

**BEFORE THE  
OHIO POWER SITING BOARD**

In the Matter of the Application of American )  
Transmission Systems, Incorporated for a ) Case Number:  
Certificate of Environmental Compatibility and ) 22-0248-EL-BTX  
Public Need for the Dowling-Fulton 345 kV )  
Transmission Line Tap to Melbourne )  
Substation Project )

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**SUPPLEMENTAL PREPARED DIRECT TESTIMONY OF  
NATALIYA BRYKSENKOVA  
ON BEHALF OF  
AMERICAN TRANSMISSION SYSTEMS, INCORPORATED**

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Incorporated*

Filed: March 19, 2024

1 **SUPPLEMENTAL PREPARED DIRECT TESTIMONY OF MS. NATALIYA BRYKSENKOVA**  
2

3 **Q. PLEASE STATE YOUR NAME, EMPLOYER, BUSINESS ADDRESS, AND POSITION.**

4 A. My name is Nataliya Bryksenkova. I am employed by the FirstEnergy Service Company. My  
5 business address is 76 South Main Street, Akron, Ohio 44308. Since October 2014, I have held  
6 the position of an Engineer IV in Transmission Engineering, which is part of Transmission  
7 and Substation Design.

8  
9 **Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL TESTIMONY IN THIS CASE?**

10 A. My Supplemental Testimony explains and supports the Joint Stipulation and  
11 Recommendation ("Joint Stipulation") filed on March 19, 2024. The Joint Stipulation results  
12 from American Transmission System ("ATSI")'s discussions with Staff of the Ohio Power  
13 Siting Board ("Staff") and embodies the Parties' mutual agreement on all concerns related to  
14 the Project. I believe that the Joint Stipulation represents a fair and reasonable compromise  
15 of the issues in this proceeding and that it should be adopted and approved by the Board.

16 **Q. DOES THE STIPULATION BETWEEN ATSI AND STAFF REPRESENT A PRODUCT OF**  
17 **SERIOUS BARGAINING AMONG CAPABLE KNOWLEDGEABLE PARTIES?**  
18

19 A. Yes, it does. Both ATSI and Staff are knowledgeable in matters before the Board and were  
20 represented by experienced, competent counsel. Therefore, the Joint Stipulation can be fairly  
21 stated to represent the product of serious bargaining between capable, knowledgeable parties.  
22 Further, the Joint Stipulation captures the Parties' agreement about conditions contained in  
23 the Staff Reports filed on November 21, 2023, and March 11, 2024, with very few minor  
24 revisions.

1 **Q. DOES THE JOINT STIPULATION BENEFIT CONSUMERS AND THE PUBLIC**  
2 **INTEREST?**

3  
4 A. Yes, it does. The Joint Stipulation not only provides for construction of the Project, thus  
5 meeting the need for improved electric service in the Village of Delta and surrounding areas,  
6 but also transparency to the public relative to ATSI's geotechnical findings and acquisition of  
7 permits and/or agreements prior to undertaking certain work. Further, the Joint Stipulation  
8 includes added environmental protection measures during Project construction. Moreover,  
9 the Project addressed in the Joint Stipulation will mitigate a violation of PJM Interconnection,  
10 LLC ("PJM")'s and FirstEnergy's Planning Criteria – loss of load greater than 300 MW – by  
11 adding redundancy through a second 345 kV source, via the proposed Melbourne Substation,  
12 to the existing North Star BlueScope Steel Sydney Substation. Further, the Project will enable  
13 ATSI to meet projected electric service load needs as well as provide operational flexibility to  
14 customers. Finally, the Joint Stipulation's adoption of ATSI's proposed modification to the  
15 Preferred Route addresses the concerns raised by the sole intervening party in this case, Rocky  
16 A. Conley, by eliminating impacts to his Delta Raceway property.

17 **Q. DOES THE JOINT STIPULATION VIOLATE ANY IMPORTANT REGULATORY**  
18 **PRINCIPLE OR PRACTICE?**

19  
20 A. No. The Joint Stipulation was negotiated and drafted by ATSI and Staff to comply with the  
21 requirements of Ohio Administrative Code Rule 4906-2-24(A), which provides the basis for  
22 parties to submit a stipulation for the Board to consider in a power siting proceeding. ATSI's  
23 intent in entering the Joint Stipulation was to ensure that Staff's concerns were fairly and  
24 comprehensively addressed and that the Project would be constructed to serve the public

interest. I am not aware, therefore, of any regulatory principal or practice that the Joint Stipulation violates.

**Q. ARE YOU ASKING THE BOARD TO APPROVE THE STIPULATION?**

A. Yes, I believe the Joint Stipulation provides a fair result for customers and meets all of the Board's criteria for adoption of settlements. ATSI requests that the Board issue an order approving the settlement and adopting the Joint Stipulation.

**CERTIFICATE OF SERVICE**

The Ohio Power Siting Board's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned hereby certifies that a copy of the foregoing document is also being served via electronic mail on the 19<sup>th</sup> day of March, 2024, upon the following:

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/s/ L. Bradfield Hughes  
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**Case No(s). 22-0248-EL-BTX**

Summary: Testimony Supplemental Direct Testimony of Nataliya Bryksenkova in Support of the Joint Stipulation and Recommendation by Ohio Power Siting Board Staff and Applicant electronically filed by Mr. Lawrence B. Hughes on behalf of American Transmission Systems, Inc..