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April 25, 2019

VIA ELECTRONIC FILING

Honorable Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, DC 20428

Re: *AMP Transmission, LLC*, FERC Docket No.ER19-263-002  
Compliance Filing Under March 26, 2019 Order

Dear Secretary Bose:

On March 26, 2019, the Commission issued an order accepting subject to conditions the proposed revisions to the PJM Interconnection L.L.C. (“PJM”) Open Access Transmission Tariff (“OATT”) filed jointly by PJM and AMP Transmission, LLC (“AMPT”) on November 1, 2018.<sup>1</sup> Those revisions included a proposed formula rate template (“Template”) and implementation protocols (“Protocols”) designed to recover AMPT’s transmission revenue requirements for integrated transmission facilities it owns or leases in the PJM region. The March 26 Order permitted the AMPT Template and Protocols to become effective on January 1, 2019 subject to the submission of a compliance filing (as described below). In compliance with the March 26 Order, AMPT hereby submits this compliance filing containing revised eTariff records that are intended to satisfy the directives set forth in that order.<sup>2</sup>

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<sup>1</sup> Order on Transmission Formula Rate Proposal, *PJM Interconnection, L.L.C. and AMP Transmission, LLC*, 166 FERC ¶ 61,216 (2019) (“March 26 Order”). The formula rate template included in the November 1, 2018 filing was modified by AMPT’s January 25, 2019 response to the Commission’s December 26, 2018 deficiency letter and accepted by the Commission’s March 26 Order.

<sup>2</sup> Pursuant to Order No. 714, this filing is being submitted by PJM Interconnection, L.L.C. (“PJM”) on behalf of AMPT as part of an XML filing package that conforms with the Commission’s regulations. PJM has agreed to make all filings on behalf of the PJM Transmission Owners in order to retain administrative control over the PJM OATT. Thus, AMPT has requested that PJM submit this filing (including proposed Attachments H-32, H-32A, H-32B and H-32C to the PJM OATT) in the eTariff system as part of PJM’s electronic Intra PJM OATT.

### **I. Compliance Directives**

The compliance directives of the March 26 Order are spelled out in paragraphs 23 and 33 of the order. Specifically, regarding the AMPT Template, paragraph 23 of the March 26 Order states as follows:

23. Regarding the issue whether AMP Transmission's Template could be used in all PJM transmission zones, we find that it does not appear, in all instances, to allow for use in a PJM transmission zone using a non-calendar based rate year.<sup>36/</sup> This appears to be inconsistent with its stated intent of providing AMP Transmission the flexibility to use the Template for different rate years. In addition, the work papers included in the Template list the months in the order of a calendar year. Therefore, *we accept AMP Transmission proposal subject [to] a compliance filing to revise its proposed Template to allow it to be used by AMP Transmission in PJM transmission zones that require different rate years, consistent with its stated intent.* [Emphasis added]

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<sup>36/</sup> For example, the header of the proposed Template states that the information contained therein is "Year Ended 12/31/\_\_\_\_."

The Commission addressed a similar concern but with regard to AMPT's proposed Protocols in paragraph 33 of the March 26 Order:

33. AMP Transmission's proposed Protocols are applicable only to PJM transmission zones whose rate year is based on a calendar year, as they explicitly state that they are based on a calendar year. However, we find that approval of a Template that provides for the recovery of a revenue requirement in a PJM transmission zone with a non-calendar based rate year without corresponding protocols would result in a rate being on file without safeguards that the Commission has required to be in place, in this case protocols, to ensure that the input data is correct and accurate, that calculations are performed consistently with the formula rate, that the costs to be recovered in the formula rate are reasonable and were prudently incurred, and that the rates are just and reasonable.<sup>1</sup> We further find that AMP Transmission has provided no rationale for why it cannot provide, at this juncture, Protocols that would apply to PJM transmission zones with non-calendar year based rate years, consistent with its request that the Commission approve its Template for use PJM transmission zones with both calendar and non-calendar year based rate years. Therefore, *we direct AMP Transmission to submit, within 30 days of the issuance of this order, a compliance filing to either revise its proposed Protocols to allow it to be used by AMP Transmission in PJM transmission zones that require different rate years, consistent with its Template or propose separate Protocols to be used by AMP Transmission in PJM transmission zones with a non-calendar year based rate year.* [Emphasis added and footnotes omitted.]

AMPT believes that, all things considered, it will be clearer to customers if two separate sets of protocols are posted: one set that would apply in the more common circumstance of zones in which calendar-year billing is used, and a second set that would apply in the less common circumstance of a zone in which billing is on a non-calendar year basis. While the applicable protocols processes are substantively the same in the two situations, addressing both calendar-year billing and non-calendar year billing in a single set of protocols has the potential to be confusing. For that reason, AMPT elected the second of the two options offered by the March 26 Order—separate protocols for zones that use calendar-year and non-calendar year billing. Accordingly, pursuant the Commission's March 26, 2019 Order, AMPT has developed a separate set of protocols for use in transmission zones with non-calendar

year based rate years while retaining the previously filed protocols for zones that use calendar-year billing.

## **II. Description of Compliance Filing**

Through this submittal, AMPT seeks to place on file revised eTariff records that satisfy the directives of the March 26 Order, as set forth above.

In a nutshell, the Commission seeks to have AMPT place on file a formula rate template and formula rate protocols that will properly operate in any PJM transmission zone, regardless of whether the existing transmission owner(s) in the zone recover their revenue requirements through calendar year billing or through billing over a different twelve-month period (the latter being referred to in the March 26 Order as “a non-calendar based rate year”). In the course of developing revised tariff sheets to comply with the Commission’s directives, AMPT realized the necessity of making explicit a distinction between what we refer to below as the “Financial Year” and the “Rate Year.” More specifically:

- J The “**Financial Year**” is the twelve-month period for which AMPT’s projected and actual transmission revenue requirements will be determined each year. Because the AMPT revenue requirement is ultimately determined using values reported by AMPT in the format of the FERC Form 1, AMPT’s Financial Year necessarily will always be a calendar year.
- J The “**Rate Year**” is the twelve-month period during which AMPT’s projected annual transmission revenue requirement will be recovered (subject to later true-up) through charges to customers. The Rate Year may or may not be a calendar year. Regardless of whether the Rate Year begins on January 1 or the first of some other month, the charges collected during that Rate Year will be set at a level that is intended to recover AMPT’s revenue requirement as calculated on a calendar-year basis for the applicable Financial Year.

In the template and protocols previously submitted by AMPT, it was not necessary to draw an explicit distinction between the Financial Year and the Rate Year since both corresponded to a calendar year (as proposed by AMPT). In order to ensure that its filed template and protocols satisfy the Commission’s compliance directives, however, it is necessary to reflect this distinction through limited changes to the template and by creating a new set of non-calendar year protocols, as further explained below.

### ***A. Modifications to the Template***

The March 26 Order (at P 23) directed AMPT to “revise its proposed Template to allow it to be used by [AMPT] in PJM transmission zones that require different [*i.e.*, non-calendar] rate years.” As indicated above, AMPT’s annual transmission revenue requirement will be calculated for each “Financial Year,” and the Financial Year will, in all instances, be a calendar year. Consistent with that approach, and given that AMPT’s annual revenue requirement will be calculated on a calendar year basis regardless of whether the revenue requirement is collected through charges assessed over a calendar year or some other twelve-month period, those Template schedules that pertain to the calculation of AMPT’s annual transmission revenue requirement over a given calendar year are correct as currently filed. This is true for the majority of the Template schedules.

There is one template schedule, however, that requires modification to accord with a non-calendar Rate Year: Workpaper WP05, which sets forth the calculation of interest on differences between revenues collected from customers based on the Projected Transmission Revenue Requirement (PTRR) and the Actual Transmission Revenue Requirement (ATTR) for the applicable period. The as-filed version of WP05 is structured based on the assumption that the revenue requirement is collected through charges that are assessed and collected on a calendar-year basis, and the interest calculation shown in the as-filed workpaper incorporates that assumption. Rather than submitting on compliance two versions of the entire Template—one for a calendar-year Rate Year and one for a non-calendar year Rate Year<sup>3</sup>—AMPT proposes to (i) redesignate the as-filed version of WP05 as “WP05-A,” (ii) specify in the heading for the workpaper that WP05-A applies when charges in the relevant zone are assessed based on a calendar year billing cycle, and (iii) add a new workpaper, labeled WP05-B, that correctly calculates interest on any True-Up Adjustment for zones in which charges are assessed based on a non-calendar year billing cycle. These changes are reflected in the revised Template tariff sheets included in Attachment 1 to this compliance filing.

***B. Modifications to the Protocols***

***1. Basic Approach: A Separate Set of Protocols for Non-Calendar Year Zones***

In the March 26 Order, the Commission made clear its view that, in light of AMPT’s stated intent to own or lease facilities in more than one PJM transmission zone, customers should have advance notice of the protocols that would govern across a range of possible billing cycles, including in zones that do not bill on a calendar year basis. The March 26 Order (at P 33) therefore directed AMPT to file now, rather than at a later date when necessary, protocols that would apply in differing billing cycles.<sup>4</sup> The order, however, afforded AMPT a choice in how it would comply with the directive that it place on file a set of Protocols suitable for use in zones that use a non-calendar year billing cycle: AMPT could either “revise its proposed Protocols to allow it to be used by [AMPT] in PJM transmission zones that require different rate years, consistent with its Template[,] or propose separate Protocols to be used by [AMPT] in PJM transmission zones with a non-calendar year based rate year.”

Following careful consideration, AMPT has concluded that the second option offered by the Commission is the course that will provide the greatest clarity to customers. The Protocols included in AMPT’s November 1, 2018 filing are structured on the premise that the Rate Year—the time period over which the PTRR is recovered through charges to customers (subject to later true-up)—is, like the revenue requirement itself, based on a 12-month period coincident with the calendar year. AMPT prepared its Protocols on that premise because the PJM transmission zones in which AMPT currently foresees the likelihood of owning or leasing transmission facilities all utilize calendar-year billing. In the context of calendar-year billing, it is unnecessary to explicitly distinguish between the “Financial Year” and the “Rate Year” since there is no asynchrony between the two. Accordingly, the AMPT Protocols included in the November 1, 2018 filing, which conform to the Commission’s determinations

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<sup>3</sup> In point of fact, the option of submitting two versions of the Template was not offered in the March 26 Order. In contrast to the two-version optionality offered with respect to the Protocols, the March 26 Order was clear (at P 23) that AMPT was to retain the as-filed version of the Template but modify it as necessary.

<sup>4</sup> In doing so, the Commission rejected AMPT’s proposal to develop and file appropriately modified protocols, suitable for use in non-calendar year zones, in advance of placing its formula rate Template into effect in any such zone. See November 1, 2018 filing, Transmittal Letter at n. 29.

in the MISO protocols dockets<sup>5</sup> and other protocols-focused rulings,<sup>6</sup> are well-suited for use, without modification, in the transmission zones in which they are most likely to be applied.

A different and more complex situation is presented, however, by a zone in which the revenue requirement is determined based on a calendar year but that revenue requirement is recovered through charges assessed over the course of a non-calendar year twelve-month period. AMPT has determined that, for protocols that would apply in such circumstances, it is necessary to expressly distinguish between the “Financial Year” and the “Rate Year,” as those terms are defined above. For example, provisions of the protocols that address development of the projected and actual transmission revenue requirements will speak primarily in terms of the applicable “Financial Year,” while provisions that address the posting of the Annual Projection, deadlines for customer inquiries and responses, initiation of preliminary and formal challenges and similar matters will be tied to the beginning and end of the “Rate Year.” A narrative example of the application of the “Financial Year” and “Rate Year” is set forth in Attachment 4 to this filing.

Set forth in Attachment 1 to this filing is a revised version of the Protocols included in AMPT’s November 1, 2018 filing. The only revisions to these Protocols are (i) to redesignate the Protocols from Attachment H-32B to Attachment H-32B-1 of the PJM Tariff, and (ii) to change the title of the attachment to specify its applicability only in “Calendar Year Basis” zones.

## 2. Protocols Process in Non-Calendar Year Zones

This compliance submittal includes a new set of AMPT Protocols titled “Annual True-Up, Information Exchange, and Challenge Procedures (Non-Calendar Year Basis).” If accepted for filing, these new protocols would be designated Attachment H-32B-2 of the PJM OATT. To demonstrate the operation of these new Protocols, AMPT provides the following summary of the billing and true-up process that the new Protocols would establish for a non-calendar year zone.

- J On a date no later than 60 days before the start of a new Rate Year (“Rate Year n”), AMPT would post the projected transmission revenue requirement to be recovered through charges assessed during Rate Year n. The Financial Year for which the transmission revenue requirement would be projected (“Financial Year n”) is the calendar year in which the projection is posted.
- J On a date no later than 60 days before the start of Rate Year n+2, AMPT would post the projected transmission revenue requirement to be recovered through charges assessed during Rate Year n+2. At that point in time, AMPT will have its actual financial results (and, so, its ATRR) for Financial Year n; it also will have information about the amount of revenue it actually collected through rates during Rate Year n. By comparing its ATRR for Financial Year n with the amount of revenue collected during Rate Year n, AMPT will be able to calculate a True-Up Adjustment for Rate Year n. The True-Up Adjustment for Rate Year n will be taken into account (as a credit or additional charge) in determining the PTRR posted for Rate Year n+2.

