



Legal Department

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November 21, 2017

Chairman Asim Z. Haque  
Ohio Power Siting Board  
180 East Broad Street  
Columbus, Ohio 43215

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**Re: In the Matter of the Letter of Notification Application of AEP Ohio  
Transmission Company, Inc. for a Certificate of Environmental  
Compatibility and Public Need for the Kammer-Vassell 765kV  
Transmission Line Extension  
Case No. 17-2363-EL-BLN  
Request for Expedited Processing**

Dear Chairman Haque,

Pursuant to O.A.C. 4906-6-05, attached please find a copy of the Letter of Notification application for the above-referenced project by AEP Ohio Transmission Company, Inc. (AEP Ohio Transco). AEP Ohio Transco previously requested expedited processing of this application pursuant to O.A.C. 4906-6-03(A) in the pre-application notification letter filed in this proceeding on November 16, 2017.

If you have any questions, please do not hesitate to contact me.

Respectfully submitted,

/s/ Christen Blend

Christen Blend (0086881), Counsel of Record  
Hector Garcia (0084517)  
Counsel for AEP Ohio Transmission Company, Inc.

cc. John Jones, Counsel OPSB Staff  
Jon Pawley, OPSB Staff

**LETTER OF  
NOTIFICATION  
for Kammer-Vassell  
765 kV Transmission  
Line Extension**



OPSB Case No.

17-2363-EL-BLN

Submitted to:

The Ohio Power Siting Board

Pursuant to O.A.C. 4906-6-05

Submitted by:

AEP Ohio Transmission Company, Inc.

November 21, 2017

# **Letter of Notification**

## **Kammer-Vassell 765 kV Transmission Line Extension**

### **4906-6-05 (B) GENERAL INFORMATION**

AEP Ohio Transmission Company, Inc. (“AEP Ohio Transco”) provides the following information to the Ohio Power Siting Board (“OPSB”) in accordance with the requirements of Ohio Administrative Code Section 4906-6-05.

#### ***4906-6-05(B)(1) Project Name and Reference Number***

The Applicant is AEP Ohio Transco. The name of the project is the Kammer-Vassell 765 kV Transmission Line Extension (“Project”) and the OPSB Case Number is 17-2363-EL-BLN.

#### ***4906-6-05(B)(1) Description of the Project***

AEP Ohio Transco will be creating two approximately 0.30 mile-long line breaks in the existing Kammer-Vassell 765 kV Transmission Line. The line extensions are needed to interconnect the existing line to a new Utility Switchyard proposed by Guernsey Power Station, LLC (“GPS”) in OPSB Case No. 17-1828-EL-BLN, as shown in Figures 1 and 2 to the September 8, 2017 application filed in that docket.<sup>1</sup> The two new line taps that are the subject of this application will provide an in and out flow from the Utility Switchyard to the existing Kammer-Vassell 765 kV Transmission Line. One line tap extends approximately 0.3 mile north-northwest from the Utility Switchyard to the existing transmission line (the Western Line Tap), and the other extends approximately 0.3 mile north-northeast from the Utility Switchyard to the existing transmission line (the Eastern Line Tap).

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<sup>1</sup> The referenced Figures are reproduced herein for convenience. All of the referenced Attachments are available in the docket for Case No. 17-1828-EL-BLN, available at <http://dis.puc.state.oh.us/CaseRecord.aspx?CaseNo=17-1828>.

As reflected in Figure 2, the Western Line Tap will extend north approximately 900 feet from the Utility Switchyard to a dead-end structure (2A), then turn north-northwest for approximately 650 feet to a dead-end structure (3A) that taps into the existing Kammer-Vassell 765 kV Transmission Line. The Eastern Line Tap will extend north approximately 550 feet from the Utility Switchyard to a dead-end structure (2C), then turn north-northeast for approximately 1,050 feet to a dead-end structure (3C) that taps into the existing Kammer-Vassell 765 kV Transmission Line. Upland access is available to structures 2A and 3C, while the presence of wetlands will require matting to provide temporary access during construction of structures 2C and 3A.

All components of this Project are proposed on property under option by GPS and are located entirely within Valley Township, Guernsey County, Ohio. Prior to commencement of construction, it is AEP Ohio Transco's understanding that GPS will exercise its options for easements (for access) and purchase of the properties on which the Project is proposed and will allow AEP Ohio Transco access to that property for purposes of construction, operation, and maintenance of the facilities proposed herein. Upon completion of construction, the Utility Switchyard, Eastern and Western Line Tap ROWs, and Western Distribution ROW will be transferred to AEP; the Interconnection ROW and Eastern Distribution ROW will be subject to negotiations between GPS and AEP to determine the appropriate division of ownership.

***4906-6-05(B)(1) Reason the Project Meets Letter of Notification Requirements***

The Project meets the requirements of O.A.C. Section 4906-6-01 that require the submittal of a Letter of Notification (LON):

- Appendix A(1)(b) states that power transmission lines greater than 0.2 mile in length but not greater than two miles in length require the submittal of an LON; the Eastern Line Tap ROW is 0.3 mile in length; the Western Line Tap ROW is 0.3 mile in length.

#### ***4906-6-05(B)(2) Need for the Project***

The need for this project, for AEP Ohio Transco's purposes, is the electrical interconnection of the newly-proposed GPS generation facility with AEP's existing Kammer-Vassell 765kV Transmission System, and the Project is solely needed to meet the requirements of AEP Ohio Transco's specific customer, GPS.

#### ***4906-6-05(B)(3) Project Location Relative to Existing and Proposed Lines***

The location of the Project in relation to existing AEP transmission lines is shown in Figure 2.

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

No formal siting or routing study was completed for the Project and no significant alternatives were studied. GPS provided AEP Ohio Transco the proposed routes that best met the layout of GPS's project.

The location of the Utility Switchyard adjacent to the existing Kammer-Vassell 765-kV Transmission Line corridor will facilitate AEP Ohio Transco's tap into the existing transmission lines and allow for consolidation of property ultimately to be controlled by AEP Ohio Transco. It is AEP Ohio Transco's understanding that GPS deigned the Utility Switchyard to be positioned as close to the 765-kV lines as possible, while minimizing impacts to wetlands.

All poles have been specifically positioned to minimize the need for structures to be located in wetland or floodplain. The resulting ROWs represent the most suitable and least-impact routing alternatives.

