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September 16, 2022

VIA E-FILING

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

Re: *American Transmission Systems, Incorporated's Letter of Notification
Application for a Construction Certificate
Leroy Center-Mayfield Q1 and Q2 Transmission Lines Partial
Reconductor Project
OPSB Case No. 22-0747-EL-BLN*

Dear Ms. Troupe:

Please find attached American Transmission Systems, Incorporated's ("ATSI's") response to Staff's first set of data requests dated September 9, 2022.

Should the Ohio Power Siting Board desire further information or discussion of this submittal, please contact me at 614-227-1989.

Very truly yours,



Devan K. Flahive

Attachments

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Letter of Notification)
Application by American Transmission) Case No. 22-0747-EL-BLN
Systems, Incorporated for a Construction)
Certificate for the Leroy Center-Mayfield)
Q1 and Q2 138 kV Transmission Lines
Partial Reconductor Project

ATSI'S RESPONSE TO FIRST DATA REQUEST SET FROM OPSB STAFF

Requests Dated September 9, 2022:

Costs

1) Page 8 of the application indicates the estimated cost of the project is \$10,353,500 where other portions of the application reference \$14,100,000 and \$14,900,000. Please clarify the estimated cost of the proposed project.

RESPONSE: The estimated cost of \$10,353,500 provided on Page 8 of the application is the most current estimate for this proposed project. The costs referenced on the PJM slides provided as Exhibit 5 in the application were based on earlier estimates utilizing traditional construction methods and significant access road construction. Since the time of those estimates, ATSI has decided to utilize helicopters for construction which results in an estimated decrease in costs due to limiting the amount and/or extent of access road construction needed for this project.

2) Please elaborate on the cost estimate for the project, including the Class of the estimate, the FERC formula rate, the OATT Attachment designation, recovery through any base transmission rider, and what portion would be allocated to the customers of the ATSI zone.

RESPONSE: The estimate is a Class 3 estimate and the project costs are the responsibility of ATSI, as the asset-owner. The ATSI customers will be allocated the costs via FERC formula rates for the ATSI Transmission Zone, Attachment H-21 in the PJM OATT.

Ecological

3) Please describe the location and total acreage of permanent and temporary wetland impacts including construction matting.

RESPONSE: No permanent wetland impacts are anticipated for this Project because ATSI is proposing to re-conductor the 138kV transmission line via helicopter as well as because no new structures will be installed.

ATSI’s plans for access roads, work pads, and landing zones to avoid placement within wetlands to the extent practicable, though temporary impacts will affect six wetlands. For those areas, disturbances will be minimized by the installation of timber matting within all wetland crossings/work areas for the duration of use during construction on the Project. Further details regarding the temporary impacts are provided in the Wetland Impact Table below.

Wetland Impact Table

Leroy Center-Pawnee Tap 138 kV Transmission Line Reconductoring Project

Wetland ID	Location		Wetland Type ¹	Total Area (ac) ²	Temporary Impact (ac) ²	Permanent Impact (ac) ²
	Latitude	Longitude				
Wetland LP-001	41.68646	-81.14181	PEM	8.68	0.426	0.000
Wetland LP-005	41.65605	-81.14277	PEM	1.00	0.052	0.000
Wetland LP-006	41.65372	-81.14271	PEM	1.13	0.051	0.000
Wetland LP-017	41.63275	-81.1711	PEM	3.43	0.050	0.000
Wetland LP-018	41.63255	-81.1714	PEM	0.18	0.041	0.000
Wetland LP-031	41.61467	-81.20055	PEM	0.06	0.024	0.000
Wetland LP-056	41.59571	-81.22851	PEM	0.30	0.027	0.000
WETLAND IMPACT SUBTOTALS					0.67	0.00

¹Cowardin et al. 1979.

²This acreage only corresponds to the area delineated within the environmental survey corridor.

4). The ODNR Division of Wildlife recommends that a desktop habitat assessment be conducted, followed by a field assessment if needed, to determine if a potential hibernaculum is present within the project area. Has the Applicant completed this assessment?

RESPONSE: Yes, Jacobs, ATSI’s environmental consultant for this Project, already conducted a desktop habitat assessment to determine if there are potential hibernaculum(a) present within 0.25-miles of the Project area. Jacobs followed the current USFWS “Range-wide Indiana Bat Survey Guidelines” when conducting this assessment and utilized data obtained from the ODNR Mines of Ohio Viewer, ODNR geologic maps, topographic maps, and aerial photographs. According to the ODNR Division of Mineral Resources data, several active surface mines and Historic Industrial Minerals Locations (former quarries) are located in the general Project area; however, the closest mining feature to the Project was a historic quarry located approximately 0.7 miles from the Project. No active surface mines are located within 0.25 miles of the Project. During the desktop analysis, no potential karst features were identified within 0.25-mile of the Project

area. During the field survey of the Project, no evidence of potential hibernaculum consisting of caves, rock outcrops, mines, cliffs, or karst features were observed. In addition to the field survey, coordination with ODNR did not identify any known bat hibernaculum within a one-mile radius of the Project. Based on the desktop habitat review and the results of the field survey, it does not appear likely that potential hibernaculum exist within 0.25-mile of the Project area.

5). The application states that Jacobs is presently mapping the various habitats within the project's disturbance area to identify any areas of concern relating to the listed species. Has this map been completed?