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<sup>5</sup> *Midwest Indep. Trans. Sys. Operator, Inc.*, 139 FERC ¶ 61,127 (2012), *order on investigation*, 143 FERC ¶ 61,149 (2013), *order on reh’g*, 146 FERC ¶ 61,209, *order on compliance filing*, 146 FERC ¶ 61,212 (2014).

<sup>6</sup> *E.g., The Empire Dist. Elec. Co.*, 150 FERC ¶ 61,200 (2015).

- J Interest on the True-Up Adjustment for Rate Year n will be calculated from the midpoint of Rate Year n to the first day of each month in Rate Year n+2. The amount of that interest also will be included in the True-Up Adjustment that will be credited or charged during Rate Year n+2.
- J Collectively, the posting made by AMPT at least 60 days prior to the start of Rate Year n+2 would incorporate (i) a projection of AMPT's transmission revenue requirement for Financial Year n+2, (ii) a True-Up Adjustment based on the difference between revenues collected during Rate Year n and AMPT's actual revenue requirement for Financial Year n, and (iii) interest on the True-Up Adjustment.<sup>7</sup>
- J With respect to any Annual Update posting, customer rights to request information and to assert preliminary and formal challenges would encompass all elements of the Annual Update, including the calculation of the ATRR for the Financial Year two years prior and the True-Up Adjustment for the Rate Year two years prior.

The Protocols set forth as new Attachment H-32B-2 to the PJM OATT thus satisfy the Commission's directive that AMPT place on file a set of protocols that would establish just and reasonable procedures in a transmission zone in which billing is performed on other than a calendar-year basis. The non-calendar year zone Protocols are included in Attachment 1.

### **III. Documents Included in this Submittal**

The following documents are included in this compliance filing:

Attachment 1: Attachment H-32A to the PJM OATT (AMPT Formula Rate Template) and Attachment H-32B to the PJM OATT (AMPT Formula Rate Implementation Protocols) (Marked). The changes to the formula rate template are not substantive and are limited to the following: (i) removal of references to calendar months and specific years, per the specific directives in the March 26 Order; (ii) addition of language in the footnote to workpaper WP01 clarifying that projected and trued-up revenue requirements will be on a calendar (financial) year basis; and (iii) the addition of workpaper WP05-B, which is the calculation of interest on differences between revenues collected based on the PTRR and the ATRR for non-calendar year zones. The changes to the formula rate implementation protocols include the following: (i) adding "-1" to the title of the protocols for Calendar Year zones (Attachment H-32B-1) and (ii) adding the protocols for Non-Calendar Year zones (Attachment H-32B-2).

Attachment 2: Attachment H-32A to the PJM OATT (AMPT Formula Rate Template) and Attachment H-32B to the PJM OATT (AMPT Formula Rate Implementation Protocols) (Clean).

Attachment 3: Workable Excel version of Revised Attachment H-32A to the PJM OATT.

Attachment 4: Narrative Example of the application of "Financial Year" and "Rate Year."

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<sup>7</sup> Thus, the posting AMPT would make at least 60 days before the start of a Rate Year would combine in a single posting elements of both the Annual Update and the Annual Projection under the as-filed Protocols. For that reason, in the new protocols, that combined posting is referred to as simply the "Annual Update," and references to the "Annual Projection" are eliminated where superfluous.

#### **IV. Service**

PJM has served a copy of this filing on all PJM Members and on all state utility regulatory commissions in the PJM Region by posting this filing electronically. In accordance with the Commission's regulations,<sup>8</sup> PJM will post a copy of this filing to the FERC filings section of its internet site, located at the following link: <http://www.pjm.com/documents/ferc-manuals/ferc-filings.aspx> with a specific link to the newly-filed document, and will send an e-mail on the same date as this filing to all PJM Members and all state utility regulatory commissions in the PJM Region<sup>9</sup> alerting them that this filing has been made by PJM and is available by following such link. If the document is not immediately available by using the referenced link, the document will be available through the referenced link within 24 hours of the filing. Also, a copy of this filing will be available on the Commission's eLibrary website located at the following link: <http://www.ferc.gov/docs-filing/elibrary.asp> in accordance with the Commission's regulations and Order No. 714.

In addition, AMPT has served a copy of this compliance filing on all parties to Docket No. ER19-263-000, as certified in the attached Certificate of Service.

#### **V. Conclusion**

The revised PJM OATT sections included in this submittal satisfy the compliance directives contained in the March 26 Order. Accordingly, the Commission should accept the revised tariff sheets included in this filing and permit them to become effective as of January 1, 2019 in accordance with the March 26 Order.

Very truly yours,

**AMP TRANSMISSION, LLC**

By: /s/ Gary J. Newell

Gary J. Newell

Attorney for AMP Transmission, LLC

Attachments

cc: All parties (ER19-263-000)

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<sup>8</sup> See 18 C.F.R §§ 35.2(e) and 385.2010(f)(3).

<sup>9</sup> PJM already maintains, updates and regularly uses e-mail lists for all PJM members and affected state commissions.

## CERTIFICATE OF SERVICE

I hereby certify that I have on this date caused a copy of the foregoing document and its attachments to be served on all parties to FERC Docket No. ER19-263-000, by electronic mail or such other means as a party may have requested, in accordance with Commission Rule 2010, 18 C.F.R. §385.2010 (2018).

Dated this the 25<sup>th</sup> day of April, 2019.

/s/ Errin C. Harris

Errin C. Harris



# **ATTACHMENT 1**

**Attachment H-32A to the PJM OATT (AMPT  
Formula Rate Template)**

**and**

**Attachment H-32B to the PJM OATT (AMPT  
Formula Rate Implementation Protocols)  
(Marked)**

**Attachment H-32A to the PJM OATT  
(AMPT Formula Rate Template)  
(Marked)**

AMP Transmission LLC

Calculation of Transmission Revenue Requirements

Transmission Zone

Cash-Flow Model

Year Ended ~~12XX/31XX/20~~

Projected or Actual

Line No.	Cost of Service Item	(Note A) Page, Line, Col.	Notes	Company Total	Allocator	Qualifying Transmission
(a)	(b)	(c)	(d)	(e)	(f)	(g) (e) x (f) Allocated Amount
1	GROSS REVENUE REQUIREMENT (line 54)					\$ -
2						
3						
4	REVENUE CREDITS	(Note C)		Total	Allocator	
5	Account No. 454	WP02		\$ -	TP 0.000%	\$ -
6	Account No. 456	WP02		\$ -	TP 0.000%	\$ -
7	Revenue Credits Specific to zone	WP02		\$ -	D/A 100.00%	\$ -
8	Reserved			\$ -	TP 0.000%	\$ -
9	Transmission Enhancement Credit	WP07		\$ -	TP 0.000%	\$ -
10	TOTAL REVENUE CREDITS (sum lines 5-9)					\$ -
11						
12	TRUE-UP ADJUSTMENT WITH INTEREST (Protocols)	(Note D) WP05				\$ -
13						
14	Adjustments to Net Revenue Requirement (Note G)					\$ -
15	Interest on Adjustments (Note H)					\$ -
16	Total Adjustment (line 14 + line 15)					\$ -
17	NET REVENUE REQUIREMENTS					\$ -
17a	DIVISOR					
17b	1 Coincident Peak (CP) (MW) - Enter Zone Name					- MW
17c	Annual Network Rate (\$/MW/Yr) (Line 17 / Line 17b)					- MW/Yr
18						
19	O&M/A&G, DEBT SERVICE & OTHER TAXES					
20						
21	Transmission O&M allocable to zone	321.112.b and WP09	WP09	\$ -	TP 0.000%	\$ -
22	Transmission O&M Specific to zone (Note M)	Zone in title	WP09	\$ -	D/A 100.000	\$ -
23	Less Account 565	321.96.b	Form 1	\$ -	TP 0.000%	\$ -
24	Less: Account 561.2 Load Dispatch - Monitor and Operate Trans System through Schedule 1A	321.86.b	Form 1	\$ -	TP 0.000%	\$ -
25	A&G allocable to zone (Note M)	323.197.b and WP09	WP09	\$ -	W&S 100.000%	\$ -
26	A&G Specific to zone (Note M)		WP09	\$ -	W&S 100.000%	\$ -
27	Other Amortizations - ____ current Zone (Note N)		WP03	\$ -	D/A 100.000%	\$ -
28	Other Amortizations - ____ other Zone (Note N)		WP03	\$ -	N/A 0.000%	\$ -
29	Other Amortizations - All zones		WP03	\$ -	D/A 100.000%	\$ -
30	Amortization of Start-Up Costs to zone (Note N)		WP03	\$ -	D/A 100.000%	\$ -
31	TOTAL O&M (sum lines 21, 23, 25-28, less lines 23 and 24)					\$ -
32						
33	DEBT SERVICE					
34	Debt Service (Note L)		WP06	\$ -	TP 0.000%	\$ -
35	Amortization of premium or discount (Note E)			\$ -	TP 0.000%	\$ -
36	TOTAL DEBT SERVICE (Sum lines 34 and 35 )			\$ -		\$ -
37	Interest for Working Capital needs		WP06b	\$ -	TP 0.000%	\$ -
38						
39	TAXES OTHER THAN INCOME TAXES (Note F)					
40	LABOR RELATED					
41	Payroll	263.i	Form 1	\$ -	W&S 100.000%	\$ -
42	Highway and vehicle	263.i	Form 1	\$ -	W&S 100.000%	\$ -
43	PLANT RELATED	263.i				
44	Property specific to zone (Note M)	Reference zone	WP09	\$ -	D/A 100.000%	\$ -
45	Property allocable to zone (Note M)	263.i and WP09	WP09	\$ -	TP 0.000%	\$ -
46	Other	263.i	Form 1	\$ -	D/A 100.000%	\$ -
47	State Franchise Tax	263.i	Form 1	\$ -	D/A 100.000%	\$ -
48	TOTAL OTHER TAXES (sum lines 41 through 47)			\$ -		\$ -
49						
50	Subtotal (lines 31 + 36 + 37 + 48)			\$ -		\$ -
51		Margin factor				
52	MARGIN REQUIREMENT (Note I)(WP10)	40% of Debt Service	40.0%	\$ -	D/A 100.000%	\$ -
53						
54	REV. REQUIREMENT (sum lines 50 and 52)			\$ -		\$ -
55						
56	GROSS PLANT IN SERVICE					
57	Production			\$ -	NA	
58	Transmission (Note B)	207.58.g	WP01/04	\$ -	D/A 100.000%	\$ -
59	Distribution			\$ -	N/A 0.000%	\$ -
60	General & Intangible	205.5.g & 207.99.g	WP01	\$ -	W&S 100.000%	\$ -
61	Reserved			\$ -	TP 0.000%	\$ -
62	Other			\$ -	TP 0.000%	\$ -
63	TOTAL GROSS PLANT (sum lines 57 - 62)			\$ -		\$ -
64						\$ -
65	TRANSMISSION PLANT % INCLUDED IN PJM COST OF SERVICE					\$ -
66						\$ -
67	Total transmission plant		WP04			\$ -
68	Less Non-Qualifying Transmission Plant		WP04			\$ -
69	Less transmission plant included in OATT Ancillary Services		WP04			\$ -
70	Total Qualifying Transmission Plant in Service (line 67 - 68 - 69)					\$ -
71						
72	Percentage of PJM Qualifying transmission plant included in Cost of Service (line 70 / line 67)				TP=	0.000%

AMP Transmission LLC  
Calculation of Transmission Revenue Requirements  
Transmission Zone  
Cash-Flow Model  
Year Ended ~~12XX/31XX/20~~  
Projected or Actual