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

Within seven days after filing this LON, AEP Ohio Transco will issue a public notice in a newspaper of general circulation in the Project area. The notice will comply with all requirements of O.A.C. 4906-6-08(A)(1)-(6). Further, AEP Ohio Transco has mailed (or will mail) a letter, via first class mail, to affected landowners, tenants, contiguous owners and any other landowner AEP Ohio Transco may approach for an easement necessary for the construction, operation, or maintenance of the Project. The letter will comply with all requirements of O.A.C. Section 4906-6-08(B). AEP Ohio Transco also maintains a website (<http://aeptransmission.com/ohio/>) which provides the public access to an electronic copy of this LON and the public notice for this LON. A paper copy of the LON will be served to the public library in each political subdivision for this Project. AEP Ohio Transco retains ROW land agents that discuss Project timelines, construction and restoration activities and convey this information to affected owners and tenants.

#### ***4906-6-05(B)(6) Anticipated Construction Schedule and In-Service Date***

Construction of the Project is expected to begin after the first quarter of 2018 and it is scheduled to be in-service by the first quarter of 2020.

#### ***4906-6-05(B)(7) Maps Depicting Project Location***

Figure 1 has been prepared at a scale of 1:24,000 feet to show the proposed location of the Project on a topographic map. AEP Ohio Transco's Project consists the Eastern and Western Line Tap Rights-of Way and structures 2A, 2C, 3A, and 3C.

Figure 2 illustrates the location of the GPS Collector Bus, the Interconnection ROW, the two line taps, the two distribution lines, and the Utility Switchyard, as well as proximate streets, roads, and highways, on a recent aerial photograph. As can be seen, the Project is located entirely

within the Valley Township, Guernsey County, Ohio, approximately 0.15 mile west of Interstate 77 and approximately 0.6 mile north of Clay Pike Road.

#### ***4906-6-05(B)(8) Proposed Easements, Options, and Land Use Agreements***

It is AEP Ohio Transco's understanding that the Project will be constructed within land owned and/or controlled by GPS. The 100-foot wide Interconnection ROW and associated access will continue in GPS ownership and control, while land, infrastructure, and the access road associated with the 100-foot wide Eastern and Western Line Tap ROWs, the Eastern and Western Distribution ROWs, and the Utility Switchyard will be transferred to AEP Ohio Transco upon completion of construction.

#### ***4906-6-05(B)(9) Technical Features of the Project***

##### ***4906-6-05(B)(9)(a) Description of Technical Features***

AEP Ohio Transco's Project will be designed for and operated at 765 kV, and will consist of:

- Two steel monopole dead-end structures (2A and 3A), constructed within the 0.3-mile Western Line Tap ROW;
- Two steel monopole dead-end structures (2C and 3C), constructed within the 0.3-mile Eastern Line Tap ROW;

##### ***4906-6-05(B)(9)(a) Number and Type of Structures***

As shown on Figure 2, two steel dead-end structures (2A and 3A) are proposed within the Western Line Tap ROW and two steel dead-end structures (2C and 3C) are proposed within the Eastern Line Tap ROW. Typical drawings of these structures are provided in Figure 3.

*4906-6-05(B)(9)(a) Right-of-Way and Land Requirements*

As discussed above, GPS will control all property on which the Project is proposed. Use of that easement will also be conferred to AEP upon completion of construction. No other land rights will be required.

*4906-6-05(B)(9)(b) Calculated Electric and Magnetic Field Levels, Line Loadings & Rating*

Not required, as no component of the electrical interconnection is located within 100 feet of an occupied residence or institution.

*4906-6-05(B)(9)(c) Estimated Capital Costs*

The estimated capital cost for the proposed Project, which is composed of applicable tangible and capital costs, is approximately \$1,000,000.

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

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

The Project is located entirely within Guernsey County, approximately 0.15 mile west of Interstate 77 and approximately 0.6 mile north of Clay Pike. Guernsey County has a population of 40,087<sup>2</sup> and has an area of 522 square miles. Therefore, population density in the area is assumed to be 76.8 people per square mile.

As shown in Figure 6, land uses in the immediate area around the Project consist of commercial/industrial, agricultural production, utility infrastructure, and forested area.

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<sup>2</sup> 2010 United States Census



A residential neighborhood is located approximately 0.4 mile south of the Project, with scattered residences located to the north and east. Interstate 77 is located approximately 0.15 mile to the east; gas lines, transmission lines, rail lines, and industrial and commercial development exist along the nearby roadways, particularly along Clay Pike Road to the south. Agricultural fields are prominent, with pockets of forested area; large scale utility easements, including overhead electric transmission lines, traverse the area in all directions. A mixture of agricultural, forest, residential, and commercial/industrial land use extends in all directions around the Project.

The Project is proposed on land located within undeveloped, forested and agricultural area. As shown in Figure 7, no residential structures exist within 100 feet of the Project. A network of wetlands was delineated on the property, and components have been designed to minimize impacts to the greatest extent possible.

There will be no public access to the Project, as it will be located on private property.

#### *4906-6-05(B)(10)(b) Location and Description of Existing Agricultural Districts*

The Project is not proposed within the limits of an Agricultural District, as defined by Chapter 929 of the Ohio Revised Code, although a portion of the land is currently in agricultural use as a hay field.

No significant impact to the continued meaningfulness of registered landmarks of historic, religious, archaeological, scenic, natural or other cultural significant resource is anticipated as a result of the Project.

A Phase I archaeological investigation was conducted for the 25-acre Interconnection Property in May 2017. These investigations involved surface collection, subsurface testing, and visual inspection. The work resulted in the identification of three prehistoric archaeological sites (Sites 33GU0301, 33GU0302, and 33GU0303). Each site is a low density lithic scatter of unknown age. Based on the Phase I survey, all three sites lack the research potential to provide significant information regarding the prehistory of the region due to the limited size of the assemblage and lack of tools or other diagnostic artifacts. In addition, significant disturbances to the landform from the excavation of field drainage ditches has negatively impacted the integrity of these sites. As such, these resources were not recommended eligible for listing in the National Register of Historic Places and no additional archaeological investigations were recommended.

No cultural resource landmarks or historic structures are located within the area of the Project. The Interconnection ROW, Eastern Line Tap ROW, and Western Line Tap ROWs will each include two 150-foot tall T-frame structures (Figure 3), but will also be surrounded by wooded vegetation. In addition to the vegetative buffer, the Project is proposed proximate to similar uses, in a setting where viewers are accustomed to seeing transmission structures, including poles and wires, and will not reflect a significant change in the visual landscape, should any portion of the structures be visible.

