
**Application for Certificate of Environmental Compatibility and Public Need
Dowling-Fulton 345 kV Transmission Line Tap to Melbourne Substation Project
Supplemental Information
Case No. 22-0248-EL-BTX**

Michael Williams
Executive Director
Public Utilities Commission of Ohio, Power Siting Department
180 East Broad Street
Columbus, OH 43215-3793

February 6, 2024

Dear Director Williams,

This letter provides supplemental information to the Ohio Power Siting Board regarding American Transmission Systems, Incorporated (“ATSI”)’s Dowling-Fulton 345 kV Transmission Line Tap to Melbourne Substation Application for Certificate of Environmental Compatibility and Public Need (“Application”). Specifically, in this Supplement, ATSI details a proposed Preferred Route Modification in the vicinity of the Delta Raceway property located at 8571 County Rd 7-2, Delta, Ohio 43515 (“Delta Raceway”) and does not change any other information as submitted in the original Application.

As proposed in OPSB Case 22-0248-EL-BTX, and as shown in Figure 8-2G of ATSI’s Application, the Preferred Route (which was already recommend for approval by Staff, subject to conditions, in the November 21, 2023 Staff Report) extends from the east, crosses County Road 7-2, and enters the southeast corner of the Delta Raceway property. At this point, the Preferred Route extends south then trends west, adjacent to the southern property line of the Delta Raceway. As you and the Administrative Law Judge may recall, none of the property owners who testified at the public hearing in this matter on December 6, 2023, objected to the Preferred Route identified in the Application.

Since ATSI filed the Application, however, Delta Raceway has constructed a large outbuilding structure in the proposed transmission line corridor. And on December 8, 2023, Rocky A. Conley moved to intervene in this matter on behalf of Delta Raceway. In his Motion to Intervene, which ATSI did not oppose, Mr. Conley objected to the Preferred Route’s crossing of Delta Raceway. Although ATSI subsequently made repeated efforts to communicate and work with Delta Raceway to survey and propose route alignment adjustments on the Delta Raceway property, Delta Raceway was unresponsive, and closed the Raceway property to ATSI’s surveyors.

As ATSI informed the Administrative Law Judge and Staff at the January 9, 2024 hearing in Columbus, which Mr. Conley did not attend, ATSI has investigated a route modification that would address his concerns, avoid impacting the Raceway property, meet the proposed project objectives, and should not unnecessarily lengthen the procedural schedule for OPSB Case No. 22-0248-EL-BTX.

As shown on Figure 8-2G Rev. 1, attached to this letter as Exhibit A, the proposed Preferred Route Modification would consist of a simultaneous, two-step construction. If certificated by the Board, the first step would include the construction of an approximately 0.8 mile construction of 345 kV transmission line paralleling and to the north of the existing Fulton-North Star Steel 345 kV Transmission Line. This parallel construction will physically connect on the eastern and western ends to the existing Fulton-North Star Steel 345 kV Transmission Line. The proposed Preferred Route Modification would be constructed by installing a structure east of the intersection of the Preferred Route and County Road 7-2. At this point, the proposed Preferred Route Modification would turn north, crossing the turnpike to a structure that ties in with the existing Fulton-North Star Steel 345 kV Transmission Line. From this point, the proposed Preferred Route Modification would connect to the existing electrically vacated structures of the Fulton-North Star Steel 345 kV Transmission Line circuit that now occupy the newly constructed parallel transmission line. At the western extent of the vacated section of transmission structures, the proposed Preferred Route Modification would trend south, cross the turnpike, and rejoin the Preferred Route alignment on the Village of Delta Reservoir property.

In the Route Selection Study ("RSS") included in OPSB Case No. 22-0248-EL-BTX, a variation of the proposed Preferred Route Modification was considered as part of the RSS segment analysis. Specifically, on page 3-13 of the RSS, Segment 38 encompasses the alignment of the proposed Preferred Route Modification. Segment 38 was not considered for further evaluation as originally presented, because route segments north of I-80/I-90 were eliminated due to those segments crossing the existing Fulton-North Star 345 kV Transmission Line, which would require an extensive outage of this line and construction of at least two large-angle structures. However, the proposed Preferred Route Modification described herein eliminates the crossing of the existing Fulton-North Star 345 kV Transmission Line due to the parallel construction for its short distance, and also eliminates the need for the two large-angle structures.