Line No.	Cost of Service Item	(Note A) Page, Line, Col.	Notes	Company Total	Allocator	Qualifying Transmission
(a)	(b)	(c)	(d)	(e)	(f)	(g) (e) x (f) Allocated Amount
73	TRANSMISSION EXPENSES					
74						
75						
76	Total transmission expenses (line 21+22 Column e)					\$ -
77	Less transmission expenses included in OATT Ancillary Services (Note J)					\$ -
78	Included transmission expenses (line 76 less line 77)					\$ -
79						
80	Percentage of transmission expenses after adjustment (line 78 divided by line 76)					0.000%
81	Percentage of transmission plant included in ISO Rates (line 72)				TP	0.000%
82	Percentage of transmission expenses included in ISO Rates (line 80 times line 81)				TE=	0.000%
83						
84						
85	WAGES & SALARY ALLOCATOR (W&S) (Note K)			\$	TP Allocation	
86	Production			\$ -	0.000%	\$ -
87	Transmission (WP04)			\$ 1	100.000%	\$ 1
88	Distribution			\$ -	0.000%	\$ -
89	Other			\$ -	0.000%	\$ -
90	Total (sum lines 86-89)			\$ 1	\$ 1	= 100.000% =WS
91						
92						
93						
94						
95						
96						
97						
98						
99	General Note:		References to pages in this formulary rate are indicated as: (page#, line#, col.#)			
100			References to data from Informational FERC Form 1 are indicated as: #.y.x (page, line, column)			
101						
102	Notes:					
103	A		AMPT will maintain and post with informational filings an Informational FERC Form 1.			
104	B		Beginning/End year balances will match Form 1. 13-Month average balances shown on WP-01. Qualifying zonal transmission investment shown on WP04. Excluding any Transmission AROs			
105	C		The revenues credited on page 1 lines 5-9 shall include only the amounts received directly (in the case of grandfathered agreements) or from the ISO (for service under this tariff) reflecting the Transmission Owner's integrated transmission facilities. They do not include revenues associated with FERC annual charges, gross receipts taxes, ancillary services, facilities not included in this template (e.g., direct assignment facilities and GSUs) which are not recovered under this Rate Formula Template.			
106						
107						
108						
109	D		The True-Up adjustment is the difference between (1) the revenues received for the twelve month period and (2) the ATRR for that twelve month period after it is known, with interest			
110			Over Recoveries are entered as negative to reduce the net revenue. Under recoveries are entered as Positive to increase the net revenue.			
111	E		Includes amounts recorded to accounts 428 and 429.			
112	F		Includes only FICA, unemployment, highway, property, gross receipts, PILOT, and other assessments charged in the current year. Taxes related to income are excluded.			
113			Gross receipts taxes are not included in transmission revenue requirement in the Rate Formula Template, since they are recovered elsewhere.			
114	G		Adjustments required pursuant to Section 6 of the AMPT Protocols. Refunds shall be entered as a negative number to reduce the net revenue requirement.			
115			Surcharges shall be entered as a positive number to increase the net revenue requirement.			
116	H		Interest required pursuant to Section 2(c) of Protocols. Interest on any refunds shall be entered as a negative number to reduce the net revenue requirement. Interest on surcharge shall be entered as a positive number to increase the net revenue requirement.			
117						
118	I		Margin Factor equals .40 or 40% of debt service. Margin Requirement is the dollar amount that results from applying the Margin Factor to annual debt service.			
119			The Margin Factor can only be changed by Order of the Commission			
120	J		Removes dollar amount of transmission expenses included in the OATT ancillary services rates, including all of Account No. 561.1, 561.2, 561.3 and 561.BA.			
121						
122	K		AMPT will have no wages and salaries. However, all A&G expense incurred by AMPT will be 100% related to AMPT Transmission			
123	L		PTRR debt service projections for zone are shown on WP06. Actual ATRR debt service (for True-up template) will be from AMPT accounting records			
124	M		If ASTI zone, entry is WP09, line Col (d) for O&M and A&G			
125			If AEP zone, entry is WP09, line Col (d) for O&M and A&G			
126	N		Includes amortization of pre-commercial Start-Up costs booked in account 182.3, approved by the Commission and amortized through Account 566.			

# AMP Transmission LLC

Page 3 of 18

## Gross Plant in Service - 13 Month Average Balances

Attachment H-32A - WP01 - Plant  
Projected

Line No.	Month	Year	Production	Transmission	Distribution	General	Intangible	Total
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
		[A]	205.46.g	207.58.g	207.75.g	207.99.g	205.5.g	

1	<del>December</del> Month 1	<del>2018</del> XX
2	<del>January</del> Month 2	<del>2019</del> XX
3	<del>February</del> Month 3	<del>2019</del> XX
4	<del>March</del> Month 4	<del>2019</del> XX
5	<del>April</del> Month 5	<del>2019</del> XX
6	<del>May</del> Month 6	<del>2019</del> XX
7	<del>June</del> Month 7	<del>2019</del> XX
8	<del>July</del> Month 8	<del>2019</del> XX
9	<del>August</del> Month 9	<del>2019</del> XX
10	<del>September</del> Month 10	<del>2019</del> XX
11	<del>October</del> Month 11	<del>2019</del> XX
12	<del>November</del> Month 12	<del>2019</del> XX
13	<del>December</del> Month 13	<del>2019</del> XX

14  
15 13-month

16

17

18 Asset Retirement Cost for Transmission Plant

19

Transmission

20

21

[A]

207.57.g

22	<del>December</del> Month 1	<del>2018</del> XX
23	<del>January</del> Month 2	<del>2019</del> XX
24	<del>February</del> Month 3	<del>2019</del> XX
25	<del>March</del> Month 4	<del>2019</del> XX
26	<del>April</del> Month 5	<del>2019</del> XX
27	<del>May</del> Month 6	<del>2019</del> XX
28	<del>June</del> Month 7	<del>2019</del> XX
29	<del>July</del> Month 8	<del>2019</del> XX
30	<del>August</del> Month 9	<del>2019</del> XX
31	<del>September</del> Month 10	<del>2019</del> XX
32	<del>October</del> Month 11	<del>2019</del> XX
33	<del>November</del> Month 12	<del>2019</del> XX
34	<del>December</del> Month 13	<del>2019</del> XX

35

36 13-month Average

37

38 Notes:

39

[A]

Reference for December balances as would be reported in FERC Form 1.

Whether used in a PJM transmission zone with a

calendar year or non-calendar year rate period, AMPT will always forecast and true-up to the calendar/financial year because the AMPT revenue requirement is ultimately determined using values reported by AMPT in the format of the FERC Form 1.

**AMP Transmission  
LLC**  
Revenue Credits Workpaper

Attachment H-32A - WP02 - Revenue  
Credits

Page 4 of 18

**H-32A-WP02 - Revenue Credits**

Add Lines if needed

Line			
No.	<u>REVENUE CREDITS</u>	<u>Amount</u>	<u>Description of Revenue Credits</u>
(a)	(b)		(c) (d)
<u>ADD LINES AS NEEDED FOR ADDITIONAL REVENUE CREDITS</u>			
1	Account No. 454	\$	-
2	Account No. 454 Revenue Credits specific to zone	\$	-
3	Account No. 454 Revenue Credits allocable to all zones	\$	-
4			
5			
6			
7	Account No. 456	\$	-
8	Account No. 456 Revenue Credits specific to zone	\$	-
9	Account No. 456 Revenue Credits allocable to all zones	\$	-
10			
11			
12	Other Revenue Credits specific to zone	\$	-
13			
14			
15			

# AMP Transmission LLC

Formation Cost (Start-up) Workpaper

Attachment H-32A - WP03 - Start-Up Costs

Page 5 of 18

Add Columns and lines as needed

## AMP Transmission LLC 2018 Start-Up Costs

**3-year Amorts**  
Deferred from  
and Incurred in  
2018

Up Front Costs

Legal :

Legal :

Legal :

Legal :

Legal:

Legal :

Total Legal

consultant

Travel, Meals

AMP Labor/Overhead

consultant

PJM Application fee

Legal

Legal

Legal

Total Up-Front Costs

Number of anticipated Transmission Zones

Amortization period

Yearly Amortization

Deferred to AEP Zone (or Next Zone)

\$

\$

\$

\$

\$

\$

\$

\$

\$

\$

\$

\$

\$

\$

\$

2 ATSI and AEP East

3 years beginning 1/1/2019

ATSI Zone

AEP zone for future request at FERC

### Other Amortizations of deferred start-up – ATSI Zone Specific

Total

Term

Yearly  
Amortization

Legal

1

Consulting

1

Consulting

1

PJM

1

Consulting

1

O&M Napoleon rest of 2018 estimate

1

Travel/Meals/Insurance

1

AMP Labor/Overhead

1

Fourth quarter 2018 interest on Napoleon Loan

1

legal

1

Legal

1

legal

1

Total 1-year Amort to ATSI zone

Add lines as needed

ADD LINES AND CATEGORIES AS NEEDED

**Other Amortizations - AEP**

Page 6 of 18

	<u>Total</u>	<u>term</u>	<u>Yearly Amortization</u>
List other AEP Amortizations here	\$ -	0	\$ -
List other AEP Amortizations here	\$ -	0	\$ -
List other AEP Amortizations here	\$ -	0	\$ -
List other AEP Amortizations here	\$ -	0	\$ -
List other AEP Amortizations here	\$ -	0	\$ -
List other AEP Amortizations here	\$ -	0	\$ -
List other AEP Amortizations here	\$ -	0	\$ -
Total AEP zonal Amortizations			\$ -

Add lines as needed

AMP Labor – Start-up amortization over 3 or 1 years.

**LABOR FOR SEPT\_DEC**

AMP Labor Hours	% Time	Hours	Expenses	
1		10%	52	3 months remaining
2		10%	52	
3		50%	260	
4		35%	182	
5		90%	468	
6		10%	52	
7		10%	52	
8		10%	52	
9		5%	26	
10		20%	104	
11		20%	104	
12		5%	26	
13		5%	26	
14		20%	104	
15		20%	104	
16		5%	26	Blended Rate

LABOR HOURS 1690 \$ 75.00

\$ -

LABOR EXPENSES 41%

\$

Labor Overhead

\$

\$ Budget for Oct - Dec 2018

\$ Actuals thru September

\$ Budget October - December based on AMP % allocation

\$ Total

But, 3 vs 1 year split is thru August!

So, \$ - /9\*8 = actual thru August \$

Half goes to 3 year, half to 1 \$

Remainder goes to ATSI; \$

ADD LINES AND CATEGORIES AS NEEDED



# AMP Transmission LLC

## Zonal Investment Workpaper

Page 7 of 18

Add Zones if necessary. Add lines for more project investment

Line  
No.**AMPT Transmission Investment - Gross Plant**

	(a)	(b)	(c)	(d)	(e)
		<u>ATS</u>	<u>AE</u>	<u>Other zone</u>	<u>AMPT Total</u>
City of Napoleon Assets	\$	\$	-	\$	-
Non-Qualifying	\$	-	\$	-	\$
Total Qualifying	\$	\$	-	-	\$
	\$				
Zonal Allocation		100%	0%	0%	
Allocated To Zone		\$	\$	-	\$

**Transmission Plant recovered in Ancillary Services**

	<u>ATSI</u>	<u>AEP</u>	<u>Other Zone</u>	<u>AMPT Total</u>
Amount	\$ -	\$ -	\$ -	\$ -
Zone Allocation	0%	0%	0%	
Allocated to Zone	\$ -	\$ -	\$ -	\$ -

**Wages and Salaries Proxy – Gross Plant in Each Zone**

Line 12 (a, b, or c) divided by Line 12(e) 100.0% 0.0% 0.0%

# AMP Transmission LLC

True-Up and Adjustments Workpaper

Page 8a of 18

## AMPT True-up with Interest - based on Protocols

NITS Revenues received by PJM for the Year (Note 2)	-	Actual Revenue Requirement For Year (ATRR)	-	=	True-up Adjustment - (Over)/Under Recovery	-
\$					\$	

Over (Under) Recovery Plus Interest	Average Monthly Interest Rate Amortization	Months	Calculated Interest	Surcharge (Refund) Owed
Interest Rate on Amount of Refunds or Surcharges (Note 1)	0.3542%			

As an example, an over or under collection will be recovered prorata over 2019, held for 2020 and returned prorata over 2021

Calculation of Interest				Monthly		
January	Year 2019	-	0.3542%	12	-	-
February	Year 2019	-	0.3542%	11	-	-
March	Year 2019	-	0.3542%	10	-	-
April	Year 2019	-	0.3542%	9	-	-
May	Year 2019	-	0.3542%	8	-	-
June	Year 2019	-	0.3542%	7	-	-
July	Year 2019	-	0.3542%	6	-	-
August	Year 2019	-	0.3542%	5	-	-
September	Year 2019	-	0.3542%	4	-	-
October	Year 2019	-	0.3542%	3	-	-
November	Year 2019	-	0.3542%	2	-	-
December	Year 2019	-	0.3542%	1	-	-
					-	-

				Annual		
January through December	Year 2020	-	0.3542%	12	-	-

Over (Under) Recovery Plus Interest Amortized and Recovered Over 12 Months				Monthly		
January	Year 2021	-	0.3542%	-	-	-
February	Year 2021	-	0.3542%	-	-	-
March	Year 2021	-	0.3542%	-	-	-
April	Year 2021	-	0.3542%	-	-	-
May	Year 2021	-	0.3542%	-	-	-
June	Year 2021	-	0.3542%	-	-	-
July	Year 2021	-	0.3542%	-	-	-
August	Year 2021	-	0.3542%	-	-	-
September	Year 2021	-	0.3542%	-	-	-
October	Year 2021	-	0.3542%	-	-	-
November	Year 2021	-	0.3542%	-	-	-
December	Year 2021	-	0.3542%	-	-	-
				-	-	-

True-Up with Interest	\$	-
Less Over (Under) Recovery	\$	-
Total Interest		
\$		

Note 1:  
Interest Rate on Amount of Refunds or Surcharges is the monthly average interest rate calculated in accordance with section 2(c) of the AMPT Formula Rate Protocols.