A Historic Architecture Reconnaissance analysis was completed in February 2017 for a 1-mile radius around the 118-acre Generating Facility Site and 25-acre Interconnection Property to account for resources that may have potential views of the Generating Facility or any of the above-ground ancillary components. This 1-mile radius was defined as the indirect Area of Potential Effects (APE). The reconnaissance survey identified 70 historic architectural resources, of which seven resources were recommended for further study.

On May 23, 2017, GPS submitted both the archaeology and historic structures reports to the Ohio History Connection (OHC), which serves as the State of Ohio's Historic Preservation Office (OHPO). Report revisions were submitted at the request of the OHPO in July 2017. It is AEP Ohio Transco's understanding that formal comments from the OHPO are pending.

*4906-6-05(B)(10)(d) Local, State, and Federal Agencies with Requirements Applicable to the Project*

The Project will be designed, constructed, and operated to meet or exceed the requirements of the National Electric Safety Code, AEP design standards, and all applicable Occupational Safety and Health Administration standards. Anticipated environmental permits required for construction of the Project, in addition to this filing with the OPSB, include an individual permit from the United States Army Corps of Engineers (USACE) and an Ohio Environmental Protection Agency (Ohio EPA) stormwater General Permit for construction and water quality certification. As soon as the permits are received, AEP Ohio Transco will provide them.

Other federal, state, and local agencies with requirements anticipated for the Project are outlined in Table 2, along with references to applicable documentation provided as attachments to this LON.

**TABLE 2.  
LOCAL, STATE, AND FEDERAL AGENCIES WITH REQUIREMENTS TO BE MET  
BY THE PROJECT**

<b>Name of Agency</b>	<b>Documents Submitted</b>	<b>Attachment</b>
USACE	Aquatic Resource Report, Guernsey Power Station, Volume 2 – Interconnection Property, June 2017	E
	Guernsey Power Station – Individual Wetland Permit Application, File No. 2017-00244 – Submitted on July 5, 2017	E
	Approved Permit for Wetland Impact*	To be obtained
U.S. Fish & Wildlife Service (USFWS)	USFWS Response, dated August 17, 2016	F
Ohio Department of Natural Resources (ODNR)	ODNR Response, dated August 2, 2016	F
	ODNR Response, dated September 16, 2016	F
OHC	Phase I Archaeological Survey, Guernsey Power Station Interconnection Property, May 2017 – Submitted on May 23, 2017	Not provided; pending OHPO review
	Historic Architecture Reconnaissance Survey, Guernsey Power Station, May 2017 – Submitted on May 23, 2017	
	OHC Response	Pending
Ohio EPA	General Permit (Stormwater)	Prior to construction
Ohio EPA	Water Quality Certification	To be obtained
Ohio Department of Transportation	Heavy Haul Construction Equipment and Manufactured Component Permits	Prior to heavy haul
*Wetland impact associated with the Project will be covered under the USACE Individual Permit obtained for the Generating Facility.		

There are no other known local, state or federal requirements that must be met prior to commencement of construction on the proposed Project. AEP Ohio Transco requests that the Staff

Report contain a similar condition to Condition No. 1 in the Staff Report issued on January 23, 2017 in Vectren Energy Delivery of Ohio Cemex-Morris Bean Pipeline Replacement Project (Case No. 16-2175-GA-BLN). That condition stated that Applicant shall obtain and comply with permits or authorizations “prior to the commencement of construction activities in areas that require permits or authorizations.”

*4906-6-05(B)(10)(e) Federal and State Designated Species*

Correspondence from the USFWS dated August 17, 2016 (Attachment F) indicated there were no federal wilderness areas, wildlife refuges or designated critical habitat within the vicinity of the Generating Facility Site (Attachment F). In order to avoid/minimize impacts on the identified federally endangered Indiana bat (*Myotis sodalis*) and federally threatened northern long-eared bat (*Myotis septentrionalis*), the limited tree clearing required will only occur between October 1 and March 31.

A response letter to GPS from the ODNR dated August 2, 2016 (Attachment F) provided shapefiles that indicated no records in their database of unique ecological attributes or rare or endangered species within 1 mile of the Generating Facility or its ancillary features.

Additional correspondence from ODNR was received by GPS on September 16, 2016. In addition to the species previously noted, the letter references the northern harrier (*Circus cyaneus*) and the black bear (*Ursus americanus*). ODNR also stated that the project must not have an impact on freshwater native mussels. Given that no activity associated with the Project will involve in water work, no impact to mussel species is anticipated.

The northern harrier is a ground-nesting bird typically found in large marshes and grasslands from May 15 until August 1. AEP Ohio Transco will consult with ODNR to

determine whether any portions of the Project may be considered suitable nesting habitat, and will avoid incurring construction impacts in such areas during the nesting season of this species.

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

The ODNR was contacted by GPS regarding areas of ecological concern in the vicinity of the Project. A response letter to GPS from ODNR dated August 2, 2016 did not identify any unique ecological sites, geologic features, animal assemblages, scenic rivers, state wildlife areas nature preserves, parks, forests, national wildlife refuges or other protected natural areas within a 1-mile radius of the Project area. A copy of their response is provided in Attachment F.

As part of activities associated with the GPS Generating Facility, wetland delineations were completed in December 2016 and June 2017. Results of these delineations for the Project are shown in Figure 8 and described in more detail in Attachment E. The network of wetlands delineated around Wills Creek appear to be associated with its Federal Emergency Management Agency mapped 100-year flood zones, as shown in Figure 8. The Project was carefully sited to minimize impacts to ecological resources to the fullest extent possible.

The Western Line Tap ROW and Interconnection ROW will each require 0.006 acre of wetland fill that was unavoidable in siting the transmission structure (2A and 2B, respectively). Similarly, several distribution poles along each distribution line ROW will also result in unavoidable wetland impact; the Eastern Distribution ROW will require 0.01 acre of wetland fill, while the Western Distribution ROW will require 0.004 acre of wetland fill. Figure 9 illustrates these proposed impacts.

