frequency noise level of the transmission line during heavy rain is greater than the fair-weather noise level, the quality of radio reception under typical heavy rain conditions is affected more by atmospheric conditions than by operation of transmission lines. Therefore, the construction of the Project is not expected to increase radio frequency noise levels.

Television interference also is not expected to occur as a result of this Project. Today's digital television signals react differently to interference than the pre-2009 analog signals. Common problems with analog television included ghosting of images, noise from weak signals, and other problems, which degraded the quality of the image and sound, although the programming was still watchable. With digital TV, reception of the signal must be very nearly complete. Otherwise, audio and video are not usable. Television signals, which are transmitted at frequencies above 50 MHz, can be affected by gap discharges if received from air broadcasts. These problems have largely been addressed with the use of cable television, and the Company does not expect that any television interference will occur as a result of this project.

2. If radio or television interference is expected to occur, then please identify the most severely impacted areas and discuss methods of mitigation.

RESPONSE: The Company does not expect any radio, television, or other communication system interference to occur from operation of the proposed Project, except as discussed above regarding possible gap-type discharge; it is not necessary to discuss mitigation methods beyond the repair and replacement of loose or defective transmission hardware described above.

4906-5-08 (B)(3)

3. The Application states that approximately 0.86-acres of wetland area will be impacted during construction for the preferred route and 1.18-acres of wetland area will be impacted for the

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Alternative route. Please describe the location of these impacts and if they are temporary or permanent.

RESPONSE: Due to the expansion of the existing ROW to meet the Company's current ROW standard, impacts to wetlands will result from tree clearing activities needed to maintain the 100-foot ROW for proper operation of the transmission line. For the Preferred Route 0.86 acres of permanent impact are anticipated from clearing and for the Alternate Route 1.18-acres of permanent impact are anticipated from clearing. The permanent wetland conversion impacts are at locations that are currently palustrine scrub / shrub (PSS) or palustrine forested (PFO wetlands) within the proposed ROW. Temporary wetland impacts are still being evaluated and will be determined closer to the start of construction.

4. The Application states that four existing pole structures located within wetlands would be replaced during construction. Please describe the locations of these four structures and the amount and types of impacts.

RESPONSE: Along the Project, four existing structures are located within three wetlands (Wetland NE-01S, Wetland NE-01E, Wetland NE-04E, and Wetland NE-08). The existing structure locations within Wetland NE-01S and Wetland NE-01E will be replaced with new structures near the same locations. Permanent wetland impacts will be limited to the structure foundations (less than 0.001-acre of impact per foundation). Based on current preliminary design, no new structures will be placed within Wetland NE-04E or Wetland NE-08. The removal of the existing structures will require cutting the structure to ground surface or below grade and the foundation will remain in place. No new permanent wetland impact will occur from the removal of the existing structures.

4906-5-08 (E)(1)

5. The Application states that multiple local permits are anticipated to be required. Please describe these permits and the actions the Applicant plans to take to obtain these permits.

RESPONSE: Prior to the commencement of construction activities in areas that require permits or authorizations by federal or state laws and regulations, the Company will obtain and comply with such permits or authorizations:

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| Agency | Permit Requirement | Status |
|--|--|---------------|
| Ohio Environmental Protection Agency (OEPA) | General NPDES Construction Storm Water Permit OHC000005 | To be filed |
| Putnam and Hancock County Soil and Water Conservation District | Storm Water Pollution Prevention Plan (SWP3) – Review Application | To be filed |
| Putnam County | Floodplain Development Review | To be filed |
| Ohio Department of Transportation; Putnam and Hancock County; Village of Leipsic and Village of McComb; and Townships of Van Buren, Liberty, Portage, and Pleasant | Driveway Entrance Permits (E-Permitting Application, Driveway Permit for Construction within the County/Township Right-of-Way Limits) | To be filed |
| Ohio Department of Transportation; Putnam and Hancock County; Village of Leipsic and Village of McComb; and Townships of Van Buren, Liberty, Portage, and Pleasant | Roadway Occupancy Permits and review (E-Permitting Application, Use of County/Township Right of Way Permit, Utility Installation Application Permit) | To be filed |
| Putnam and Hancock County; Village of Leipsic and Village of McComb; and Townships of Van Buren, Liberty, Portage, and Pleasant | Special Hauling Permit and Road Use Maintenance Agreement (RUMA) | To be filed |
| Norfolk Southern Railroad | Railroad Crossings Permits | To be filed |

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Geology

6. Page 8-28 of the application indicates site specific geotechnical testing is necessary to ascertain soil conditions for foundation construction. Staff agrees. However, the application indicates that no on site geotechnical investigations have been conducted to date, but rather the Applicant indicates this information would be acquired and a report developed during the final engineering design phase. Given final engineering design is typically part of the post-certificate process, Staff requests an interim level geotechnical investigation to supplement the application with the understanding a full geotechnical investigation would be performed post-certificate should the Board grant a certificate. Please provide Staff with a work plan that outlines procedures and a schedule for an interim geotechnical investigation

RESPONSE: Site specific soil borings along the preferred and alternate routes were completed in 2022 to support preliminary engineering for the proposed route alignments and further soil borings are not anticipated at this time.

7. The application mentions that review of the USGS-NRCS data indicates that 97.5% of the project area is considered 'very limited' for placements of shallow foundations. This is mostly attributed to the depth assigned to the saturated zone in the project area. Understanding no geotechnical borings have been conducted to date, does the Applicant anticipate the need for dewatering during the proposed construction?

RESPONSE: The Company does not anticipate dewatering will be required during the proposed construction activities.

8. Staff's review of ODNR's Oil and Gas Well Viewer website indicates there are a significant number of historic oil and gas wells in the far eastern portion of the project. Please describe how the Applicant will ensure subsurface oil and gas features are avoided during the proposed construction

RESPONSE: The Company will have proposed structure locations surveyed and request OUPS 811 for identifying underground utilities prior to construction activities.

**This foregoing document was electronically filed with the Public Utilities
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in

Case No(s). 22-0856-EL-BTX

Summary: Response Response to Staff's 1st Set of Discovery Request.
electronically filed by Hector Garcia-Santana on behalf of AEP Ohio Transmission
Company, Inc.