Note 2:  
Exclude any true-up amount included in the PTRR for the year being true-up

**AMP Transmission  
LLC**  
True-Up and Adjustments Worksheet

Attachment H-32A - WP05-B - True-Up and  
Adjustments

Page 8b of 18

**AMPT True-up with Interest – under Non-Calendar Year Protocols**

<div>NTTS Revenues received from PJM for the Rate Year (Note 2)</div>	<div>Actual Revenue Requirement For Financial Year (ATRR)</div>	<div>True-up Adjustment - (Over)/Under Recovery</div>
\$ -	-	= \$ -

<u>Over (Under) Recovery Plus Interest</u>	<u>Average Monthly Interest Rate Amortization</u>	<u>Months</u>	<u>Calculated Interest</u>	<u>Surcharge (Refund) Owed</u>
Interest Rate on Amount of Refunds or Surcharges (Note 1)	0.3542%			

As an example, an over or under collection will be recovered prorata over Rate Year "n", held for Rate Year "n+1" and returned prorata over Rate Year "n+2"

<u>Calculation of Interest</u>		<u>Monthly</u>	
Month 1	Rate Year "n"	- 0.3542%	-
Month 2	Rate Year "n"	- 0.3542%	-
Month 3	Rate Year "n"	- 0.3542%	-
Month 4	Rate Year "n"	- 0.3542%	-
Month 5	Rate Year "n"	- 0.3542%	-
Month 6	Rate Year "n"	- 0.3542%	-
Month 7	Rate Year "n"	- 0.3542%	-
Month 8	Rate Year "n"	- 0.3542%	-
Month 9	Rate Year "n"	- 0.3542%	-
Month 10	Rate Year "n"	- 0.3542%	-
Month 11	Rate Year "n"	- 0.3542%	-
Month 12	Rate Year "n"	- 0.3542%	-
		-	-

		<u>Annual</u>
Month 1 through Month 12	Rate Year "n+1"	- 0.3542% 12 =

<u>Over (Under) Recovery Plus Interest Amortized and Recovered Over 12 Months</u>		<u>Monthly</u>
Month 1	Rate Year "n+2"	- 0.3542%
Month 2	Rate Year "n+2"	- 0.3542%
Month 3	Rate Year "n+2"	- 0.3542%
Month 4	Rate Year "n+2"	- 0.3542%
Month 5	Rate Year "n+2"	- 0.3542%
Month 6	Rate Year "n+2"	- 0.3542%
Month 7	Rate Year "n+2"	- 0.3542%
Month 8	Rate Year "n+2"	- 0.3542%
Month 9	Rate Year "n+2"	- 0.3542%
Month 10	Rate Year "n+2"	- 0.3542%
Month 11	Rate Year "n+2"	- 0.3542%
Month 12	Rate Year "n+2"	- 0.3542%
		-

True-Up with Interest	\$ -
Less Over (Under) Recovery	\$ -

Total Interest \$ -

Note 1:  
Interest Rate on Amount of Refunds or Surcharges is the monthly average interest rate calculated in accordance with section 2(c) of the AMPT Formula Rate Protocols.  
Note 2:  
Exclude any true-up amount included in the PTRR for the year being true-up

AMP Transmission LLC

Debt Service Workpaper - Annual

Projections  
Page 9 of 18

Debt Service Payments - Year End ~~12XX/31XX/2019XX~~

Rate Year	Total Projected	Actual Debt Service
2019 <del>XX</del>	<del>\$151,085,790</del>	\$0

for PTRR - to line 34 of Attachment H-32A

For ATRR and True-up, AMPT will record actual P&I in the year and those P&I entries will be populated in H-32A, page 1, line 36  
Add Additional Project Columns as needed

AMPT Projects											
	Project #1	Project #2	Project #3	Project #4	Project #5	Project #6	Project #7	Project #8	Project #9	Project #10	Total Projected
Project Name:											
Loan Principal:											
Less Acquisition Premium	\$0										\$0
Net Loan Principal											
Loan Term											
(Years): Loan											
Start Date:											
Loan End Date:											
Annual Interest											
Rate: Projected Yearly Debt Service											
Debt Service Schedule (Yearly)											
Year											
2019	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2023	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2024	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2025	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2026	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2027	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2028	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2029	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2030	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2031	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2032	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2033	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2034	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2035	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2036	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2037	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2038	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

AMP Transmission LLC

Debt Service Workpaper - Annual

Debt Service Payments - Year End ~~12XX/31XX/2019XX~~

Add Additional "Other" Columns as needed

Other AMPT Capitalized Equipment											
	Project #1	Project #2	Project #3	Project #4	Project #5 #5	Project #6 #6	Project #7 #7	Project #8 #8	Project #9 #9	Project #10 #10	Total Projected
Project Name:											
Loan Principal:											
Less Acquisition Premium											\$0
Net Loan Principal											
Loan Term											
(Years): Loan											
Start Date:											
Loan End Date:											
Annual Interest											
Rate: Projected Yearly Debt Service											
<u>Debt Service Schedule (Yearly)</u>											
Year											
2019	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2023	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2024	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2025	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2026	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2027	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2028	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2029	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2030	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2031	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2032	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2033	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2034	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2035	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2036	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2037	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2038	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

AMP Transmission LLC

Debt Service Workpaper - Monthly

Debt Service Payments - Year End ~~12XX/31XX/2019XX~~

This tab is to accommodate projects that may go in service or close mid-year in any particular month

Add Additional Project Columns and lines as needed

AMPT Projects			Project #1	Project #2	Project #3	Project #4	Project #5	Project #6	Project #7	Project #8	Project #9	Project #10
From WP06	Total Debt Service Over Loan Term		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
<u>Debt Service Schedule (Monthly)</u>												
Year	Month											
2019	1/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	2/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	3/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	4/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	5/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	6/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	7/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	8/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	9/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	10/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	11/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	12/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	1/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	2/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	3/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	4/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	5/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	6/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	7/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	8/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	9/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	10/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	11/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	12/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	1/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	2/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	3/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	4/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	5/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	6/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	7/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	8/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	9/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	10/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	11/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	12/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	1/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	2/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	3/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	4/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	5/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	6/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	7/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	8/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	9/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	10/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	11/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	12/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2023	1/1/2023		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

## AMP Transmission LLC

Debt Service Workpaper - Monthly

Page 12 of 18

Debt Service Payments - Year End ~~12XX/31XX/2019XX~~

Add Additional "Other" Columns and lines as needed

Other AMPT Capitalized Equipment			Project #1	Project #2	Project #3	Project #4	Project #5	Project #6	Project #7	Project #8	Project #9	Project #10
From WP06	Total Debt Service Over Loan Term		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
<u>Debt Service Schedule (Monthly)</u>												
Year	Month											
2019	1/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	2/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	3/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	4/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	5/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	6/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	7/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	8/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	9/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	10/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	11/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	12/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	1/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	2/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	3/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	4/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	5/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	6/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	7/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	8/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	9/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	10/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	11/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	12/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	1/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	2/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	3/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	4/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	5/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	6/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	7/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	8/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	9/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	10/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	11/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	12/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	1/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	2/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	3/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	4/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	5/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	6/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	7/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	8/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	9/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	10/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	11/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	12/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2023	1/1/2023		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

**AMP Transmission LLC**  
Zonal Investment Workpaper

Line

	<u>No.</u>	<u>Components - Description</u>	
			Amounts
(a)			(b)
(c)			
1		AMPT Working Capital Loan from AMP	\$
2			
3		Prime Rate	5.25%
4			
5		Interest on Working Capital Loan <sup>1</sup>	\$
6			
7			
8		For ATRR and True-up, AMPT will record actual interest expense	
9			
10		Note 1: to Attachment H-32A, page 1, line 37	
11			
12		For ATRR and True-up, interest will be per books	
13		For PTRR, use most recent available Prime Rate when projections are done	



**AMP Transmission LLC**

**Transmission Enhancement Credit (Schedule 12  
Projects)** To be completed in conjunction with Attachment  
H-32A

Line No.	(1) <u>Reference</u>	(2) <u>Transmission</u>	(3) <u>Allocator</u>
1	Gross Transmission Plant - Total	\$	
2	Net Transmission Plant - Total		
3			
4	O&M EXPENSE		
5	Total O&M Allocated to Transmission	\$	
6	Annual Allocation Factor for O&M	%	%
7			
8	DEBT SERVICE	\$	
9	Annual Allocation Factor for Debt Service	%	%
10			
11	MARGIN REQUIREMENT	\$	
12	Annual Allocation Factor for Margin Requirement	%	%
13			
14	TAXES OTHER THAN INCOME TAXES		
15	Total Other Taxes	\$ -	
16	Annual Allocation Factor for Other Taxes	0.00%	0.00%
17			
18	<b>Annual Allocation Factor for Expense and Margin Requirement</b>	<b>Sum of line 6 through 16</b>	<b>%</b>
19			
20	<b>Add lines for projects as needed</b>		
21			
22	<b>Transmission Enhancement Credit (Schedule 2 Projects)</b>		
23	To be completed in conjunction with Attachment H-32A		
24			
25			

26	(1)		(2)		(3)		(4)		(5)		(6)		(7)		(8)		(9)		(10)		(11)		
	Line No.	Project Name		RTEP Project Number		Project Gross Plant		Annual Allocation Factor for Expense		Annual Expense Charge		Project Net Plant		Annual Allocation Factor for Return		Annual Return Charge		Project Depreciation Expense		True-up Adjustment		Annual Revenue Requirement with True-up	
27								(line 18)		(Col. 3 * Col. 4)		N/A				(Col. 6 * Col. 7)				(WP08-True-up Col. i)		(Sum Col. 5, 8, 9 & 10)	
28																							
29																							
30																							
31																							
32	1a	b		\$	-	128.15%		\$	-	N/A		0.00%		\$	-	\$	-	-		\$	-		
33		b								N/A						\$	-	\$	-	-		\$	-
34	1b	b		\$	-	128.15%		\$	-	N/A		0.00%		\$	-	\$	-	-		\$	-		
35																							
36	1c			\$	-	128.15%		\$	-			0.00%		\$	-					\$	-		
37																							

2 Transmission Enhancement Credit for Attachment H-32A Page 1, Line 9

Notes

- A Gross Transmission Plant is that identified on page 2 line 2 of Attachment H-21A.  
 B Net Transmission Plant is that identified on page 2 line 14 of Attachment H-21A.  
 C Project Gross Plant is the total capital investment for the project calculated in the same method as the gross plant value in line 1 above. This value includes subsequent capital investments required to maintain the project in-service.  
 D Project Net Plant is the Project Gross Plant Identified in Column 3 less the associated Accumulated Depreciation.  
 E Project Depreciation Expense is the actual value booked for the project and included in the Depreciation Expense in Attachment H-21A page 3 line 12.

AMP Transmission LLC  
Transmission Enhancement Credit (Schedule 12 Projects)

Add more lines as needed

Transmission Enhancement Credit - True-up  
To be completed after WP07 for the True-up Year is updated using actual data

		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
Line No.		Project Name	RTEP Project Number	Actual TEC Revenues	Projected TEC Annual Revenue Requirement	Actual TEC Revenues Allocated to Projects	Actual TEC Annual Revenue Requirement	True-up Adjustment Principal Under/(Over)	Applicable Interest on Under/(Over)	True-up Adjustment with Interest Under/(Over)
					from PTRR	[Col. c, line 1 * (Col. d, line 2x / Col. d, line 3)]	from ATRR	Col. f - Col. e	Col. g * [(line 4a / line 4b) - 1]	Col. g + Col. H
1	[A]	Actual PJM TEC Revenues for True-up Year		-						
2a			b		-	-		-	-	-
2b			b		-	-		-	-	-
2c			b		-	-		-	-	-
3		Subtotal			-	-	-			
4a		Revenue Requirement True-up with Interest						-		
4b		Revenue Requirement True-up - Over/Under Recovery						-		

NOTE  
[A] Amount included in revenues reported on page 330, column k of FERC Form 1.