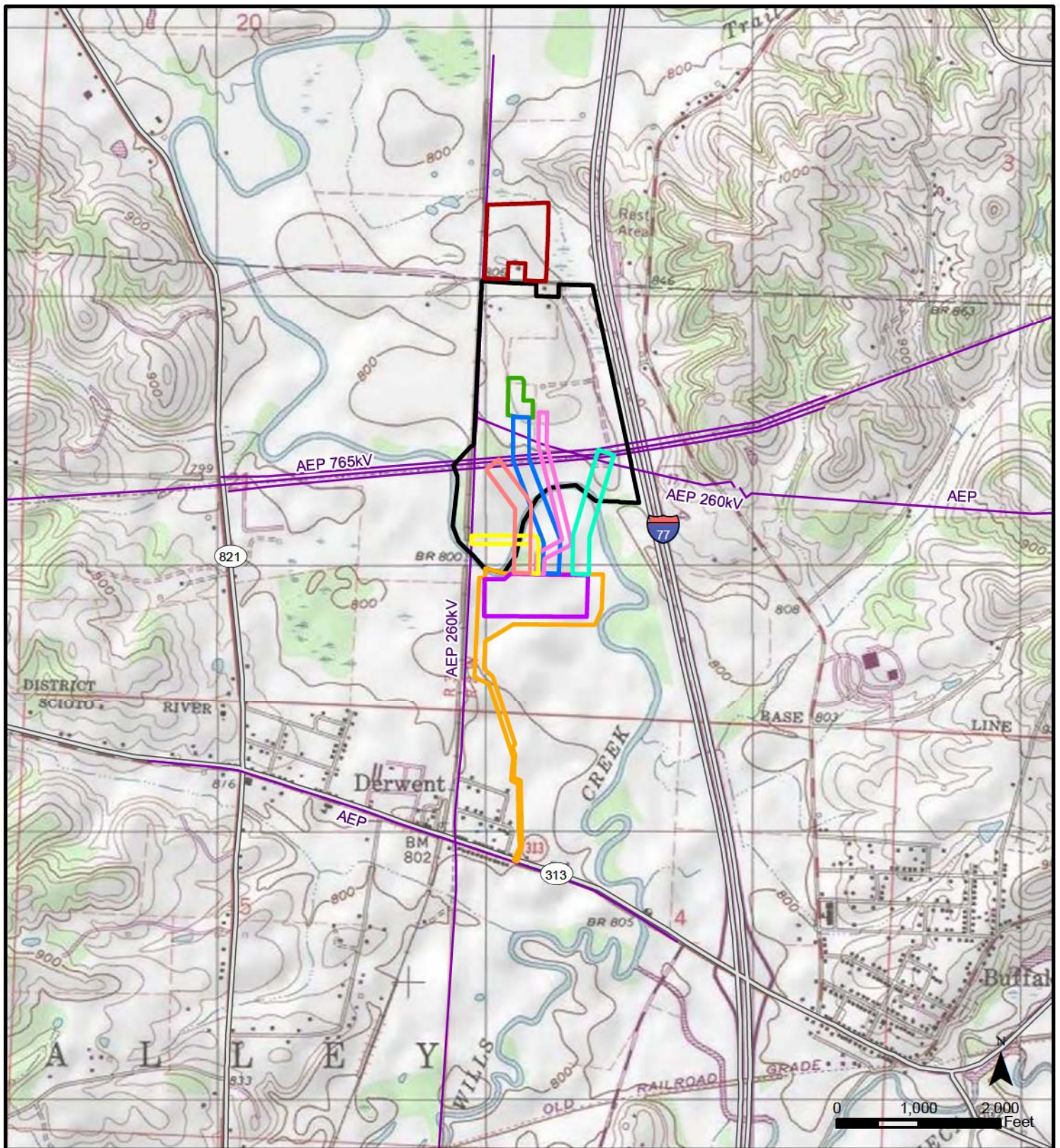
Approximately 7.1 acres of tree clearing is also associated with the GPS Electrical Interconnection that is the subject of Case No. 17-1828-EL-BLN, with approximately 6.6 acres cleared within the Interconnection ROW, Eastern Line Tap ROW, Western Line Tap ROW, Eastern Distribution ROW, and Western Distribution ROW. Of the approximately 7.1 acres of tree clearing required for the GPS Electrical Interconnection, approximately 2.7 acre of tree clearing will be required within delineated wetland resources. This may result in a change in character of the wetland, from palustrine-forested to palustrine-scrub shrub wetland, within this limited area.

As shown in Figure 6, land use within 1 mile of the Project is a mixture of agricultural, forested, utility, residential, and commercial/industrial. The closest recreational use is Jackson Park, a local park that includes a playground, pond, and several walking paths, located approximately 1.65 miles north of the proposed Project. The nearest school is the Guernsey-Noble Vocational School, located approximately 0.5 miles east of the Project, on the eastern side of Interstate 77.

*4906-6-05(B)(10)(g) Additional Information*

There are no unusual conditions that will result in significant environmental, social, health or safety impacts from the proposed electrical interconnection.





