

FirstEnergy ATSI – Need No. ATSI-2026-058

OCC appreciates FirstEnergy's presentation of Need No. ATSI-2026-058. 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.

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

- The applicable planning criteria supporting the identified need.
 - There is not a planning criteria supporting the need. The need is FirstEnergy's duty to serve.
- The underlying load forecast assumption supporting the need;
 - Initial customer Load (2030): 50 MVA
 - Expected customer Load (2031): 200 MVA
 - Ultimate customer Load (2031) 200 MVA
- Whether the requesting customer has executed a binding service agreement or achieved other significant development milestones;
 - Yes, the customer has signed an agreement.
- 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.
- Estimated customer benefits and expected project costs once potential solutions are identified.
 - FirstEnergy will provide the information as required by Attachment M-3.

FirstEnergy ATSI – Need No. ATSI-2026-048

At the Needs and Solutions meeting held last month, OCC submitted several questions regarding the Needs presentation for this project. To date, those questions have not been addressed.

OCC respectfully requests that FirstEnergy provide written responses to the outstanding questions before these projects proceed further in the planning process. The questions concern matters central to evaluating the proposed projects, including the basis for the identified need, underlying load forecast assumptions, customer commitments, consideration of alternatives, project scope, timing, and expected consumer cost impacts.

As it pertains to the Solutions stage of the project, OCC requests the following additional information:

1. What engineering analysis demonstrates that the proposed solution is the least-cost and most effective option to address the identified breaker outage limitation on the Chamberlain-Harding 345-kV-line?
 - No engineering analysis was performed, nor was it necessary. With one breaker out of service, the only breaker remaining in service limits the capacity of the transmission line.
2. What alternatives were evaluated—including equipment replacement, operational changes, maintenance scheduling, or other lower cost options—and why were those alternatives rejected?
 - Maintain equipment in existing condition with potential operational constraints under maintenance and contingency scenarios.
3. Please quantify the reliability benefit of the proposed solution. Specifically, how often has this limitation occurred, what contingency or planning criteria are being assessed, and how will the project improve system performance?
 - 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.
4. Will FirstEnergy commit to providing the supporting studies, cost estimates, and responses to OCC's information requests before PJM selects a preferred solution, so stakeholders have a meaningful opportunity to evaluate the project?
 - FirstEnergy will provide the information as required by Attachment M-3.

ATSI 2237.2 Scope Change

1. The underlying load forecast assumption supporting the need
 - Reference the need presentation from the 11/22/2019 SRRTEP – Western Meeting.
 - <https://www.pjm.com/-/media/DotCom/committees-groups/committees/srrtep-w/20191122/20191122-atsi-supplemental.pdf>
2. Whether the requesting customer has executed a binding service agreement or achieved other significant development milestones;
 - Yes, the customer has signed a service agreement.
3. What specifically has changed in the scope of this project and what circumstances prompted the change since the project was originally presented and approved?
 - Nothing has changed in the scope of the project. This project was represented to show a model change as indicated on the slide and discussed in the TEAC meeting.
4. How does the revised scope affect the project's schedule, and expected in-service date, and what is the incremental cost attributable solely to the scope change?
 - The projected in-service date change is unrelated to the modeling change. There is no change in the project cost.
5. Has ATSI evaluated lower-cost or less extensive alternatives to the revised scope, and if so, what alternatives were considered and why were they rejected?
 - There is no revised scope.
6. Does the revised scope change the project's expected reliability or operational benefits, and can ATSI quantify the additional benefits that justify the expanded scope?
 - There is no revised scope.
7. What impact will the scope change have on consumers, including cost recovery and rate impacts, and will ATSI provide the engineering analyses and cost estimates supporting the revised scope as part of the TEAC record?

- There is no revised scope.