**AMP Transmission LLC**  
Transmission O&M, A&G, and Other Taxes Workpaper

Add lines and other zones as needed to increase transparency

**TRANSMISSION O&M, A&G, and OTHER TAXES DETAIL**

Add Lines and Columns to if necessary to increase transparency

Line No. (a)	Item (b)	Form 1 Reference (c)	Amount (d)	Deferred (e)	Description (f)
1	<b>Total Transmission O&amp;M – 2019<del>XX</del> Projections</b>	321.112.b			From Informational AMPT Form 1 - ATRR True-up
2				Est. for Zone	
3	Total Transmission O&M Specific to ATSI zone	<u>Total</u>	<u>Alloc</u>	<u>ATSI</u>	<u>Projections</u>
4	consultant	\$0	35%	\$0	\$0 Transmission modeling and analysis services
5	consultant Implementation	\$0	100%	\$0	\$0 communications equipment
6	consultant Annual	\$0	100%	\$0	\$0 operational services for PJM communications and dispatch for transmission equip
7	consultant	\$0	35%	\$0	\$0 consulting services for equip evaluation for NERC BES compliance and Tariff eligibility
8	consultant	\$0	35%	\$0	\$0 Consultants
9	legal	\$0	50%	\$0	\$0 Legal
10	legal	\$0	100%	\$0	\$0 Legal
11	legal	\$0	100%	\$0	\$0 Legal
12	O&M Napoleon	\$0	100%	\$0	\$0 O&M on facilities
13	Meals/Travel	\$0	35%	\$0	\$0
14	Insurance	\$0	100%	\$0	\$0
15		\$0		\$0	\$0
16	List transmission specific to ATSI zone here - add rows if necessary	\$0		\$0	\$0
17		\$0		\$0	\$0 sum of transmission O&M specific to ATSI zone
18	Total Transmission O&M Specific to AEP zone				
19	List transmission specific to AEP zone here - add rows if necessary			\$ - \$ -	Add description
20	List transmission specific to AEP zone here - add rows if necessary			\$ - \$ -	Add description
21	List transmission specific to AEP zone here - add rows if necessary			\$ - \$ -	Add description
22	List transmission specific to AEP zone here - add rows if necessary			\$ - \$ -	Add description
23	List transmission specific to AEP zone here - add rows if necessary			\$ - \$ -	Add description
24				\$ - \$ -	sum of transmission O&M specific to AEP zone
25	Total Transmission O&M Specific to all zones				
26	List transmission specific to all zones here - add rows if necessary			\$ - \$ -	Add description
27	List transmission specific to all zones here - add rows if necessary			\$ - \$ -	Add description
28	List transmission specific to all zones here - add rows if necessary			\$ - \$ -	Add description
29	List transmission specific to all zones here - add rows if necessary			\$ - \$ -	Add description
30	List transmission specific to all zones here - add rows if necessary			\$ - \$ -	Add description
31				\$ - \$ -	sum of transmission O&M specific to all zones
32					

ADD LINES AND ZONES FOR DATA IN FUTURE AS NEEDED

**AMP Transmission LLC**  
Transmission O&M, A&G, and Other Taxes  
Workpaper

Page 17 of 18

Line No.	Item	Form 1 Reference	Amount	Deferred	Description
(a)	(b)	(c)	(d)	(e)	(f)
33	<b>A&amp;G Expense</b>		3:	\$ -	From Informational Form 1 for ATRR True-up, otherwise estimate for PTRR
34					
35	AMP Labor and Over				
36	AMP Labor and Overheads Allocable to the ASTI Zone		\$0	35%	\$ - \$ - AMP staff labor and overhead
37	List A&G specific to ATSI zone here - add rows if necessary		\$0		\$ - \$ - Add description
38	List A&G specific to ATSI zone here - add rows if necessary		\$0		\$ - \$ - Add description
39	List A&G specific to ATSI zone here - add rows if necessary		\$0		\$ - \$ - Add description
40	List A&G specific to ATSI zone here - add rows if necessary		\$0		\$ - \$ - Add description
41	List A&G specific to ATSI zone here - add rows if necessary		\$0		\$ - \$ - Add description
42			\$0		\$ - \$ - sum of A&G specific to ATSI zone
43	Total A&G Specific to AEP zone				
44	List A&G specific to AEP zone here - add rows if necessary				\$ - \$ - Add description
45	List A&G specific to AEP zone here - add rows if necessary				\$ - \$ - Add description
46	List A&G specific to AEP zone here - add rows if necessary				\$ - \$ - Add description
47	List A&G specific to AEP zone here - add rows if necessary				\$ - \$ - Add description
48	List A&G specific to AEP zone here - add rows if necessary				\$ - \$ - Add description
49					\$ - \$ - sum of A&G specific to AEP zone
50	Total A&G Specific to all zones				
51	List A&G specific to all zones here - add rows if necessary				\$ - \$ - Add description
52	List A&G specific to all zones here - add rows if necessary				\$ - \$ - Add description
53	List A&G specific to all zones here - add rows if necessary				\$ - \$ - Add description
54	List A&G specific to all zones here - add rows if necessary				\$ - \$ - Add description
55	List A&G specific to all zones here - add rows if necessary				\$ - \$ - Add description
56	Total A&G Specific to all zones				\$ - \$ - sum of A&G specific to all zones
57					
58					
59	<b>Other Taxes</b>	263.i		\$ -	From Informational Form 1 for ATRR True-up, otherwise estimate for PTRR
60					
61	Other Taxes specific to ATSI Zone				
62	Other Tax specific to ATSI zone here - add rows if necessary				\$ - \$ - Add description
63	Other Tax specific to ATSI zone here - add rows if necessary				\$ - \$ - Add description
64	Other Tax specific to ATSI zone here - add rows if necessary				\$ - \$ - Add description
65	Other Tax specific to ATSI zone here - add rows if necessary				\$ - \$ - Add description
66	Other Tax specific to ATSI zone here - add rows if necessary				\$ - \$ - Add description
67	Other Tax specific to ATSI zone here - add rows if necessary				\$ - \$ - Add description
68					\$ - \$ - sum of Other Taxes specific to ATSI zone
69	Other Taxes specific to AEP Zone				
70	Other Tax specific to AEP zone here - add rows if necessary				\$ - \$ - Add description
71	Other Tax specific to AEP zone here - add rows if necessary				\$ - \$ - Add description
72	Other Tax specific to AEP zone here - add rows if necessary				\$ - \$ - Add description
73	Other Tax specific to AEP zone here - add rows if necessary				\$ - \$ - Add description
74	Other Tax specific to AEP zone here - add rows if necessary				\$ - \$ - Add description
75					\$ - \$ - sum of Other Taxes specific to AEP zone
76	Other Taxes Specific to all zones				
77	Other Tax specific to all zones here - add rows if necessary				\$ - \$ - Add description
78	Other Tax specific to all zones here - add rows if necessary				\$ - \$ - Add description
79	Other Tax specific to all zones here - add rows if necessary				\$ - \$ - Add description
80	Other Tax specific to all zones here - add rows if necessary				\$ - \$ - Add description
81	Other Tax specific to all zones here - add rows if necessary				\$ - \$ - Add description
82	Total Other Taxes Specific to all zones				\$ - \$ - sum of Other Taxes specific to all zones

# AMP Transmission LLC

## Development of Margin Requirement

Line No.	Item	12-Month Period=	2019XX
(a)	(b)		(c)
1	Debt Service Payments <sup>1</sup>		\$ -
2			
3	Less:		
4	Interest on Working Capital Loans (WP06b)		\$ -
5	Premium paid on Debt and included in debt service		\$ -
6	Other Adjustments needed to reflect only Debt Service on Assets		\$ -
7	Add Additional deductions to Debt Service Payments as needed		\$ -
8			
9	Net Debt Service Payments (line 1 - lines 4 through 7)		\$ -
10	Margin Factor (fixed)		40%
11	Margin Requirement (line 9 x line 10) - To H-32A line		\$ -
12			
13	Notes:		
14	1. Excludes any Debt Service related to Acquisition Adjustments if any per WP06		

**Attachment H-32B to the PJM OATT  
(AMPT Formula Rate Implementation Protocols)  
(Marked)**

**ATTACHMENT H-32B**

**ATTACHMENT H-32B-1**

**AMP Transmission, LLC  
Formula Rate Implementation Protocols**

**ATTACHMENT H-32B-1**

**ANNUAL TRUE-UP, INFORMATION EXCHANGE,  
AND CHALLENGE PROCEDURES  
(CALENDAR YEAR BASIS)**

The Formula Rate Template (“Template”) (Attachment H-32A), and these Formula Rate Implementation Protocols (“Protocols”) together comprise the Formula Rate of AMP Transmission, LLC (“AMPT”) for transmission revenue requirement determinations under the PJM Interconnection, LLC (“PJM”) Open Access Transmission Tariff (“PJM Tariff”).<sup>1/</sup> AMPT shall follow the instructions specified in the Formula Rate to calculate its Transmission Revenue Requirement, initially on a projected basis (the Projected Transmission Revenue Requirement), and, when actual data are available, on an actual basis (the Actual Transmission Revenue Requirement), utilizing its Formula Rate Template for such calculations. The Projected Transmission Revenue Requirement and the Actual Transmission Revenue Requirement each shall be determined for January 1 to December 31 of a given calendar year (the “Rate Year”). The Formula Rate shall become effective for recovery of AMPT’s Transmission Revenue Requirement upon the effective date for incorporation into the PJM Tariff through a filing by PJM and AMPT with the Federal Energy Regulatory Commission (“FERC” or “Commission”) under the Federal Power Act (“FPA”), 16 U.S.C. § 824d.

- <sup>1/</sup> These protocols shall be applied to AMPT's transmission revenue requirement determinations in PJM Zones in which all other Transmission Owners calculate their transmission revenue requirements on a calendar year basis.

**Section 1. Annual Projection**

- a. No later than October 31 preceding a Rate Year, and each subsequent Rate Year, AMPT shall determine its Projected Transmission Revenue Requirement ("PTRR") for the upcoming Rate Year in accordance with the Formula Rate, which shall include the True-Up Adjustment described and defined in Section 2 below, if applicable (the PTRR and any applicable True-Up Adjustment together comprising the "Annual Projection"). AMPT shall cause an electronic version of the Annual Projection to be posted in both a Portable Document Format ("PDF") and fully-functioning Excel file at a publicly accessible location on PJM's internet website and OASIS. The date on which the posting occurs shall be that year's "Annual Projection Publication Date."
- b. The posting of the Annual Projection shall:
- (i) Provide the Formula Rate calculations and all inputs thereto, as well as supporting documentation and workpapers for data that are used in the Annual Projection;
  - (ii) Include all inputs in sufficient detail to identify the components of AMPT's Annual Projection, explanations of the bases for the projections and input data, and sufficient detail and explanation to enable Interested Parties <sup>2/</sup> to replicate the calculation of the Annual Projection;

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<sup>2/</sup> As used in these Protocols, "Interested Parties" shall include but not be limited to: (i) any Eligible Customer under the PJM Tariff; (ii) any regulatory agency with rate jurisdiction over a public utility located within the PJM



footprint; (iii) any consumer advocate authorized by state law to review and contest the rates for any such public utility; and (iv) any party with standing under FPA section 205 or section 206.

(iii) With respect to any Accounting Changes (as that term is defined in Section

3.e.iii.A):

A. Identify any Accounting Changes including:

- i. The initial implementation of an accounting standard or policy;
- ii. The initial implementation of accounting practices for unusual or unconventional items where FERC has not provided specific accounting direction;
- iii. Correction of errors and prior period adjustments that impact the Annual Projection calculation; and
- iv. The implementation of new estimation methods or policies that change prior estimates.

B. Identify items included in the Annual Projection at an amount other than on a historic cost basis (*e.g.*, fair value adjustments);

C. Identify any reorganization or merger transaction during the previous year and explain the effect of the accounting for such transaction(s) on inputs to the Annual Projection; and

D. Provide, for each item identified pursuant to Sections 1.b.iii.A through 1.b.iii.C of these Protocols, a narrative explanation of the individual impact of such changes on the Annual Projection.

- (iv) Include the following information related to affiliate cost allocation:
  - A. A detailed description of the methodologies used to allocate and directly assign costs between AMPT and its affiliates by service category or function, including any changes to such cost allocation methodologies from the prior year, and the reasons for those changes; and
  - B. The magnitude of such costs that have been allocated or directly assigned between AMPT and each affiliate by service category or function.
- c. If the date for making the posting of the Annual Projection should fall on a weekend or a holiday recognized by FERC, then the posting shall be made no later than the next business day.<sup>3/</sup> Within five (5) calendar days of the posting, PJM shall provide notice of such posting via the PJM Members Committee email subscription (“PJM Exploder List”). Interested Parties can subscribe to the PJM Exploder List on the PJM website.
- d. Together with the posting of the Annual Projection, AMPT shall cause to be posted on the PJM internet website and OASIS, and distributed to the PJM Exploder List, the time, date, location, and remote-access information for a stakeholder meeting with Interested Parties in order for AMPT to explain its Annual Projection and to provide Interested Parties an opportunity to seek information and clarifications regarding the Annual Projection (“Annual Projection Meeting”). The Annual Projection Meeting shall be held no fewer

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<sup>3/</sup> For the purposes of these Protocols, if any deadline included in these Protocols should fall on a weekend or a holiday recognized by FERC, then the deadline shall be extended to no later than the next business day.

than twenty (20) business days and no more than thirty (30) business days after the posting of the Annual Projection. Notice of the Annual Projection Meeting shall be provided via the PJM Exploder List no fewer than seven (7) calendar days prior to the meeting. AMPT will provide remote access to the Annual Projection Meeting in order to ease burdens (e.g., travel costs) to ensure all Interested Parties have the opportunity to participate.

- e. To the extent AMPT agrees to make changes in the Annual Projection for a given Rate Year, such revised Annual Projection shall be promptly posted at a publicly accessible location on PJM's internet website and OASIS, and e-mailed to the PJM Exploder List. Changes posted prior to November 30 preceding the Rate Year, or the next business day if November 30 is not a business day (or such later date as can be accommodated under PJM's billing practices), shall be reflected in the Annual Projection for the Rate Year; changes posted after that date will be reflected, as appropriate, in the True-Up Adjustment for the Rate Year.
- f. The PTRR, including the True-Up Adjustment, for each Rate Year shall be subject to review, challenge, true-up, and refunds or surcharges with interest, to the extent and in the manner provided in these Protocols.

## **Section 2. True-Up Adjustment**

- a. Using data included in its informational FERC Form No. 1 Document<sup>4/</sup> for the preceding calendar year, AMPT will calculate the amount of under- or over-collection of its Actual Transmission Revenue Requirement ("ATRR") during the preceding Rate Year ("True-

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<sup>4/</sup> Although AMPT is not required to file a FERC Form 1, it will include in its Annual Update and file with the Commission on an informational basis each year a document (the "FERC Form 1 Document") that presents its financial and operating data for the previous year in the format of, and in accordance with the instructions to, the FERC Form 1.