In the course of its investigation of this Preferred Route Modification, ATSI has reached out to the property owners along the north side of the turnpike where the proposed Preferred Route Modification will be located to begin discussions for easements that would be required in addition to the existing easements already associated with the Fulton-North Star Steel 345 kV Transmission Line. That outreach occurred January 5, 6, 2024, and the property owners have indicated a willingness to work with ATSI on the necessary easements. On January 12, 2024, a letter was sent to parcel APN: 20-040960-01.000, attached as Exhibit B, to inform the property owner who had not previously been notified of the project, of the need to conduct a survey in connection with the proposed route change. Due to the proposed route change, the property in question is now adjacent to the project corridor. To date, ATSI has received no objection from any of the property owners that it has communicated with regarding the proposed Preferred Route Modification. When new dates for testimony and public hearing are identified, the below property owners will be notified in a separate mailing. The parcels identified include:

APN: 20-041048-00.000,
APN: 20-040988-00.000,

APN: 20-040960-00.000,
APN: 20-040960-01.000,
APN: 20-040956-01.000, and
APN: 20-040956-00.000

ATSI, also in its course of investigation via desktop review and verified via field review, has determined that the proposed Preferred Route Modification will result in an overall net reduction of environmental impacts. Because of the realignment to the north side of the turnpike, the need to traverse and clear portions of the identified forested wetland DFN-01 (2.01 acres) and DFN-02 (0.05 acres) will be completely avoided. Also, the proposed Preferred Route Modification alleviates any potential issues with the Village of Delta Reservoir. In addition, in the course of its investigation verified via field review, no cultural sites or impacts were identified.

ATSI respectfully requests that the Board consider this Supplement and Proposed Route Modification as part of the Application for its Dowling-Fulton 345 kV Transmission Line Tap to Melbourne Substation. As indicated above, all other information remains as submitted in the original Application. The Board's rules permit the Board to determine "that the location of all or part of the proposed facility should be modified," and if it so finds, "it may condition its certificate upon such modifications." Ohio Adm.Code 4906-2-30.

ATSI welcomes additional data requests from Staff that may be prompted by the proposed Preferred Route Modification. As discussed at the January 9, 2024 hearing, upon the docketing of this correspondence, ATSI plans to confer with Staff to promptly and jointly propose a schedule for the submission of a proposed stipulation, testimony, and hearing.

Cc: Jon Pawley, Deputy Director, Power Siting Department
James O'Dell, Senior Siting Analyst, Facility Review and Compliance
Thomas Lindgren, Public Utilities Section, Office of Ohio Attorney General
Kimberly M. Naeder, Public Utilities Section, Office of Ohio Attorney General
Rocky A. Conley, Intervenor on behalf of Delta Raceway
Tracey Janis, ATSI, Mgr., Siting Survey & Row
Anne Rericha, Attorney V, FirstEnergy Service Company

