Department of Energy
Washington, DC 20585

November 10, 2026

Scott Osterholt, Managing Director Federal Grants and Broadband
American Electric Power
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Subject: U.S. Department of Energy, Office of Energy Dominance Financing, Completion of Environmental Review for American Electric Power's Haviland to Paulding 69 kV Transmission Line Rebuild Project in Paulding 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 Haviland to Paulding 69 kV Transmission Line Rebuild (Project) in Paulding County, Ohio.

The Project will rebuild approximately 10.7 miles of existing 69-kilovolt transmission line generally in the location that it exists today and expanding the existing 50-foot-wide right-of-way (ROW) to a new width of 60 feet to meet electrical clearance requirements for the new transmission line structures. One deviation is required to avoid conflicts with an unrelated wind turbine project under development, which would result in the abandonment of approximately 0.8 mile of existing transmission line and establishment of approximately 0.8 mile of new ROW. A total of 145 existing wood pole structures (55 to 85 feet in height) and 31 galvanized steel poles (80 to 90 feet in height) will be removed and replaced with 180 galvanized steel pole structures (70 to 120 feet in height), as well as overhead conductors and shield wire. 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 very small areas will require vegetation clearing (e.g., trees), 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 two wetlands and 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. Construction is anticipated to begin December 1, 2026, with Project operation by October 8, 2027.

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
3. Farmland Protection Policy Act (7 USC 4201-4209)

Applicable and Relevant Environmental Review(s)

Section 7, Endangered Species Act (ESA)

EDF generated an official ESA species list using the U.S. Fish and Wildlife Service's (USFWS) Information for Planning and Consultation (IPaC) website, which identified the following species as potentially occurring in the Project area: endangered Indiana bat, proposed endangered tricolored bat, whooping crane (experimental population, non-essential), and proposed threatened monarch butterfly. According to the USFWS IPaC results, no designated or proposed critical habitat was identified within the Project area.

EDF utilized the USFWS' All Ohio Bat Dkey in IPaC, and on October 6, 2026, obtained a *may affect, not likely to adversely affect* determination for the Indiana bat and tricolored bat. After the 30-day Dkey verification period, the USFWS did not provide any further comment on the Project, and therefore, USFWS officially concurred with EDF's determinations on November 5, 2026. USFWS' concurrence is based on the following conservation measures that AEP must implement as part of the Project:

1. Trees ≥ 3 inches in diameter at breast height (dbh) must be trimmed or cleared between October 1 and March 31.
2. Tree cutting/trimming will not exceed 5 acres of forest.
3. Tree cutting/trimming will not fragment a connective corridor between 2 or more forest patches of at least 5 acres.

As a proposed species, the monarch butterfly has a different threshold of analysis and the Federal action agency is required to determine if their action would be likely to jeopardize the continued existence of the species, and if so, request a Conference Consultation with the USFWS. EDF does not believe the Project would be likely to jeopardize the continued

existence of the species given the low potential for high-quality habitat and the generally disturbed nature of the existing Project area. 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." Similarly, the whooping crane as an experimental population (non-essential) species is treated as a proposed species on private lands under ESA. Like the monarch butterfly, because the Project has limited whooping crane habitat (no large open waters and wetlands but some agriculture lands), EDF does not believe the Project is likely to jeopardize the continued existence of the species. In addition, because the whooping crane is an experimental population, there is no potential for this population of the species to be formally listed.

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 October 29, 2026, the Ohio SHPO concurred with EDF's finding of No Adverse Effect for architectural resources and archaeological resources. The Ohio SHPO provided the following request in their concurrence letter: If additional archaeological resources are discovered during implementation of the Project, then the Ohio SHPO office should be contacted as required by 36 CFR 800.13.

EDF identified and contacted thirteen (13) federally recognized Native American Indian Tribes (Tribes) that may have an interest in the Project area: Citizen Potawatomi Nation, Oklahoma; Eastern Shawnee Tribe of Oklahoma; Forest County Potawatomi Community, Wisconsin; Hannahville Indian Community, Michigan; Little Traverse Bay Bands of Odawa Indians, Michigan; Match-e-be-nash-she-wish Band of Pottawatomi Indians of Michigan; Miami Tribe of Oklahoma; Ottawa Tribe of Oklahoma; Peoria Tribe of Indians of Oklahoma; Prairie Band Potawatomi Nation; Seneca-Cayuga Nation; Shawnee Tribe; and Wyandotte Nation. The Wyandotte Nation responded on November 6, 2026, with a request for some additional information on EDF's environmental review process but provided no comments pursuant to Section 106 or Tribal resources. EDF replied to the Wyandotte Nation on November 10, 2026. On November 5, 2026, the Shawnee Tribe responded and concurred that no known historic properties would be negatively impacted by the Project, but requested that they be contacted in the event of an inadvertent discovery of archaeological materials or human remains.

No other Tribes responded to EDF's invite to consult on the Project.

Farmland Protection Policy Act (7 USC 4201-4209)

The Project requires the establishment of 0.8 mile of new ROW to avoid conflicts with an unrelated wind turbine project under development. This new segment of ROW crosses prime farmland, and the placement of 14 new poles in this ROW would permanently convert approximately 0.4 acre of prime farmland. While there would be a small area of permanent conversion from the poles, the rest of the area within the ROW would not be permanently converted since there would be no permanent obstruction to planting of crops

under or around the transmission line. Per the requirements of the Farmland Protection Policy Act (FPPA), EDF consulted the U.S. Department of Agriculture's Natural Resources Conservation Service Ohio State Office and completed the Farmland Conversion Rating Impact form (CPA-106 form) to assess potential impacts on farmland. Completion of the form produced a total point score less than 160, and per FPPA regulations, no further consideration for protection is required and no alternative project sites need to be evaluated.

Conclusion

With this letter, EDF confirms that it has completed the environmental reviews and consultations required by the applicable and relevant environmental statutes and 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,

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