Up Adjustment”). The True-Up Adjustment shall be the sum of the True-Up Adjustment Over/Under Recovery as determined in Section 2(b) and the Interest on the True-Up Adjustment Over/Under Recovery as determined in Section 2(c).

- b. The amount collected as AMPT’s transmission revenue requirement during the preceding calendar year will be compared to AMPT’s ATRR for the preceding Rate Year calculated in accordance with AMPT’s Formula Rate and based upon (i) AMPT’s informational FERC Form No. 1 Document for that same Rate Year, (ii) any FERC orders specifically applicable to AMPT’s calculation of its Transmission Revenue Requirement, (iii) the books and records of AMPT, which shall be maintained consistent with the FERC Uniform System of Accounts (“USofA”), (iv) FERC accounting policies and practices applicable to the calculation of annual revenue requirements under formula rates, and (v) any aspects of the PJM Tariff Governing Documents<sup>5/</sup> that apply to the calculation of annual revenue requirements under individual transmission owner formula rates, to determine any over- or under-recovery (“True-Up Adjustment Over/Under Recovery”).
- c. Interest on any True-Up Adjustment Over/Under Recovery shall be calculated for the thirty-six (36) months during which the over or under recovery in the revenue requirement remains outstanding (*i.e.*, from January 1 of the Rate Year being trued-up through December 31 of the year in which the True-Up Adjustment Over/Under recovery is credited or collected). The interest rate to be applied to the True-Up Adjustment Over/Under Recovery amounts will be determined using the average monthly FERC

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<sup>5/</sup> “PJM Tariff Governing Documents” include the PJM Tariff, Bylaws, Criteria, and Membership Agreements.

Interest Rate (as determined pursuant to 18 C.F.R. § 35.19a) for the twenty (20) months from the beginning of the Rate Year being trued-up through August 31 of the following year.

### **Section 3. Annual Update**

- a. On or before June 1 of the year following each Rate Year, AMPT shall calculate its ATRR and the True-Up Adjustment as described in Section 2 (the ATRR and the True-Up Adjustment together comprising the “Annual Update”) for such Rate Year and, together with such other information described in this Section 3, shall cause such Annual Update to be posted, in both a PDF and fully-functioning Excel format, at a publicly accessible location on PJM’s internet website and OASIS. Within five (5) calendar days of such posting, PJM shall provide notice of such posting via the PJM Exploder List.
- b. If the date for making the Annual Update posting should fall on a weekend or a holiday recognized by the FERC, then the posting shall be due on the next business day.
- c. The date on which the posting occurs shall be that year’s “Annual Update Publication Date.”
- d. Together with the posting of the Annual Update, AMPT shall cause to be posted on the PJM website and OASIS the time, date, location, and remote-access information for a stakeholder meeting with Interested Parties in order for AMPT to explain its Annual Update and to provide Interested Parties an opportunity to seek information and clarifications regarding the Annual Update (“Annual Update Meeting”). The Annual Update Meeting shall be held between a date that is not sooner than twenty (20) business days after the Annual Update Publication Date and September 1, provided that notice of the Annual Update Meeting shall be given via the PJM Exploder List no fewer than seven

(7) calendar days prior to the meeting. AMPT will provide remote access to the Annual Update Meeting in order to ease burdens (*e.g.*, travel costs) to ensure all Interested Parties have the opportunity to participate.

e. The Annual Update posting for the Rate Year:

- (i) Shall provide, via the Formula Rate worksheets, sufficiently detailed supporting documentation for data (and all adjustments thereto or allocations thereof) used in the Formula Rate that are not stated in the FERC Form No. 1 Document;<sup>6/</sup>
- (ii) Shall provide sufficient detail and sufficient explanation to enable Interested Parties to replicate the calculation of the Annual Update results from the FERC Form No. 1 Document and verify that each input to the Template is consistent with the requirements of the Formula Rate;
- (iii) Shall identify:
  - A. Any change in accounting that affects inputs to the Template or the resulting charges billed under the Formula Rate (“Accounting Change”), including:
    - i. The initial implementation of an accounting standard or policy;

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<sup>6/</sup> It is the intent of the Formula Rate, including the supporting explanations and allocations described therein, that each input to the Formula Rate for purposes of determining the actual Net Revenue Requirement for a given Rate Year will be either taken directly from the FERC Form No. 1 Document or reconcilable to the FERC Form No. 1 Document by the application of clearly identified and supported information. If the Form No. 1 is superseded, the successor form(s) shall be utilized and supplemented as necessary to provide equivalent information as that provided in the Form No. 1. If the FERC Form No. 1 is discontinued, equivalent information as that provided in the FERC Form No. 1 shall be utilized.

- ii. The initial implementation of accounting practices for unusual or unconventional items where FERC has not provided specific accounting direction;
    - iii. Correction of errors and prior period adjustments that impact the True-Up Adjustment calculation; and
    - iv. The implementation of new estimation methods or policies that change prior estimates.
  - B. Any items included in the Annual Update at an amount other than on a historic cost basis (*e.g.*, fair value adjustments);
  - C. Any reorganization or merger transaction during the previous year and an explanation of the effect of the accounting for such transaction(s) on inputs to the Annual Update; and
  - D. For each item identified pursuant to Sections 3.e.iii.A – C of these Protocols, the individual impact (in narrative format) of such changes on the Annual Update;
- (iv) Shall be subject to review and challenge in accordance with the procedures set forth in Sections 4, 5, and 6 of these Protocols;
  - (v) Shall be subject to review and challenge in accordance with the procedures set forth in these Protocols with respect to the prudence of any costs and expenditures included for recovery in the Annual Update; provided,

however, that nothing in these Protocols is intended to modify the Commission's applicable precedent with respect to the burden of going forward or burden of proof under formula rates in such prudence challenges; and

- (vi) Shall not seek to modify the Formula Rate and shall not be subject to challenge by any Interested Party seeking to modify the Formula Rate (*i.e.*, any modifications to the Formula Rate will require, as applicable, appropriate FPA filings or the initiation of an FPA investigation).

- f. The following Formula Rate inputs shall be stated values to be used in the Formula Rate until changed pursuant to a filing with the Commission requesting such change:
  - (i) Margin Factor; (ii) costs subject to deferred cost recovery; and (iii) amortization period over which deferred costs are recovered.

- g. **Example – Timelines for 2019 Annual Projection and 2020 Annual Update:**

On or before October 31, 2018, AMPT will determine the PTRR for the 2019 Rate Year. AMPT will post the Annual Projection for the 2019 Rate Year in accordance with Section 1 above. On or before June 1, 2020, AMPT will post its Annual Update, consisting of the ATRR and True-Up Adjustment for the 2019 Rate Year determined pursuant to Section 2 above. Such True-Up Adjustment will be reflected in the Annual Projection of AMPT's Transmission Revenue Requirement for the 2021 Rate Year posted on or before October 31, 2020.

#### **Section 4. Annual Review Procedures**

Each Annual Update and Annual Projection shall be subject to the following review procedures ("Annual Review Procedures"):



- a. Interested Parties shall have up to the later of two-hundred-ten (210) calendar days after the applicable Publication Date, or thirty (30) calendar days after the receipt of all responses to timely submitted information requests (unless such period is extended with the written consent of AMPT or by FERC order) (“Review Period”), to review the calculations and to notify AMPT in writing of any specific challenges to the Annual Update or Annual Projection (“Preliminary Challenge”), including challenges related to Accounting Changes. An Interested Party submitting a Preliminary Challenge must specify the inputs, supporting explanations, allocations, calculations, or other information to which it objects, and provide an appropriate explanation and documents to support its challenge. AMPT shall cause to be posted all Preliminary Challenges at a publicly accessible location on PJM’s internet website and OASIS, and a link to the website will be e-mailed to the PJM Exploder List.
- b. In the event of a Preliminary Challenge, AMPT will appoint a senior representative to work with the Interested Party (or its representatives) toward a resolution of the dispute.
- c. AMPT shall respond in writing to a Preliminary Challenge within twenty (20) business days of receipt, and its response shall notify the challenging party of the extent to which AMPT agrees or disagrees with the challenge. If AMPT disagrees with the Preliminary Challenge, it will provide the Interested Party with an explanation supporting the challenged inputs, explanations, allocations, calculations, or other information. AMPT shall promptly cause to be posted its responses to all Preliminary Challenges at a publicly accessible location on PJM’s internet website and OASIS, and a link to the website will be e-mailed to the PJM Exploder List. Notwithstanding the foregoing, Preliminary Challenges and responses to Preliminary Challenges that include material deemed by

AMPT to be confidential information will not be publicly posted but will be made available to requesting parties pursuant to a confidentiality agreement to be executed by AMPT and the requesting party.

- d. AMPT shall respond to all Preliminary Challenges submitted during the Review Period by no later than thirty (30) calendar days after the end of the Review Period.
- e. Interested Parties shall have up to one-hundred-fifty (150) calendar days after each annual Publication Date (unless such period is extended with the written consent of AMPT or by FERC order) to serve reasonable information requests on AMPT (“Discovery Period”).
- f. Information requests shall be limited to what is necessary to determine: (i) the extent, effect, or impact of an Accounting Change; (ii) whether the Annual Update or Annual Projection fails to include data properly recorded in accordance with the Protocols; (iii) the proper application of the Template and procedures in the Protocols; (iv) the accuracy of data and consistency with the Formula Rate of the charges shown in the Annual Update or Annual Projection; (v) the prudence of the actual costs and expenditures, including procurement methods and cost control methodologies; (vi) the effect of any change to the underlying USofA or FERC Form No. 1 Document; and (vii) any other information that may reasonably have substantive effect on the calculation of the charge pursuant to the Formula Rate. The information requests shall not otherwise be directed to ascertaining whether the Formula Rate is just and reasonable. Information requests shall not solicit information concerning costs or allocations where the costs or allocation methods have been determined to be appropriate by FERC in the context of prior AMPT Annual Updates, except that such information requests shall be permitted if

- they (i) seek to determine if there has been a change in circumstances, (ii) are in connection with corrections pursuant to Section 6 of these Protocols, or (iii) relate to costs or allocations that have not previously been challenged and adjudicated by FERC.
- g. AMPT shall make a good faith effort to respond to reasonable information requests pertaining to the Annual Update or Annual Projection within fifteen (15) business days of receipt of such requests. AMPT shall respond to all reasonable information requests no later than thirty (30) calendar days after the end of the Discovery Period. AMPT will cause to be posted on the PJM website and OASIS all information requests from Interested Parties and AMPT's response(s) to such requests, and a link to the website will be e-mailed to the PJM Exploder List. Notwithstanding the foregoing, information and document requests and responses to information and document requests that include material deemed by AMPT to be confidential information will not be publicly posted but will be made available to requesting parties pursuant to a confidentiality agreement to be executed by AMPT and the requesting party. Voluminous materials will be made available at a physical AMPT site.
- h. AMPT shall not claim that responses to information and document requests provided pursuant to these Protocols are subject to any settlement privilege in any subsequent FERC proceeding addressing AMPT's Annual Update or Annual Projection.
- i. To the extent AMPT and any Interested Party(ies) are unable to resolve disputes related to information requests submitted in accordance with these Annual Review Procedures, AMPT or the Interested Party may petition the FERC to appoint an Administrative Law Judge as a discovery master to resolve the discovery dispute(s) in accordance with these Protocols and consistent with the FERC's discovery rules.

- j. Preliminary Challenges or Formal Challenges (as described in Sections 4 and 5) related to Accounting Changes shall be treated in the same manner under these Protocols as other challenges to the Annual Update or Annual Projection. Failure to make a Preliminary Challenge with respect to an Accounting Change in an Annual Update or Annual Projection shall not act as a bar with respect to a Formal Challenge with respect to that Annual Update or Annual Projection provided that the Interested Party submitted a Preliminary Challenge with respect to one or more other issues. Nor shall such failure bar a subsequent Preliminary Challenge related to a subsequent Annual Update or Annual Projection to the extent such Accounting Change affects the subsequent Annual Update or Annual Projection.
- k. If a change made by AMPT to its accounting policies, practices, or procedures, or the application of the Formula Rate, is found by the FERC to be unjust, unreasonable, or unduly discriminatory or preferential, then the calculation of the charges to be assessed during the Rate Year then under review, and the charges to be assessed during any subsequent Rate Years, including any True-up Adjustments, shall not include such change, but shall include any remedy that may be prescribed by FERC in the exercise of its discretion as of the effective date of such remedy, to ensure that the Formula Rate continues to operate in a manner that is just, reasonable, and not unduly discriminatory or preferential.

