

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio Power Company for an Increase in Electric Distribution Rates.)	Case No. 25-0392-EL-AIR
)	
)	
In the Matter of the Application of Ohio Power Company for Tariff Approval.)	Case No. 25-0393-EL-ATA
)	
)	
In the Matter of the Application of Ohio Power Company for Approval to Change Accounting Methods.)	Case No. 25-0394-EL-AAM
)	
)	

**SUPPLEMENTAL TESTIMONY OF MOLLY JO STANLEY
ON BEHALF OF
THE OHIO ENVIRONMENTAL COUNCIL
January 20, 2026**

Q.1. Please state your name, current title, and business address.

A.1. My name is Molly Jo Stanley. I am the Southeast Ohio Regional Director for the Ohio Environmental Council (OEC). The OEC's business address is 556 E. Town St., Columbus, Ohio 43215.

Q.2. Please summarize your educational background and professional experience.

A.2. I have served as the OEC's Southeast Ohio Regional Director for 4 years and live in Athens County, Ohio. In this role, I focus on the just transition away from a history of extraction that has left scars on our ecosystems and communities. I work toward an inclusive, equitable future where deeply connected communities thrive in relationship with the places we depend on. I also teach two annual Honors-level courses at Ohio University which examine the history Public Lands in the United States, and Southeastern Ohio's

1 land-use history. I graduated from Hocking College's Department of Natural Resources in
2 2006, and from Antioch University in 2019 with a Master's in Education. I have studied,
3 practiced, and taught ecology, land stewardship, and ethnobotany for 20 years. I am also
4 working to support local efforts to expand native fruit and nut processing, ecological
5 education, and recreation to establish sustainable economic opportunities for Southeast
6 Ohio communities. These efforts include support of Rising Appalachia's Ecological
7 Apprenticeship programs and former coal mining reclamation efforts. Solid Ground Farm
8 and my home across the road is served by AEP Ohio's distribution utility.

9 **Q.3. On whose behalf are you offering testimony?**

10 **A.3.** I am testifying on behalf of the Ohio Environmental Council (OEC).

11 **Q.4. What is the purpose of your testimony?**

12 **A.4.** The purpose of my testimony is to oppose the approved Enhanced Service
13 Reliability Rider (ESRR) caps in the settlement. I will explain the OEC's opposition to
14 increasing the ESRR caps without requirements to improve AEP Ohio's vegetation
15 management practices to reduce costs and prevent the proliferation of invasive species and
16 degraded ecosystems. I will also describe what I have witnessed of AEP Ohio and its
17 contractors' vegetation management practices in Athens County. I hope that my testimony
18 will provide helpful insight to improve vegetation management practices that decreases
19 long term costs to AEP Ohio and its customers, improves ecosystems in the AEP Ohio
20 distributions lines rights-of-way, and provides benefits to the communities in which these
21 ecosystems are located.

22 **Q.5. Have you testified previously before the Public Utilities Commission of Ohio?**

23 **A.5.** No.

1 **Q.6. Have you previously served as an expert witness before any other court, agency, or**
2 **other body on the subject you plan to offer testimony on today?**

3 **A.6.** No.

4 **Q.7. What is your personal experience with AEP Ohio's vegetation management**
5 **practices with respect to herbicide application?**

6 **A.7.** Earlier this year, AEP Ohio approached landowners in my area, Dover Township,
7 with requests to spray the vegetation near distribution lines on their property. They
8 approached homeowners identifying themselves as working for AEP Ohio. I was present
9 for 3 of these conversations. My neighbors, friends and colleagues also informed me of
10 these conversations. For those landowners who opted out of herbicide application, the
11 company or its contractor trimmed or cut down vegetation surrounding and underneath the
12 distribution lines.

13 I also saw helicopters cutting branches and trees overhanging the distribution power
14 lines. This cutting occurred during June and continued intermittently until late 2025; these
15 cuttings often took place during the nesting season for migratory and resident bird species
16 in the area, including Cerulean Warblers, Baltimore Orioles, Grosbeaks, Vireos,
17 Flycatchers, Nuthatches, Tree Swallow and Goldfinches.

18 Later in the summer, I witnessed herbicide application (the results of apparent
19 broad-foliar- herbicide application), which also occurred during bird nesting season and
20 pollinator breeding, feeding, and migration season. The herbicide application left behind
21 large swaths of dead plant material and would have certainly impacted any species resting,
22 eating, or laying eggs on these plants.