#### Legend

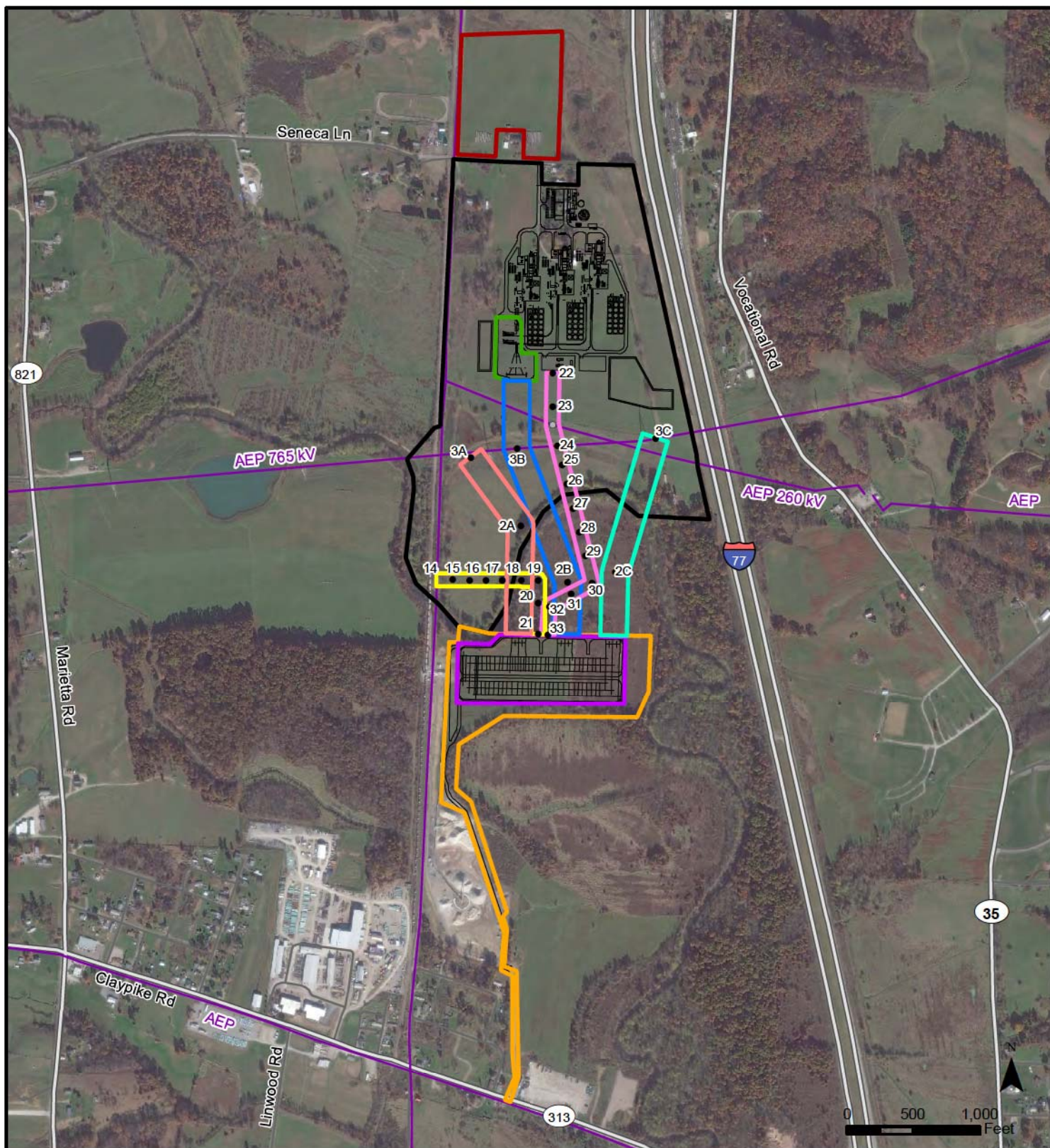
- |   |  |
|---|--|
|  Generating Facility Site |  Interconnection ROW        |
|  Proposed Laydown/Parking |  Western Line Tap ROW       |
|  Interconnection Property |  Eastern Line Tap ROW       |
|  GPS Collector Bus        |  Western Distribution ROW   |
|  Utility Switchyard       |  Eastern Distribution ROW   |
|   |  Existing Transmission Line |

**Figure 1**  
**GPS Electrical Interconnection**  
**Location**

GPS Electrical Interconnection  
Guernsey County, Ohio







#### Legend

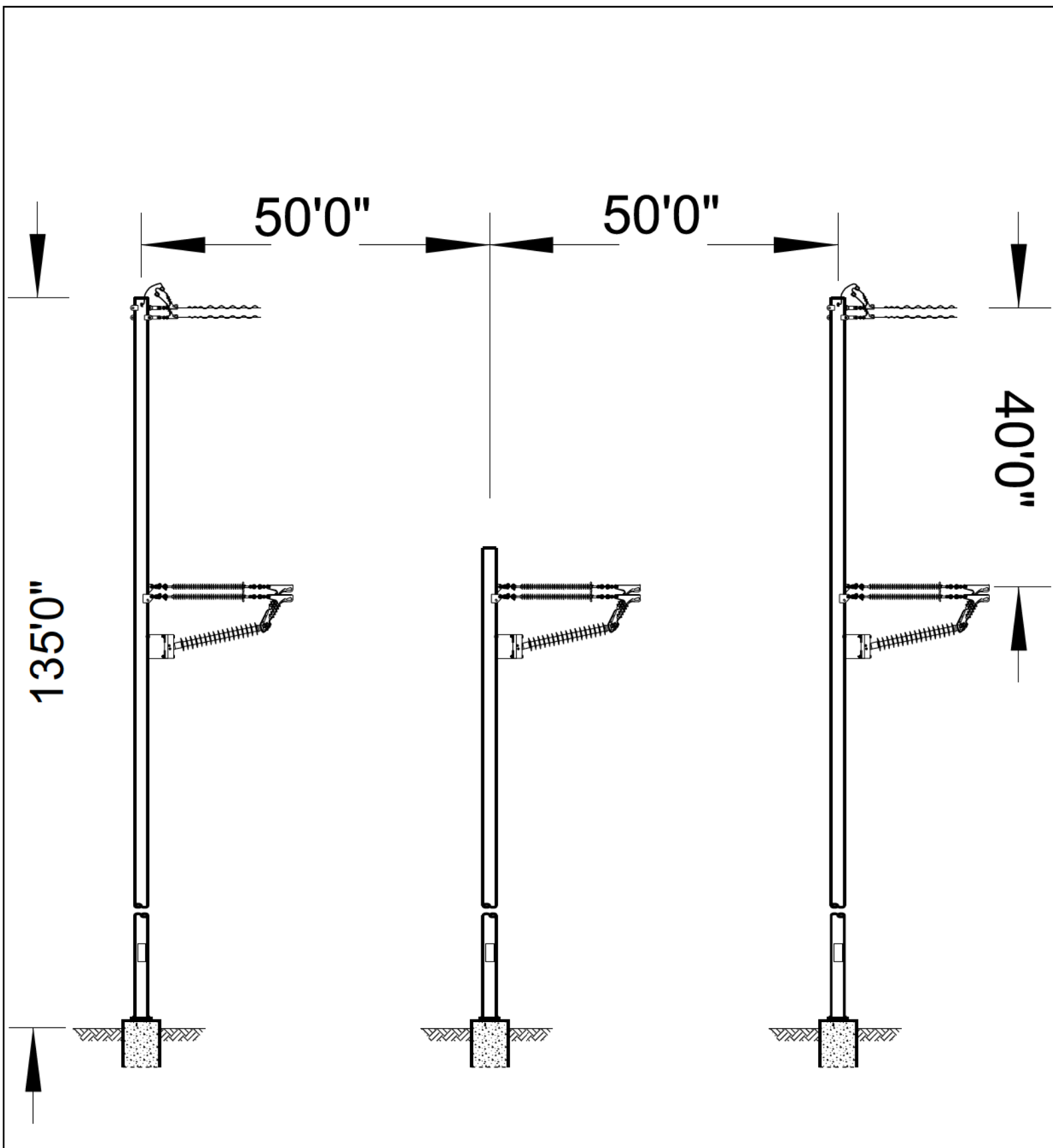
	Generating Facility Site		Interconnection ROW		Existing Transmission Line
	Proposed Laydown/Parking		Western Line Tap ROW		Proposed Pole Location
	Interconnection Property		Eastern Line Tap ROW		Existing Pole
	GPS Collector Bus		Western Distribution ROW		Highways
	Utility Switchyard		Eastern Distribution ROW		Local Roads