## **Section 5. Resolution of Challenges**

- a. Interested Parties shall have up to two-hundred-seventy (270) days following the applicable Publication Date (unless such period is extended with the written consent of AMPT or by FERC order), to file a challenge with the FERC (“Formal Challenge”). Such

Formal Challenge shall be submitted in the same docket as the AMPT informational filing and shall be served on AMPT by electronic service on the date of such filing in accordance with Section 385.2010(f)(3) of the Commission's regulations. Subject to any applicable confidentiality and Critical Energy Infrastructure Information restrictions, all information and correspondence produced by AMPT pursuant to these Protocols may be included in any Formal Challenge or other FERC proceeding relating to the Formula Rate.

b. Formal Challenges are to be filed pursuant to these Protocols, rather than under Rule 206, and shall:

- (i) Clearly identify the action or inaction which is alleged to violate the Formula Rate Template or Protocols;
- (ii) Explain how the action or inaction violates the filed rate Template or Protocols;
- (iii) Set forth the business, commercial, economic or other issues presented by the action or inaction as such relate to or affect the party filing the Formal Challenge, including
  - A. The extent or effect of an Accounting Change;
  - B. Whether the Annual Update or Annual Projection fails to include data properly recorded in accordance with these Protocols;
  - C. The proper application of the Template and procedures in these Protocols;

- D. The accuracy of the data and consistency with the Formula Rate of the charges shown in the Annual Update or Annual Projection;
  - E. The prudence of actual costs and expenditures;
  - F. The effect of any change to the underlying USofA or the FERC Form No. 1 Document; or
  - G. Any other information that may reasonably have substantive effect on the calculation of the charge pursuant to the Formula Rate.
- (iv) Make a good faith effort to quantify the financial impact or burden (if any) created for the party filing the Formal Challenge as a result of the action or inaction;
  - (v) State whether the issues presented are pending in an existing Commission proceeding or a proceeding in any other forum in which the filing party is a party, and if so, provide an explanation why timely resolution cannot be achieved in that forum;
  - (vi) State the specific relief or remedy requested, including any request for stay or extension of time, and the basis for that relief;
  - (vii) Include all documents that support the facts in the Formal Challenge in possession of, or otherwise attainable by, the filing party, including, but not limited to, contracts and affidavits; and

- (viii) State whether the filing party utilized the Preliminary Challenge procedures described in these Protocols to dispute the action or inaction raised by the Formal Challenge, and, if not, describe why not.
- c. Preliminary and Formal Challenges shall be limited to issues that may be necessary to determine: (i) the extent or effect of an Accounting Change; (ii) whether the Annual Update or Annual Projection fails to include data properly recorded in accordance with these Protocols; (iii) the proper application of the Formula Rate and procedures in these Protocols; (iv) the accuracy of data and consistency with the Formula Rate of the calculations shown in the Annual Update and Annual Projection; (v) the prudence of actual costs and expenditures; (vi) the effect of any change to the underlying USofA or FERC Form No. 1 Document; or (vii) any other information that may reasonably have substantive effect on the calculation of the charge pursuant to the Formula Rate.
- d. Failure to raise an issue in a Preliminary Challenge shall not bar an Interested Party from raising that issue in a Formal Challenge, provided the Interested Party submitted a Preliminary Challenge during the Review Period with respect to one or more other issues. Failure to pursue an issue through a Preliminary Challenge or to lodge a Formal Challenge regarding any issue as to a given Annual Update shall bar pursuit of such issue with respect to that Annual Update, but shall not bar pursuit of such issue or the lodging of a Formal Challenge as to such issue as it relates to a subsequent Annual Update.
- e. Any response by AMPT to a Formal Challenge must be submitted to the FERC within thirty (30) calendar days of the date of the filing of the Formal Challenge (or such later date as FERC may establish), and shall be served on the filing party(ies) and the PJM Exploder List on the date of such filing.

- f. In any Formal Challenge proceeding concerning an Annual Update (including corrections), Annual Projection, or Accounting Change(s), AMPT shall demonstrate the justness and reasonableness of the rate resulting from its application of the Formula Rate by demonstrating that it has correctly applied the terms of the Formula Rate consistent with these Protocols and that it followed the applicable requirements and procedures in applying the Formula Rate. Nothing herein is intended to alter the burdens applied by FERC with respect to prudence challenges.
- g. Except as specifically provided herein, nothing herein shall be deemed to limit in any way the right of AMPT to file unilaterally, pursuant to the FPA and the regulations thereunder, an application seeking changes to the Formula Rate or to any of the stated value inputs requiring a prior filing under these Protocols (including, but not limited to, the Margin Factor, and the scope of and amortization period for any deferred costs), or the right of any other party or the Commission to seek such changes pursuant to the FPA and the regulations thereunder.

#### **Section 6. Changes to Annual Updates**

If AMPT determines or concedes that corrections to the Annual Update are required, whether under Section 4 or 5 of these Protocols, including but not limited to those requiring corrections to its FERC Form No. 1 Document, or input data used for a Rate Year that would have affected the Annual Update for that Rate Year, such corrections shall be reflected as adjustments in the Annual Update for the next Rate Year, with interest calculated in accordance with the FERC Interest Rate (as determined pursuant to 18 C.F.R. § 35.19a). This reconciliation mechanism shall apply in lieu of mid-Rate Year adjustments.



## **ATTACHMENT H-32B**

### **AMP Transmission, LLC** **Formula Rate Implementation Protocols**

#### **ATTACHMENT H-32B-2**

#### **ANNUAL TRUE-UP, INFORMATION EXCHANGE,** **AND CHALLENGE PROCEDURES** **(NON-CALENDAR YEAR BILLING ZONES)**

The Formula Rate Template (“Template”) (Attachment H-32A), and these Formula Rate Implementation Protocols for Non-Calendar Year Billing Zones (“Protocols”) together comprise the Formula Rate of AMP Transmission, LLC (“AMPT”) for transmission revenue requirement determinations under the PJM Interconnection, LLC (“PJM”) Open Access Transmission Tariff (“PJM Tariff”) in zones in which billing is performed on other than a calendar year basis. For transmission zones in which billing is performed on a calendar year basis, the protocols set forth in Attachment H-32B-1 shall apply.

AMPT shall follow the instructions specified in the Formula Rate to calculate its Transmission Revenue Requirement, initially on a projected basis (the Projected Transmission Revenue Requirement), and, when actual data are available, on an actual basis (the Actual Transmission Revenue Requirement), utilizing its Formula Rate Template for such calculations. The Projected Transmission Revenue Requirement (“PTRR”) and the Actual Transmission Revenue Requirement (“ATRR”) each shall be determined for January 1 to December 31 of a given calendar year (the “Financial Year”). The PTRR will be recovered through charges to customers assessed during the twelve-month billing period used in the zone (the “Rate Year”). For purposes of clarity, a given Financial Year may be referred to in these Protocols as “Financial Year n” and the Rate Year in which the PTRR for Financial Year n is recovered may be referred to as “Rate Year n.” The Formula Rate shall become effective for recovery of

AMPT's Transmission Revenue Requirement upon the effective date for incorporation into the PJM Tariff through a filing by PJM and AMPT with the Federal Energy Regulatory Commission ("FERC" or "Commission") under the Federal Power Act ("FPA"), 16 U.S.C. § 824d.

### **Section 1. Annual Projection**

a. No later than sixty (60) days before the start of a Rate Year, and each subsequent Rate Year, AMPT shall determine its PTRR for the then-current Financial Year which shall be recovered through charges during the upcoming Rate Year in accordance with the Formula Rate, and which shall include the True-Up Adjustment described and defined in Section 2 below (the PTRR and any applicable True-Up Adjustment together comprising the "Annual Projection"). For example, for a Rate Year beginning on June 1, 2020, the PTRR would be calculated based upon the Financial Year January 1, 2020 through December 31, 2020. AMPT shall cause an electronic version of the Annual Projection to be posted in both a Portable Document Format ("PDF") and fully-functioning Excel file at a publicly accessible location on PJM's internet website and OASIS. The date on which the posting occurs shall be that year's "Annual Projection Publication Date."

b. The posting of the Annual Projection shall:

(i) Provide the Formula Rate calculations and all inputs thereto, as well as supporting documentation and workpapers for data that are used in the Annual Projection;

(ii) Include all inputs in sufficient detail to identify the components of AMPT's Annual Projection, explanations of the bases for the projections and input data, and sufficient detail and explanation to enable "Interested Parties" [defined as including but not limited to: (i) any Eligible Customer under the PJM Tariff; (ii) any regulatory agency with rate jurisdiction

over a public utility located within the PJM footprint; (iii) any consumer advocate authorized by state law to review and contest the rates for any such public utility; and (iv) any party with standing under FPA section 205 or section 206] to replicate the calculation of the Annual Projection;

(iii) With respect to any Accounting Changes (as that term is defined in Section 3.e.iii.A):

A. Identify any Accounting Changes including:

i. The initial implementation of an accounting standard or policy;

ii. The initial implementation of accounting practices for unusual or unconventional items where FERC has not provided specific accounting direction;

iii. Correction of errors and prior period adjustments that impact the Annual Projection calculation; and

iv. The implementation of new estimation methods or policies that change prior estimates.

B. Identify items included in the Annual Projection at an amount other than on a historic cost basis (e.g., fair value adjustments);

C. Identify any reorganization or merger transaction during the previous year and explain the effect of the accounting for such transaction(s) on inputs to the Annual Projection; and

D. Provide, for each item identified pursuant to Section 1.b.iii.A - C of these Protocols, a narrative explanation of the individual impact of such changes on the Annual Projection.

(iv) Include the following information related to affiliate cost allocation:

A. A detailed description of the methodologies used to allocate and directly assign costs between AMPT and its affiliates by service category or function, including any changes to such cost allocation methodologies from the prior year, and the reasons for those changes; and

B. The magnitude of such costs that have been allocated or directly assigned between AMPT and each affiliate by service category or function.

c. If the date for making the posting of the Annual Projection should fall on a weekend or a holiday recognized by FERC, then the posting shall be made no later than the next business day. For the purposes of these Protocols, if any deadline included in these Protocols should fall on a weekend or a holiday recognized by FERC, then the deadline shall be extended to no later than the next business day. Within five (5) calendar days of the posting, PJM shall provide notice of such posting via the PJM Members Committee email subscription ("PJM Exploder List"). Interested Parties can subscribe to the PJM Exploder List on the PJM website.

d. Together with the posting of the Annual Projection, AMPT shall cause to be posted on the PJM internet website and OASIS, and distributed to the PJM Exploder List, the time, date, location, and remote-access information for a stakeholder meeting with Interested Parties in order for AMPT to explain its Annual Projection and to provide Interested Parties an opportunity to seek information and clarifications regarding the Annual Projection ("Annual

Projection Meeting”). The Annual Projection Meeting shall be held no fewer than twenty (20) business days and no more than thirty (30) business days after the posting of the Annual Projection. Notice of the Annual Projection Meeting shall be provided via the PJM Exploder List no fewer than seven (7) calendar days prior to the meeting. AMPT will provide remote access to the Annual Projection Meeting in order to ease burdens (e.g., travel costs) to ensure all Interested Parties have the opportunity to participate.

e. To the extent AMPT agrees to make changes in the Annual Projection for a given Financial Year, such revised Annual Projection shall be promptly posted at a publicly accessible location on PJM’s internet website and OASIS, and e-mailed to the PJM Exploder List. Changes posted earlier than thirty (30) days before the start of the Rate Year, or the next business day if such date is not a business day (or such later date as can be accommodated under PJM’s billing practices), shall be reflected in the Annual Projection to be charged during the Rate Year; changes posted after that date will be reflected, as appropriate, in the True-Up Adjustment for the Financial Year.

f. The PTRR, including the True-Up Adjustment, for each Financial Year, shall be subject to review, challenge, true-up, and refunds or surcharges with interest, to the extent and in the manner provided in these Protocols.

## **Section 2. True-Up Adjustment**

a. Although AMPT is not required to file a FERC Form 1, it will include in its Annual Update, as defined below, and file with the Commission on an informational basis each year a document (the “FERC Form 1 Document”) that presents its financial and operating data for the previous year in the format of, and in accordance with the instructions to, the FERC Form 1. Using data included in its informational FERC Form No. 1 Document for the preceding

Financial Year n, AMPT will calculate the amount of under- or over-collection of its ATRR to be recovered during the Rate Year n+2 (“True-Up Adjustment”). The True-Up Adjustment shall be the sum of the True-Up Adjustment Over/Under Recovery as determined in Section 2(b) and the Interest on the True-Up Adjustment Over/Under Recovery as determined in Section 2(c).

b. The amount collected for AMPT’s transmission revenue requirement during the any Rate Year will be compared to AMPT’s ATRR for the corresponding Financial Year calculated in accordance with AMPT’s Formula Rate and based upon (i) AMPT’s informational FERC Form No. 1 Document for that same Financial Year, (ii) any FERC orders specifically applicable to AMPT’s calculation of its Transmission Revenue Requirement, (iii) the books and records of AMPT, which shall be maintained consistent with the FERC Uniform System of Accounts (“USofA”), (iv) FERC accounting policies and practices applicable to the calculation of annual revenue requirements under formula rates, and (v) any aspects of the PJM Tariff Governing Documents, which include the PJM Tariff, Bylaws, Criteria, and Membership Agreements, that apply to the calculation of annual revenue requirements under individual transmission owner formula rates, to determine any over- or under-recovery (“True-Up Adjustment Over/Under Recovery”).

c. Interest on any True-Up Adjustment Over/Under Recovery shall be calculated for the time period during which the over or under recovery in the revenue requirement remains outstanding. For example, the True-Up Adjustment Over/Under Recovery for Financial Year n shall be collected or refunded with interest in Rate Year n+2. The interest rate to be applied to the True-Up Adjustment Over/Under Recovery amounts will be determined using the average monthly FERC Interest Rate (as determined pursuant to 18 C.F.R. § 35.19a) for the twenty (20) months from the beginning of Rate Year n.