1 After the herbicide applications, the standing dead plants were left behind on the
2 landowners' property or municipal and state rights of way. Not only is this extremely
3 unsightly, but it indicates that these harmful chemical residues remained (and remain still)
4 present where beneficial organisms—birds, pollinators, etc.—would be exposed if they
5 were nesting, eating, or laying eggs on these plants.

6 In the instance of the tree trimming practices, after trimming, much of the plant
7 material was left in place—often in large piles that serve as perfect conditions for invasive
8 plant species like multiflora rose, Japanese honeysuckle, and oriental bittersweet to take
9 root and proliferate, becoming extremely difficult to navigate and manage in the future.

10 In some cases, I have seen AEP Ohio or its contractors remove or chip high-value
11 fuel wood for burning in home fireplaces and stoves. In my rural area, many residents have
12 a high energy burden and/or are not served by natural gas infrastructure. As a result, many
13 of my community members (like myself and my neighbors) rely on wood to heat their
14 homes and fuel their stoves.

15 **Q.8. What are the best practices for herbicide application?**

16 **A.8.** Herbicide applications as part of vegetation management are best done as spot
17 treatments, targeting specific areas of the plant. Ideally, plants considered unwanted due to
18 their presence in the right-of-ways should be cut down to their base, with herbicide applied
19 directly onto the stem. These spot treatments are preferred over aerial applications which
20 are indiscriminate and affect healthy, unobtrusive plant life, as well as pollinators and other
21 species that come into contact with the vegetation. This indiscriminate application can also
22 reach the root systems and soil, damaging the soil ecosystem and the myriad of microbes,
23 invertebrates, and fungal networks that serve as the foundation for overall ecosystem

1 health. By removing leaves and aerial parts of plants prior to herbicide application, insects
2 and other beneficial organisms will be less impacted. Following any herbicide application,
3 the affected plant material should be removed from the area to prevent the spread of these
4 chemicals to healthy plants which support the natural ecosystems in the area.

5 **Q.9. Why is it important to remove all plant matter damaged by herbicides?**

6 **A.9.** Following herbicide application, the chemicals on the affected plants remain toxic
7 to other organisms, and in extreme weather (like heavy rains and winds) can spread to
8 nearby, healthy plant matter—which supports the local ecosystem and poses no threat to
9 the distribution lines—and can infiltrate the soil. Eliminating all plant matter without
10 protecting the soil or planting desired native species creates conditions that favor invasive
11 plant species growth and proliferation, which can only further perpetuate the need for more
12 involved vegetation management in the future. Distribution lines are typically located in
13 edge habitats which hold important ecological value and are particularly vulnerable to
14 invasive species colonization.

15 **Q.10. What is an edge habitat?**

16 **A.10.** An edge habitat is an area located between two distinct habitats such as the area
17 between a forest and a prairie or grassy area. “The edge is where the action is.” These are
18 typically ecologically robust areas for wildlife including ground nesting birds. A poorly
19 managed edge habitat is at high risk for the growth and proliferation of invasive species.

20 **Q. 11. Why is it important to follow these best practices described above?**

21 **A.11.** Practices which indiscriminately kill vegetation or leave cut or damaged vegetation
22 create conditions which will only encourage the spread of invasive species and lead to more

1 costly vegetation management practices in the future, while negatively impacting native
2 habitats and the species dependent on native plants.

3 Plant matter that is left behind without being chipped or deliberately arranged
4 creates additional work and potential risks for landowner, the public, and AEP Ohio
5 workers and contractors. For example, stacks of woody debris creates ideal habitat for
6 multiflora rose and copperhead snakes.

7 **Q. 12 What are your recommendations for AEP Ohio to implement as part of its**
8 **vegetation management practices?**

9 **A.12.** I believe AEP Ohio has an opportunity to improve ecological management practices
10 that decrease costs associated with perpetual maintenance cycles, improve ecological
11 health and resilience, and benefit local communities. It is my opinion that AEP Ohio has
12 an opportunity to partner with communities to contract with local, skilled, and
13 knowledgeable land management professionals to create mutually beneficial vegetation
14 management protocols. Vegetation that is impeding distribution lines can be thoughtfully
15 removed at the appropriate times of year to reduce impact on wildlife and sensitive bird
16 populations, while providing wood fuel and other resources to local communities.
17 Transitioning the ecology of distribution lines to native plant communities congruous with
18 distribution line maintenance needs would create healthy, resilient, beneficial ecosystems
19 and habitat with a myriad of benefits: for instance, place-based management plans could
20 be developed to create native warm-season grassland prairies that provide habitat for quail,
21 grouse, white-tailed deer, and other important species. In the long-term, this would reduce
22 costs to AEP Ohio while providing food, resources, workforce training, and economic
23 opportunities for local communities.