Imagery Source: NAIP 2015

**Figure 2**  
**GPS Electrical Interconnection Layout**

GPS Electrical Interconnection  
Guernsey County, Ohio



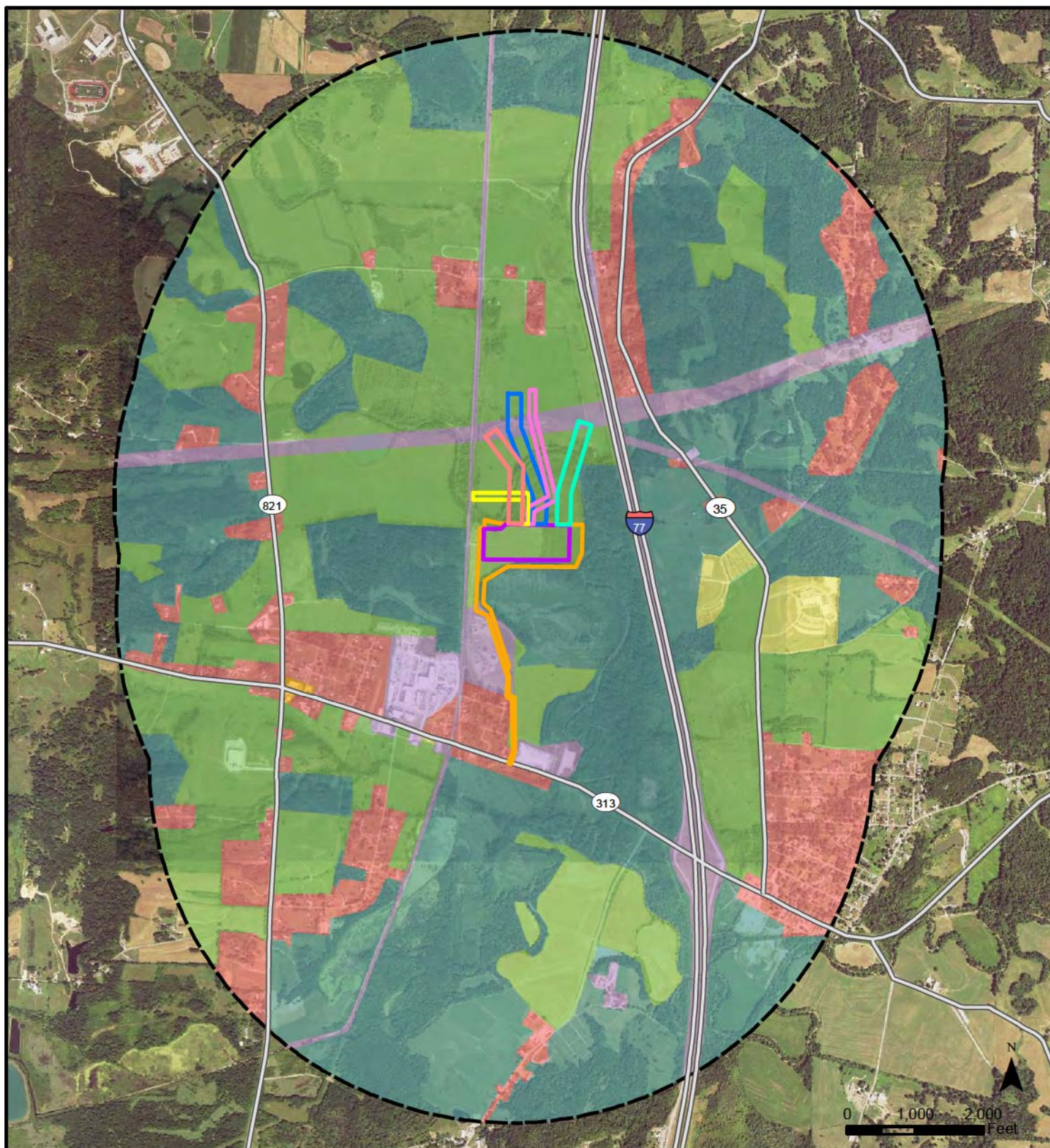


**Figure 3**  
**Typical Transmission Support Structure**

GPS Electrical Interconnection  
Guernsey County, Ohio







#### Legend

- Interconnection Property
- Utility Switchyard
- Interconnection ROW
- Western Line Tap ROW
- Eastern Line Tap ROW
- Western Distribution ROW

- Eastern Distribution ROW
- 1-mile Radius
- Land Use**
- Agricultural
- Commercial
- Forested/Open Space

