Department of Energy
Washington, DC 20585

November 6, 2026

Scott Osterholt, Managing Director Federal Grants and Broadband
American Electric Power
1 Riverside Plaza
Columbus, OH 43215
ssosterholt@aep.com

Subject: U.S. Department of Energy, Office of Energy Dominance Financing, Completion of Environmental Review for American Electric Power's Grace to South Rokeby 69 kV Transmission Line Rebuild Project in Morgan County, Ohio

Dear Mr. Osterholt:

The United States Department of Energy (DOE), Office of Energy Dominance Financing (EDF) has issued a Federal loan guarantee to American Electric Power (AEP) pursuant to DOE's authority under Title XVII of the Energy Policy Act of 2005, as amended. The loan guarantee to AEP is intended to provide financing for many projects over the life of the Federal loan guarantee. Each project is reviewed and considered individually prior to being approved for financing under the Federal loan guarantee. AEP has identified the Grace to South Rokeby 69 kV Transmission Line Rebuild (Project) in Morgan County, Ohio.

The Project will rebuild approximately 12.3 miles of existing 69-kilovolt transmission line generally in the location that it exists today and expanding the existing 60-foot-wide right-of-way (ROW) to a new width of 100 feet to meet electrical clearance requirements for the new transmission line structures. Five short deviations from the centerline are required to avoid existing structures in the ROW (e.g., barn, garage, and residence) and to reduce angles along the centerline. Despite the minor deviations, the rebuilt transmission line centerline still be within the existing 60-foot ROW for most of its length. A total of 91 existing 65-foot-tall wood pole structures will be removed and replaced with 87 approximately 80-foot-tall H-frame structures or galvanized steel poles, as well as overhead conductors and shield wire. Four existing structures would remain in place along the transmission line. Access roads will consist of existing roads and temporary roads (i.e., temporary timber matting or gravel placed on the ground that would be removed and restored upon construction completion); no new access roads will be needed for construction. Some of the existing access roads may require grading to ensure a safe surface and promote adequate drainage for stormwater runoff. Work and pull pads (timber matting or gravel) will primarily be located within the existing ROW, but will occur outside of and adjacent to the ROW in some locations. While many of the work and pull pads outside of the ROW occur in previously disturbed areas, some areas will require vegetation clearing

(e.g., forest areas), and some tree trimming or removal will be required along some of the existing access roads for equipment access. However, these disturbed areas will be restored following construction and reseeded with an appropriate local seed mix to promote revegetation and site recovery. Temporary timber matting will be required in some wetlands, which is authorized under Clean Water Act Nationwide Permit 57; no in-water work in streams or surface waters would occur. The general construction process will entail erosion and sediment control installation, access road work, crane pad grading, removal of existing structures and conductors, foundation installation, structure assembly and erection, conductor/wire installation, and restoration once construction is completed.

EDF conducted the environmental reviews and consultations required by the applicable and relevant environmental statutes and Executive Orders (EOs) associated with its proposed Federal financial support. The applicable and relevant environmental statutes and EOs included:

1. Section 7 of the Endangered Species Act (16 USC 1536)
2. Section 106 of the National Historic Preservation Act (54 USC 306108)
    a. EO 13175, Consultation and Coordination With Indian Tribal Governments

Applicable and Relevant Environmental Review(s)

Section 7, Endangered Species Act

AEP obtained from the U.S. Fish and Wildlife Service (USFWS) an Official Species List (Project Code 2026-0097197), which resulted in the following species identified as occurring or potentially occurring in the Project area: the endangered Indiana bat, pink mucket, fanshell, sheepnose mussel, and snuffbox mussel; the threatened longsolid, rabbitsfoot, round hickorynut, and American burying beetle; and the proposed threatened monarch butterfly. In addition, the USFWS' technical assistance review letter to AEP provided comments on the endangered northern long-eared bat and the proposed endangered tricolored bat. No critical habitat is designated or proposed in the Project area. On August 5, 2026, the USFWS concurred that the Project would be *not likely to adversely affect* the Indiana bat and northern long-eared bat, based on the following condition that AEP must implement:

> Trees ≥ 3 inches in diameter at breast height (dbh) must be trimmed or cleared between October 1 and March 31.

EDF made *no effect* determinations for the seven aquatic species – pink mucket, fanshell, sheepnose mussel, snuffbox mussel, longsolid, rabbitsfoot, round hickorynut – because there would be no in-water work and erosion and sediment control measures would be in place for any ground disturbance.

For the American burying beetle, the USFWS' technical assistance letter to AEP for the Project did not indicate any potential concerns or issues with this species in or around the Project, and therefore, EDF made a *no effect* determination.

EDF has determined the Project would *not likely jeopardize the continued existence* of the proposed monarch butterfly. Construction of the rebuild would involve limited ground disturbance that would occur primarily within an already existing ROW or along the temporary access roads. Restoration of all temporarily disturbed areas with native seed mixes will minimize any impact. In addition, EDF does not anticipate a USFWS decision on whether to formally list the monarch butterfly in the immediate future; as reflected in the Trump Administration's Unified Agenda of Regulatory and Deregulatory Actions, the final listing determination for the species is included as a "long-term action."

As mentioned above, the USFWS also provided comment on the proposed tricolored bat. The tricolored bat has similar habitat requirements and stressors as the Indiana bat and the northern long-eared bat. The tree clearing measure stated above would effectively apply to the tricolored bat and result in the same outcome and conclusions. However, since the tricolored bat is a proposed species, the threshold of analysis is different. As such, EDF has determined that the Project would *not likely jeopardize the continued existence* of the tricolored bat.

Section 106, National Historic Preservation Act

In accordance with the National Historic Preservation Act (NHPA), EDF consulted with the Ohio State Historic Preservation Office (SHPO). On September 1, 2026, the Ohio SHPO concurred with EDF's finding of No Adverse Effect for architectural resources and archaeological resources. After this initial SHPO consultation, EDF consulted the Ohio SHPO for a second time on two small access road changes, in which SHPO concurred with EDF's finding of No Adverse Effect (October 30, 2026). EDF identified and contacted six (6) federally recognized Native American Indian Tribes (Tribes) that may have an interest in the Project area: Delaware Nation, Oklahoma; Delaware Tribe of Indians; Eastern Shawnee Tribe of Oklahoma; Miami Tribe of Oklahoma; The Osage Nation; and Seneca-Cayuga Nation. The Osage Nation responded and stated they do not anticipate the Project will adversely impact any cultural resources or human remains protected under NHPA, National Environmental Policy Act, the Native American Graves Protection and Repatriation Act, or Osage law. No other comments were received from the remaining Tribes.

Conclusion

With this letter, EDF confirms that it has completed the environmental reviews and consultations required by the applicable and relevant environmental statutes and Executive Orders (EOs) associated with its proposed Federal financial support.

EDF notes that AEP is responsible for obtaining permits, approvals, and/or authorizations required for the construction and/or operation of the Project.

EDF will continue with the environmental due diligence reviews, as needed.

Respectfully,

ALICIA WILLIAMSON

Digitally signed by ALICIA WILLIAMSON
Date: 2026.11.06 14:49:38 -05'00'

Alicia Willliamson
Senior Environmental Manager
Office of Energy Dominance Financing

cc: Denis O'Meara, EDF Utilities Vertical Lead
David Johnson, EDF Environmental Project Manager
Marla Waters, Project Manager, American Electric Power
Yolanda Gorman, Project Manager, American Electric Power
Rachel Shifman, EDF Portfolio Management Division
Nicholas Davidson, EDF Portfolio Management Division