1 At the very least, I recommend that AEP Ohio and its contractors cut down
2 vegetation intended for herbicide application and implement spot treatment on stems; and
3 chip in place vegetation trimmed or cut during their vegetation management cycles. I also
4 recommend that AEP Ohio work with local counties and townships to create a wood bank
5 in the areas where they most frequently remove trees to ensure the local community
6 members with high energy burdens benefit from any high-value fuel wood cut during
7 management projects. Finally, I recommend that AEP Ohio reseed areas with significant
8 vegetation removal or herbicide application to encourage the growth of native species and
9 healthy habitats which will prevent the propagation and easy spread of invasive species.

10 **Q.13. Does the Settlement address these recommendations?**

11 **A.13.** No, the Settlement increases the ESRR caps for the remainder of the ESP V term
12 without any improvement to AEP Ohio's vegetation management practices. The only
13 additional conditions in the settlement are a cost-benefit analysis and restriction on a
14 portion of the caps for solely managing trees outside the right of way. The requirement for
15 a cost-benefit analysis does not provide meaningful oversight because AEP Ohio will not
16 file until after the ESP V term is complete, and the money has already been spent. The
17 restriction on money dedicated to trimming outside the right of way is also not a meaningful
18 restriction without any changes to AEP Ohio's vegetation management practices.

19 **Q.14. Is the Settlement's reduction in the ESRR caps a good thing for consumers?**

20 **A.14.** While the reduction in spending caps for vegetation management could be helpful
21 for consumers in the short term, I cannot say whether these new caps are a good thing. My
22 concern and opinion is that in the long run, without appropriate changes to vegetation

management practices, costs associated with vegetation management will continue to rise over time, which will impact consumers.

Q.15. What is your experience managing invasive species and vegetation to achieve ecological, economic, and community benefits?

A.15. In my personal and professional work, I have been engaged with active management practices aimed at improving ecosystem health, increasing native vegetation and habitat, reducing perpetual maintenance, and decreasing costs. A successful 3-year vegetation management practice has consisted of: (year one) manual removal of invasive species, chipping woody debris to serve as a natural mulch and barrier to unwanted plant growth, and casting seeds and/or planting native saplings of desired trees and shrubs; (year two and year three) watering germinated seedlings and sapling, and selective thinning of unwanted plants; by year four, experiencing significant reduction in unwanted plant growth, with successful reintroduction and establishment of low-maintenance native flora, improved habitat for native fauna, and increased ecosystem resilience in the event of future disturbances. Initial overhead of labor, seed and plant material, and tool maintenance see a return on investment by year three, paying for themselves within five years.

Q.16. Would the vegetation management approach you recommend increase costs for AEP Ohio?

A.16. No. The vegetation management approach I recommend would decrease the long-term vegetation management costs for AEP Ohio and its customers. While initial overhead of developing appropriate management plans, purchasing native seeds, site preparation, and labor would not be insignificant, adoption of these practices would reverse practices that have historically created ecological sinks – areas that become increasingly costly to

1 manage over time as they become less resilient, self-sustaining ecosystems over time –
2 creating, instead, ecosystems that are complimentary to distribution-lines' maintenance,
3 safety, and subsequent grid-reliability needs; with increased resilience, able to respond to
4 and withstand future disturbances; with increased habitat for native flora and fauna, and
5 increased benefits to local communities.

6 In addition to the cost-savings for AEP Ohio and its customers over time, these practices
7 would address vegetation management concerns expressed on state and federal lands for
8 the need for increased “young, brushy habitat” for grassland birds, deer, turkey and other
9 wildlife, taking advantage of the thousands of miles of habitat managed by AEP Ohio that
10 is suitable for and conducive to this type of habitat and subsequent management.

11 **Q.17. Does this conclude your testimony?**

12 **A.17.** Yes. However, I reserve the right to update my testimony to respond to any further
13 testimony, reports, and/or evidence submitted in this case.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing *Testimony of Molly Jo Stanley* was served this 20th day of January 2026 via electronic mail upon the following parties of record.

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