- Industrial
- Institutional
- Residential

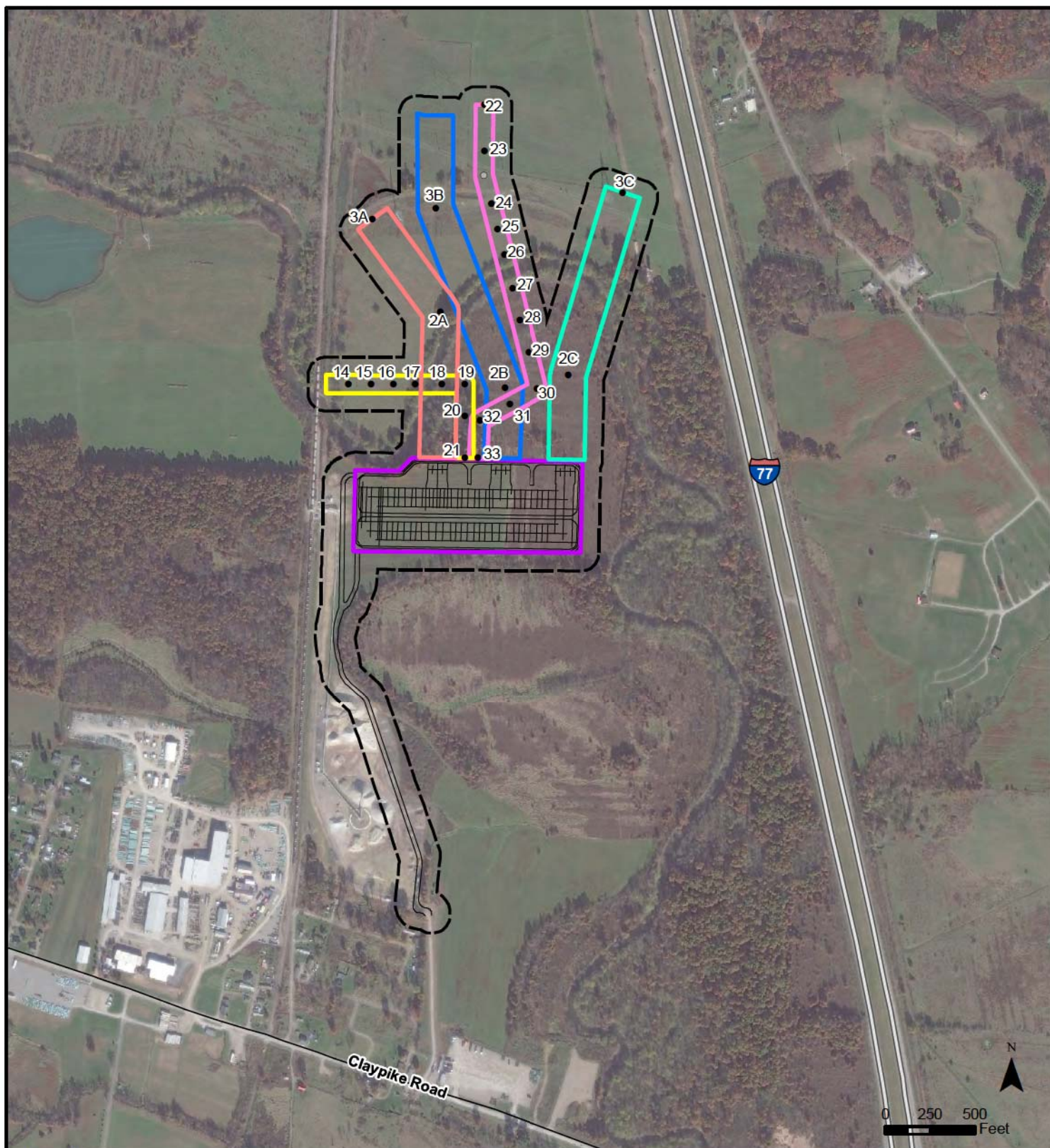
Imagery Source:  
NAIP 2015

**Figure 6**  
**Existing Land Use**

GPS Electrical Interconnection  
Guernsey County, Ohio







#### Legend

- Utility Switchyard
- Interconnection ROW
- Western Line Tap ROW
- Eastern Line Tap ROW
- Western Distribution ROW
- Eastern Distribution ROW

- 100-foot Radius
- Proposed Pole Location
- Existing Pole
- Highways
- \*No structures within 100-foot radius

