

**NextEra Energy Transmission MidAtlantic, Inc.**

**2024 Annual True-Up**

**Response to Questions received on August 19, 2025 from Theresa Ghiorzi**

**Question 3-additonal follow-up:**

- NextERA won a competitive bid for the MARL project - lets call this amount \$A
- When the project was awarded PJM split out a portion of the project and awarded it to First Energy, presumably PJM removed the costs for the segments NextERA was no longer building from the bid and added some amount to FirstEnergy - lets call NextERA's new reduced bucket of money \$B
- When PJM approved the Alternate MARL Route an amount of work for an approximately 25 mile greenfield segment was removed from NextERA the \$B amount should have been decremented by a sum equal to the work NextERA will no longer be performing as a result of FirstEnergy now building that segment.

I want to know :

- a) the amount \$B - the capped NextERA cost prior to the Alt MARL Route approval,
- b) the amount \$B that was removed for the greenfield segment no longer being built by NextERA, and
- c) \$C the amount NextERA's portion of the project is currently capped at.
- d) Is NextERA still building a segment in Loudoun?
- e) What Construction process is occurring on the Loudoun County segment?

**Response:**

- a) NEET's Project Cost Cap, as that term is defined in the Designated Entity Agreement, was \$512.62 million in 2023 dollars prior to the re-scope that removed the Loudoun County segment.
- b) The portion of the Project Cost Cap associated with baseline project b3800.119 (the segment in Loudoun County that was proposed to run from the Woodside substation to the Aspen substation and was later removed from NEET's scope of work) was \$71.72 million in 2023 dollars.
- c) NEET's current Project Cost Cap, as that term is defined in the Designated Entity Agreement, is \$440.95 million in 2023 dollars, subject to the cost containment provisions noted in Schedule E of the Designated Entity Agreement. The Project Cost Cap is not an estimate of total project costs.
- d) No, NEET is not building a segment in Loudoun County.
- e) Not applicable to NEET. No construction planned in Loudoun County by NEET.

**Question 4-additional follow-up:**

I want to see the detailed expenditures ie. the individual invoices by Vendor (or Vendor number if you want to mask the actual Vendor names) not cost summaries by Vendor by cost type.

Per Your Protocols Section III., A, 2, 4 and 5 cited below:

"Section III., A. Interested Parties shall have one hundred and eighty (180) days following Publication Date (unless such period is extended with the written consent of the NEET PJM Entities or by FERC order) to serve reasonable information and document requests on a NEET PJM Entity ("Information Exchange Period"). If the due date for information and document requests falls on a weekend or a holiday recognized by FERC, the deadline for submitting all information and document requests shall be extended to the next business day. Such information and document requests shall be limited to what is necessary to determine:

2. whether the Annual True-Up or projected net revenue requirement fails to include data properly recorded in accordance with these protocols;
4. the accuracy of data and consistency with the formula rate of the calculations shown in the Annual True-Up or projected net revenue requirement;
5. the prudence of actual costs and expenditures, including procurement methods and cost control methodologies;"

I am entitled to that data so that I can determine whether the true up includes properly recorded data, whether the data is accurate, and whether the expenses are prudent.

- a. Please provide the NDA Agreements for each of the Vendors 1 through Vendor 32 which NextERA cited as prohibiting NextERA from providing details on expenditures (ie. that invoices and detail information on invoices cannot be disclosed) and by vendor (See 2025 7/7 Q3 Response: "Due to confidentiality requirements in NEET MidAtlantic's agreements with its vendors, NEET MidAtlantic is unable to provide details on expenditures by vendor").
- b. I would like the list of expenditures (invoices) in the CWIP account (107) information by quarter for 2024, including vendor (or Vendor number), date, amount, and brief description of the item
- c. In the response to Question 4. It appears that NextERA is including Allowance of Funds Used During Construction (AFUDC) under "other" , Please break the amount of AFUDC under "other" into its own line item and provide a rationale for why these components of account 107 are earning AFUDC as well as CWIP.

**Response:**

- a. & b. NEET MidAtlantic is able to provide the attached detailed list of expenditures, organized by quarter for 2024 and by vendor number, along with brief descriptions in response to question (b) - thereby rendering the issue of NDAs raised in question (a) moot.

The attached details the \$9.1 MM of Outside Services and Environmental Services expenditures previously provided by NEET MidAtlantic on July 7, 2025, in the original response to question 4 (the “July 7 Response”). Employee Payroll, Benefits and Other Expenses of approximately \$4.1 MM, plus Land Rights of \$2.4 MM and Other expenditures (Weather and communication equipment, site tools, software and hardware services, PJM certification and AFUDC) totaling approximately \$55K make up the total ~ \$15.6 MM are also provided in the July 7 Response.

Note: The data previously listed under Vendor 22 in the July 7 response has now been consolidated with Vendor 7. It was mistakenly presented as a separate entry in the earlier version.

- c. AFUDC is included in the company’s FERC Form 1 CWIP balance in the amount of \$3,303. AFUDC was accrued on the MARL project in January 2024 prior to applying CWIP incentive beginning February 2024.