RESPONSE: At the time of the field surveys, Jacobs' biologists documented land use and general habitats along the Project area. Based on this general assessment, Jacobs has identified locations of grassland and wetland habitat areas that may be potential habitat for nesting bird species that were identified by ODNR. The general habitat observations from this survey are identified within the Habitat Land Use Maps provided in Attachment 1. This habitat assessment will be provided to ODNR in a follow-up correspondence for the Project.

ATSI will adhere to seasonal nesting restrictions for the installation of access roads and work pads within any identified grassland habitat areas. If construction were to be necessary within the nesting period, ATSI will install timber matting in such areas prior to April 15th, 2023, in order to inhibit any potential bird species from nesting within the work areas of the Project.

Based on ODNR's recommendation, Jacobs also surveyed the construction limits of disturbance (LOD) for the winged cudweed in August 2022, which is during the flowering period of this species. The presence/absence survey of the LOD included the proposed access roads, work-pads, pull-pads, and helicopter land zone areas. The plant communities observed within the study area primarily consisted of semi-maintained old field, regularly mowed residential, and palustrine emergent wetland habitats. Although potentially suitable habitat was identified for winged cudweed along the ROW edges surrounded by forested areas, these plants were not observed within in the study area.

Grid/Need

6) Page 7/15 of the 'Reliability Analysis Update' from TEAC of August 10, 2021, and page 53/128 of the 'PJM Identified Issues and Planned Solutions Near the MISO Seam' of February 17, 2021, both refer to b3152 and offer "Reason for Cancellation". What is meant by Reason for Cancellation?

RESPONSE: Both presentations indicate PJM has determined baseline project b3152 has enough of an impact on the power flowing on the transmission system such that the voltage violation to

be mitigated by baseline project b2675 (the subject of this slide) no longer exists. Therefore, baseline project b3152 is cited as the reason that baseline project b2675 is to be cancelled.

7) What is the relationship between PJM b3323 and PJM b3152? Has b3323 replaced b3152?

RESPONSE: Project b3323 refers to the Leroy Center to Pinegrove Q3 138 kV line section, whereas the project b3152 refers to the Leroy Center to Pawnee Q1 138 kV line section: two different transmission lines. Therefore, b3323 does not replace b3152.

They bear no direct relationship to one another other than being in the same transmission corridor, and they were both cited as being necessary due to the Byron generator deactivation. Because the Byron deactivation was subsequently withdrawn, PJM has the project (b3323) on hold while the power flow models are retooled. However, b3152 resolves a separate baseline RTEP violation (identified prior to and independent of the Byron generator deactivation notice). The baseline RTEP violation was identified in the 2019 RTEP as a Summer Generator Deliverability, N-1, and N-1-1 thermal violation¹. This project is still needed to address the baseline reliability criteria violations identified in the 2019 RTEP.

8) Is Q1 considered a PJM baseline project, and Q2 a supplemental project? When do you expect PJM to assign a supplemental number to Q2?

RESPONSE: The Leroy Center-Mayfield Q1 138 kV line project from Leroy Center to Pawnee is a PJM baseline project. The Leroy Center-Mayfield Q2 138 kV line project is a supplemental project. ATSI expects PJM to assign a supplemental project number in the near future.

General

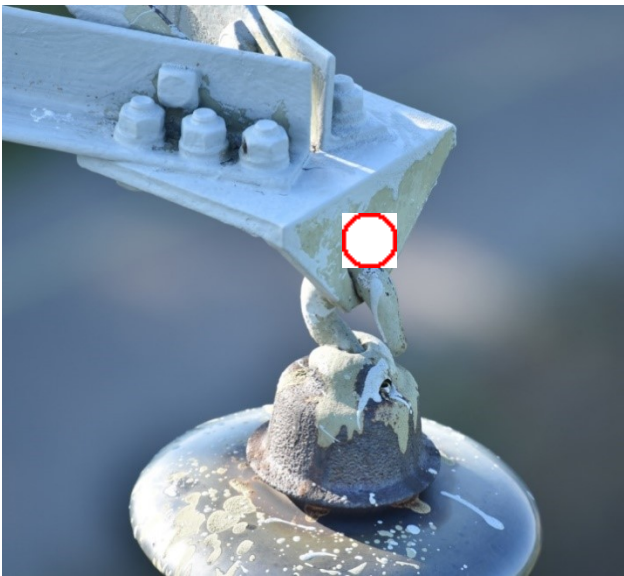
9) For confirmation of page 1 of the application; is 19.3 miles the length of the line from Leroy Center Station to Mayfield Station? Is the 8.4-mile section the distance from Leroy Center Station to Structure 7056?

RESPONSE: Yes. The 19.3 miles represents the total length between Leroy Center and Mayfield while the 8.4 miles represents the distance between Leroy Center to Structure 7056.

¹ <https://www.pjm.com/-/media/committees-groups/committees/teac/20191212/20191212-item-05-reliability-analysis-update.ashx>

10) Please provide additional description, clarification, and/or illustration of the “measurable cold end attachment plate wear” and “mounting holes”, mentioned on pages 3 and 4 of the application.

RESPONSE: The cold end attachment plate mounting hole is the point of the structure that is used for attachment of the insulator mounting hardware (hook, clevis, or other). The wear observed, the elongation of the mounting hole, is of general material wastage or deformation at the point of connection from its original state. Pictures below illustrate the original circular shape of the mounting hole (red circle). Note the location of the insulator mounting hardware below the circle, which indicates deformation and elongation of the hole and plate.



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Case No(s). 22-0747-EL-BLN

Summary: Response Response to First Set of Data Requests from Staff
electronically filed by Ms. Devan K. Flahive on behalf of American Transmission
Systems Incorporated