Sincerely,



Nataliya Bryksenkova, Engineer
Transmission Siting
FirstEnergy Service Company

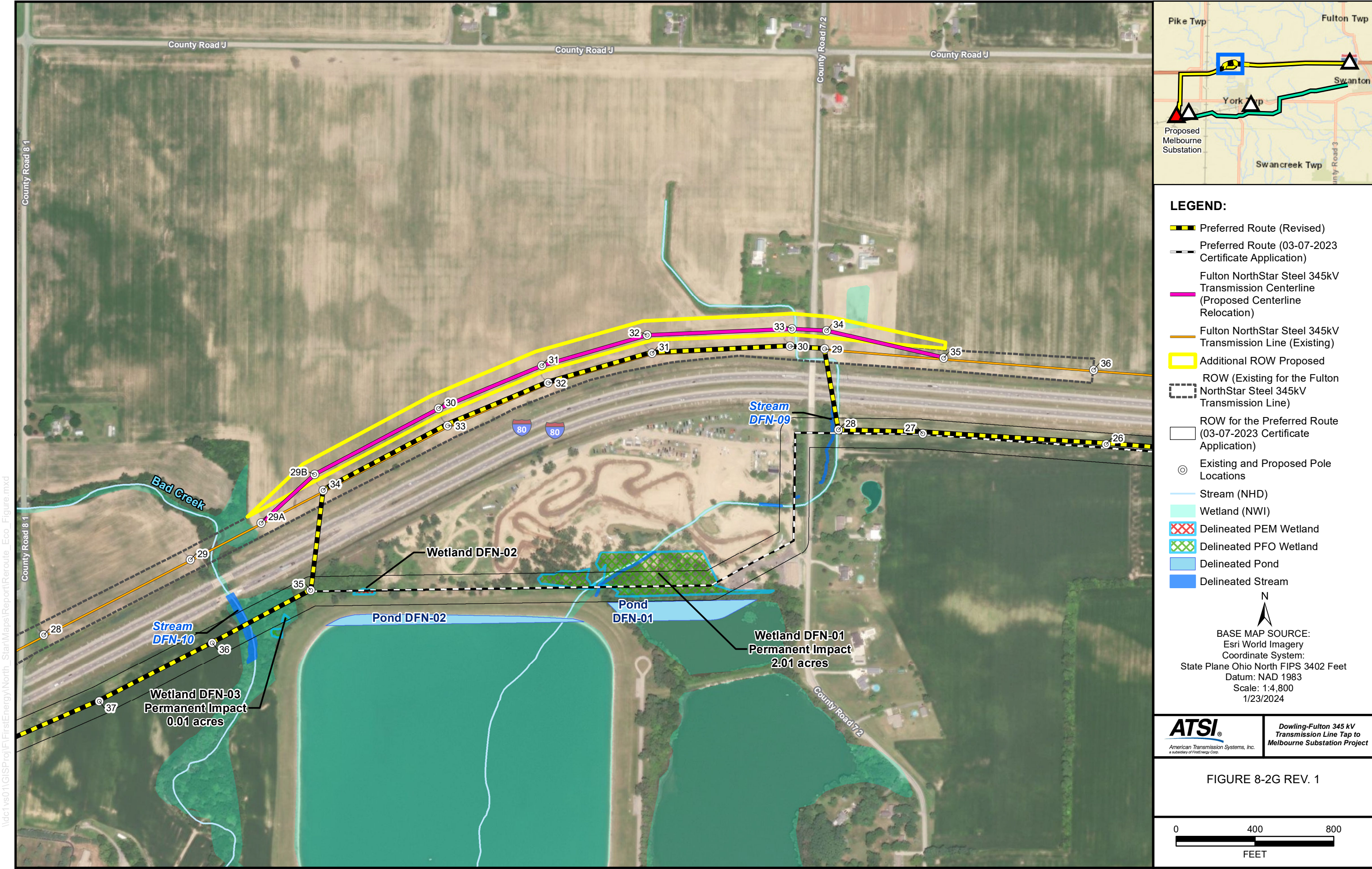


EXHIBIT A

January 12, 2024

Goetz Michael Allen
8823 County Road 7-2
Delta, OH 43515

RE: Permanent Parcel ID: 20-040960-01.000

NOTICE OF ENTRY FOR SURVEY WORK
Dowling-Fulton 345 Kilovolt (kV) Transmission Line Tap to Melbourne Substation Project

Dear Property Owner,

American Transmission Systems, Incorporated, (ATSI), a FirstEnergy company, is planning to install a new transmission line in your area to enhance electric service reliability.

ATSI will begin field surveys in the upcoming weeks, crew and weather permitting. Our crews will drive or walk along routes currently under consideration and will take measurements and occasionally obtain small soil and/or vegetation samples. Please note that no heavy equipment will be used as part of this effort. Small identification flagging (marker ribbon) may be placed in areas along portions of the survey area.

We appreciate your cooperation with our agents and contractors in the field as they proceed with this work. No action is required from you at this time. If you have any comments, questions or concerns regarding the transmission line work, please contact our project team at (888) 311-4737 or Tricia Sands from AFS a, contractor for ATSI at (740) 891-8084.

Sincerely,



Jeffrey S. Moshier
Sr. Real Estate Representative
FirstEnergy Real Estate Department
FirstEnergy Service Company on behalf of
American Transmission Systems, Incorporated

**This foregoing document was electronically filed with the Public Utilities
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Case No(s). 22-0248-EL-BTX

Summary: Correspondence Correspondence Providing Supplemental Information Regarding Applicant's Proposed Modification to the Preferred Route electronically filed by Mr. Lawrence B. Hughes on behalf of American Transmission Systems, Inc..