

FirstEnergy ATSI – Need No. ATSI-2026-048

OCC appreciates FirstEnergy's presentation of Need No. ATSI-2026-048. Because this project is being presented during the **Needs** stage of the M-3 process, OCC's comments are directed to whether the identified operational issue has been sufficiently documented to support advancement to the Solutions phase.

Unlike the other Ohio presentations, ATSI's project is not customer driven. Rather, FirstEnergy identifies an operational limitation associated with maintenance outages on the Chamberlain Harding 345-kV S-21 transmission line caused by terminal equipment limitations.

To facilitate meaningful stakeholder review, OCC respectfully requests additional information regarding the following.:

1. The operational significance of the identified limitation, including how frequently the maintenance condition occurs and whether it has resulted in operational restrictions, congestion, or reliability concerns.

The operational significance is as stated in the Problem Statement; FirstEnergy has identified operational constraints when a single breaker is out of service for maintenance. This breaker outage has occurred once in the past five years and has not caused operational restrictions, congestion, or reliability concerns.

2. The applicable planning criteria supporting the identified need and whether the project is intended to address reliability, operational flexibility, asset management, or a combination of these objectives.

The applicable planning criteria is FirstEnergy's System Performance Excellence Methodology section 3.4. The project is primarily to address operational flexibility concerns but will also address reliability concerns.

3. The expected operational benefits that would result from addressing the identified limitation.

The primary operational benefit will be more flexibility in scheduling maintenance with reduced concern about the potential impact on system reliability and generation dispatch.

4. As this project advances to the Solutions stage, the alternatives considered, including equipment replacement, operational measures, maintenance practices,

and other lower-cost options before more extensive transmission facilities are proposed.

FirstEnergy will provide the information as required by Attachment M-3.

5. Estimated customer benefits and expected project costs once potential solutions are identified.

FirstEnergy will provide the information as required by Attachment M-3.

OCC appreciates that ATSI identified the specific operational issue prompting the project and encourages continued transparency as engineering alternatives are developed.