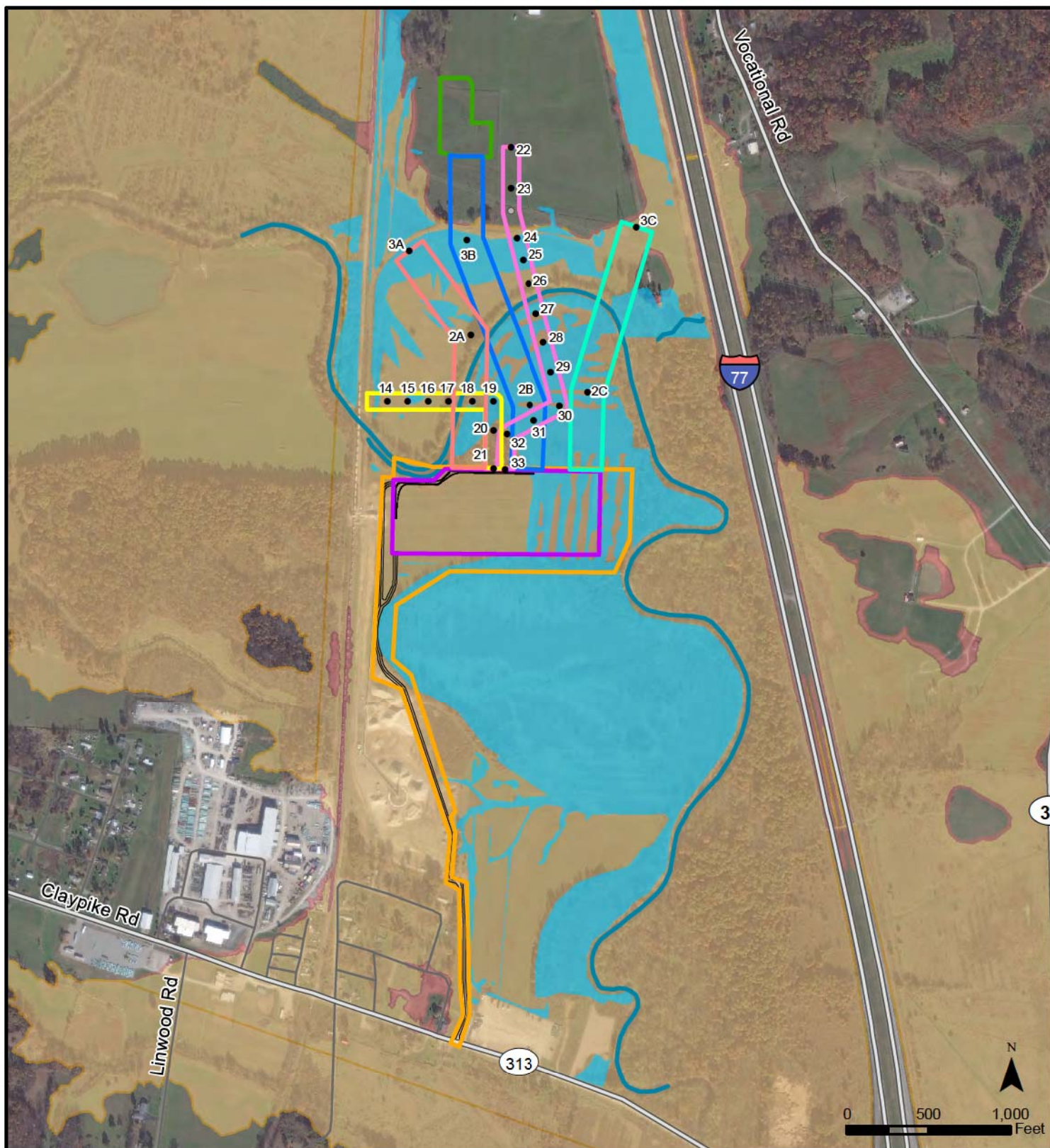
Imagery Source: NAIP 2015

**Figure 7**  
**Structures within 100 Feet**

GPS Electrical Interconnection  
Guernsey County, Ohio







#### Legend

<span style="border: 2px solid orange; padding: 2px;"> </span> Interconnection Property	<span style="border: 2px solid yellow; padding: 2px;"> </span> Western Distribution ROW	FEMA Flood Hazard Area
<span style="border: 2px solid green; padding: 2px;"> </span> GPS Collector Bus	<span style="border: 2px solid pink; padding: 2px;"> </span> Eastern Distribution ROW	<span style="background-color: yellow; border: 1px solid black; display: inline-block; width: 20px; height: 10px;"></span> 1% Annual Chance
<span style="border: 2px solid purple; padding: 2px;"> </span> Utility Switchyard	<span style="border-bottom: 2px solid gray; width: 20px; display: inline-block;"></span> Highways	<span style="background-color: pink; border: 1px solid black; display: inline-block; width: 20px; height: 10px;"></span> 0.2% Annual Chance
<span style="border: 2px solid blue; padding: 2px;"> </span> Interconnection ROW	<span style="border-bottom: 2px solid gray; width: 20px; display: inline-block;"></span> Local Roads	<span style="background-color: lightblue; border: 1px solid black; display: inline-block; width: 20px; height: 10px;"></span> Delineated Wetlands
<span style="border: 2px solid red; padding: 2px;"> </span> Western Line Tap ROW	<span style="display: inline-block; width: 0; height: 0; border-left: 5px solid transparent; border-right: 5px solid transparent; border-bottom: 10px solid black;"></span> Proposed Pole Location	<span style="border-bottom: 2px solid blue; width: 20px; display: inline-block;"></span> Delineated Streams
<span style="border: 2px solid cyan; padding: 2px;"> </span> Eastern Line Tap ROW	<span style="display: inline-block; width: 0; height: 0; border-left: 5px solid transparent; border-right: 5px solid transparent; border-bottom: 10px solid gray;"></span> Existing Pole	

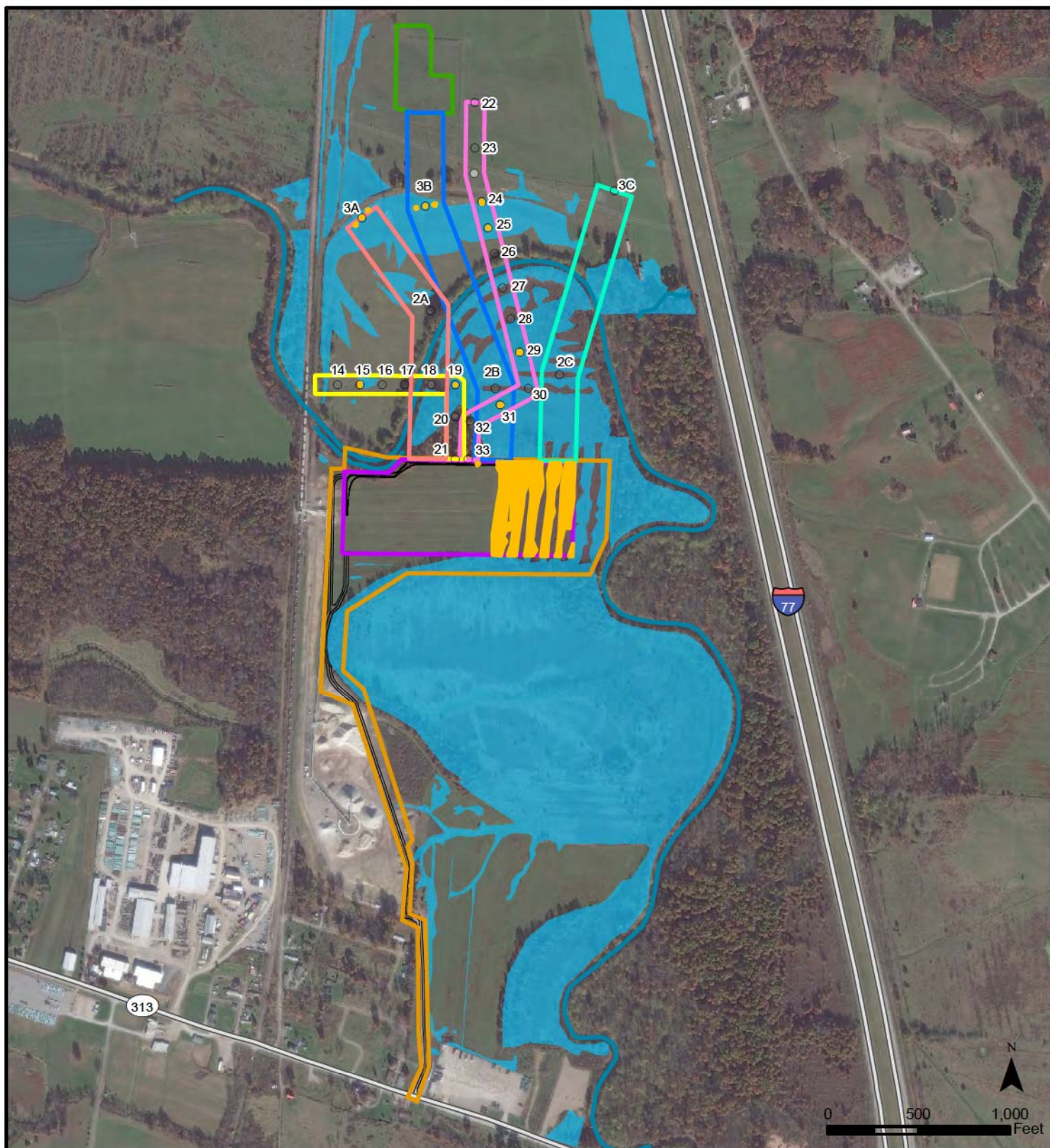
Imagery Source: NAIP 2015

**Figure 8**  
**Ecological Resources**

GPS Electrical Interconnection  
Guernsey County, Ohio







#### Legend

- |                          |                          |                        |
|--------------------------|--------------------------|------------------------|
| Interconnection Property | Western Distribution ROW | Delineated Wetlands    |
| GPS Collector Bus        | Eastern Distribution ROW | Delineated Streams     |
| Utility Switchyard       | Highways                 | Permanent Wetland Fill |
| Interconnection ROW      | Proposed Pole Location   |                        |
| Western Line Tap ROW     | Existing Pole            |                        |
| Eastern Line Tap ROW     |                          |                        |

Imagery Source: NAIP 2015

**Figure 9**  
**Ecological Impacts**

GPS Electrical Interconnection  
Guemsey County, Ohio