### **Section 3. Annual Update**

a. On or before sixty days prior to the start of Rate Year n, AMPT shall calculate and post the PTRR for Financial Year n, the ATRR for Financial Year n-2, and the True Up Adjustment for Financial Year n-2 (“Annual Update”). AMPT shall cause such Annual Update to be posted, in both a PDF and fully-functioning Excel format, at a publicly accessible location on PJM’s internet website and OASIS. Within five (5) calendar days of such posting, PJM shall provide notice of such posting via the PJM Exploder List. There will not be a True-Up Adjustment until this rate has been in effect for two Rate Years.

b. If the date for making the Annual Update posting should fall on a weekend or a holiday recognized by the FERC, then the posting shall be due on the next business day.

c. The date on which the posting occurs shall be that year’s “Annual Update Publication Date.”

d. Together with the posting of the Annual Update, AMPT shall cause to be posted on the PJM website and OASIS the time, date, location, and remote-access information for a stakeholder meeting with Interested Parties in order for AMPT to explain its Annual Update and to provide Interested Parties an opportunity to seek information and clarifications regarding the Annual Update (“Annual Update Meeting”). The Annual Update Meeting shall be held between a date that is not sooner than twenty (20) business days and no later than ninety (90) business days after the Annual Update Publication Date, provided that notice of the Annual Update Meeting shall be given via the PJM Exploder List no fewer than seven (7) calendar days prior to the meeting. AMPT will provide remote access to the Annual Update Meeting in order to ease burdens (e.g., travel costs) to ensure all Interested Parties have the opportunity to participate.

e. The Annual Update posting for the Rate Year:

(i) Shall provide, via the Formula Rate worksheets, sufficiently detailed supporting documentation for data (and all adjustments thereto or allocations thereof) used in the Formula Rate that are not stated in the FERC Form No. 1 Document. It is the intent of the Formula Rate, including the supporting explanations and allocations described therein, that each input to the Formula Rate for purposes of determining the actual Net Revenue Requirement for a given Rate Year will be either taken directly from the FERC Form No. 1 Document or reconcilable to the FERC Form No. 1 Document by the application of clearly identified and supported information. If the Form No. 1 is superseded, the successor form(s) shall be utilized and supplemented as necessary to provide equivalent information as that provided in the Form No. 1. If the FERC Form No. 1 is discontinued, equivalent information as that provided in the FERC Form No. 1 shall be utilized;

(ii) Shall provide sufficient detail and sufficient explanation to enable Interested Parties to replicate the calculation of the Annual Update results from the FERC Form No. 1 Document and verify that each input to the Template is consistent with the requirements of the Formula Rate;

(iii) Shall identify:

A. Any change in accounting that affects inputs to the Template or the resulting charges billed under the Formula Rate (“Accounting Change”), including:

i. The initial implementation of an accounting standard or policy;



ii. The initial implementation of accounting practices for unusual or unconventional items where FERC has not provided specific accounting direction;

iii. Correction of errors and prior period adjustments that impact the True-Up Adjustment calculation; and

iv. The implementation of new estimation methods or policies that change prior estimates.

B. Any items included in the Annual Update at an amount other than on a historic cost basis (e.g., fair value adjustments);

C. Any reorganization or merger transaction during the previous Financial Year and an explanation of the effect of the accounting for such transaction(s) on inputs to the Annual Update; and

D. For each item identified pursuant to Sections 3.e.iii.A – C of these Protocols, the individual impact (in narrative format) of such changes on the Annual Update;

(iv) Shall be subject to review and challenge in accordance with the procedures set forth in Sections 4, 5, and 6 of these Protocols;

(v) Shall be subject to review and challenge in accordance with the procedures set forth in these Protocols with respect to the prudence of any costs and expenditures included for recovery in the Annual Update; provided, however, that nothing in these Protocols is intended to modify the Commission's applicable precedent with respect to the burden of going forward or burden of proof under formula rates in such prudence challenges; and

(vi) Shall not seek to modify the Formula Rate and shall not be subject to challenge by any Interested Party seeking to modify the Formula Rate (i.e., any modifications to the Formula Rate will require, as applicable, appropriate FPA filings or the initiation of an FPA investigation).

f. The following Formula Rate inputs shall be stated values to be used in the Formula Rate until changed pursuant to a filing with the Commission requesting such change: (i) Margin Factor; (ii) costs subject to deferred cost recovery; and (iii) amortization period over which deferred costs are recovered.

#### **Section 4. Annual Review Procedures**

Each Annual Update shall be subject to the following review procedures (“Annual Review Procedures”):

a. Interested Parties shall have up to the later of two-hundred-ten (210) calendar days after the applicable Publication Date, or thirty (30) calendar days after the receipt of all responses to timely submitted information requests (unless such period is extended with the written consent of AMPT or by FERC order) (“Review Period”), to review the calculations and to notify AMPT in writing of any specific challenges to the Annual Update (“Preliminary Challenge”), including challenges related to Accounting Changes. An Interested Party submitting a Preliminary Challenge must specify the inputs, supporting explanations, allocations, calculations, or other information to which it objects, and provide an appropriate explanation and documents to support its challenge. AMPT shall cause to be posted all Preliminary Challenges at a publicly accessible location on PJM’s internet website and OASIS, and a link to the website will be e-mailed to the PJM Exploder List.

b. In the event of a Preliminary Challenge, AMPT will appoint a senior representative to work with the Interested Party (or its representatives) toward a resolution of the dispute.

c. AMPT shall respond in writing to a Preliminary Challenge within twenty (20) business days of receipt, and its response shall notify the challenging party of the extent to which AMPT agrees or disagrees with the challenge. If AMPT disagrees with the Preliminary Challenge, it will provide the Interested Party with an explanation supporting the challenged inputs, explanations, allocations, calculations, or other information. AMPT shall promptly cause to be posted its responses to all Preliminary Challenges at a publicly accessible location on PJM's internet website and OASIS, and a link to the website will be e-mailed to the PJM Exploder List. Notwithstanding the foregoing, Preliminary Challenges and responses to Preliminary Challenges that include material deemed by AMPT to be confidential information will not be publicly posted but will be made available to requesting parties pursuant to a confidentiality agreement to be executed by AMPT and the requesting party.

d. AMPT shall respond to all Preliminary Challenges submitted during the Review Period by no later than thirty (30) calendar days after the end of the Review Period.

e. Interested Parties shall have up to one-hundred-fifty (150) calendar days after each annual Publication Date (unless such period is extended with the written consent of AMPT or by FERC order) to serve reasonable information requests on AMPT ("Discovery Period").

f. Information requests shall be limited to what is necessary to determine: (i) the extent, effect, or impact of an Accounting Change; (ii) whether the Annual Update fails to include data properly recorded in accordance with the Protocols; (iii) the proper application of the Template and procedures in the Protocols; (iv) the accuracy of data and consistency with the

Formula Rate of the charges shown in the Annual Update; (v) the prudence of the actual costs and expenditures, including procurement methods and cost control methodologies; (vi) the effect of any change to the underlying USofA or FERC Form No. 1 Document; and (vii) any other information that may reasonably have substantive effect on the calculation of the charge pursuant to the Formula Rate. The information requests shall not otherwise be directed to ascertaining whether the Formula Rate is just and reasonable. Information requests shall not solicit information concerning costs or allocations where the costs or allocation methods have been determined to be appropriate by FERC in the context of prior AMPT Annual Updates, except that such information requests shall be permitted if they (i) seek to determine if there has been a change in circumstances, (ii) are in connection with corrections pursuant to Section 6 of these Protocols, or (iii) relate to costs or allocations that have not previously been challenged and adjudicated by FERC.

g. AMPT shall make a good faith effort to respond to reasonable information requests pertaining to the Annual Update within fifteen (15) business days of receipt of such requests. AMPT shall respond to all reasonable information requests no later than thirty (30) calendar days after the end of the Discovery Period. AMPT will cause to be posted on the PJM website and OASIS all information requests from Interested Parties and AMPT's response(s) to such requests, and a link to the website will be e-mailed to the PJM Exploder List. Notwithstanding the foregoing, information and document requests and responses to information and document requests that include material deemed by AMPT to be confidential information will not be publicly posted but will be made available to requesting parties pursuant to a confidentiality agreement to be executed by AMPT and the requesting party. Voluminous materials will be made available at a physical AMPT site.

h. AMPT shall not claim that responses to information and document requests provided pursuant to these Protocols are subject to any settlement privilege in any subsequent FERC proceeding addressing AMPT's Annual Update.

i. To the extent AMPT and any Interested Party(ies) are unable to resolve disputes related to information requests submitted in accordance with these Annual Review Procedures, AMPT or the Interested Party may petition the FERC to appoint an Administrative Law Judge as a discovery master to resolve the discovery dispute(s) in accordance with these Protocols and consistent with the FERC's discovery rules.

j. Preliminary Challenges or Formal Challenges (as described in Sections 4 and 5) related to Accounting Changes shall be treated in the same manner under these Protocols as other challenges to the Annual Update. Failure to make a Preliminary Challenge with respect to an Accounting Change in an Annual Update shall not act as a bar with respect to a Formal Challenge with respect to that Annual Update provided that the Interested Party submitted a Preliminary Challenge with respect to one or more other issues. Nor shall such failure bar a subsequent Preliminary Challenge related to a subsequent Annual Update to the extent such Accounting Change affects the subsequent Annual Update.

k. If a change made by AMPT to its accounting policies, practices, or procedures, or the application of the Formula Rate, is found by the FERC to be unjust, unreasonable, or unduly discriminatory or preferential, then the calculation of the charges to be assessed during the Rate Year then under review, and the charges to be assessed during any subsequent Rate Years, including any True-up Adjustments, shall not include such change, but shall include any remedy that may be prescribed by FERC in the exercise of its discretion as of the effective date of such

remedy, to ensure that the Formula Rate continues to operate in a manner that is just, reasonable, and not unduly discriminatory or preferential.

## **Section 5. Resolution of Challenges**

a. Interested Parties shall have up to two-hundred-seventy (270) days following the applicable Publication Date (unless such period is extended with the written consent of AMPT or by FERC order), to file a challenge with the FERC (“Formal Challenge”). Such Formal Challenge shall be submitted in the same docket as the AMPT informational filing and shall be served on AMPT by electronic service on the date of such filing in accordance with Section 385.2010(f)(3) of the Commission’s regulations. Subject to any applicable confidentiality and Critical Energy Infrastructure Information restrictions, all information and correspondence produced by AMPT pursuant to these Protocols may be included in any Formal Challenge or other FERC proceeding relating to the Formula Rate.

b. Formal Challenges are to be filed pursuant to these Protocols, rather than under Rule 206, and shall:

(i) Clearly identify the action or inaction which is alleged to violate the Formula Rate Template or Protocols;

(ii) Explain how the action or inaction violates the filed rate Template or Protocols;

(iii) Set forth the business, commercial, economic or other issues presented by the action or inaction as such relate to or affect the party filing the Formal Challenge, including

A. The extent or effect of an Accounting Change;

B. Whether the Annual Update fails to include data properly recorded in accordance with these Protocols;

C. The proper application of the Template and procedures in these Protocols;

D. The accuracy of the data and consistency with the Formula Rate of the charges shown in the Annual Update;

E. The prudence of actual costs and expenditures;

F. The effect of any change to the underlying USofA or the FERC Form No. 1 Document; or

G. Any other information that may reasonably have substantive effect on the calculation of the charge pursuant to the Formula Rate.

(iv) Make a good faith effort to quantify the financial impact or burden (if any) created for the party filing the Formal Challenge as a result of the action or inaction;

(v) State whether the issues presented are pending in an existing Commission proceeding or a proceeding in any other forum in which the filing party is a party, and if so, provide an explanation why timely resolution cannot be achieved in that forum;

(vi) State the specific relief or remedy requested, including any request for stay or extension of time, and the basis for that relief;

(vii) Include all documents that support the facts in the Formal Challenge in possession of, or otherwise attainable by, the filing party, including, but not limited to, contracts and affidavits; and

(viii) State whether the filing party utilized the Preliminary Challenge procedures described in these Protocols to dispute the action or inaction raised by the Formal Challenge, and, if not, describe why not.

c. Preliminary and Formal Challenges shall be limited to issues that may be necessary to determine: (i) the extent or effect of an Accounting Change; (ii) whether the Annual Update fails to include data properly recorded in accordance with these Protocols; (iii) the proper application of the Formula Rate and procedures in these Protocols; (iv) the accuracy of data and consistency with the Formula Rate of the calculations shown in the Annual Update; (v) the prudence of actual costs and expenditures; (vi) the effect of any change to the underlying USofA or FERC Form No. 1 Document; or (vii) any other information that may reasonably have substantive effect on the calculation of the charge pursuant to the Formula Rate.

d. Failure to raise an issue in a Preliminary Challenge shall not bar an Interested Party from raising that issue in a Formal Challenge, provided the Interested Party submitted a Preliminary Challenge during the Review Period with respect to one or more other issues. Failure to pursue an issue through a Preliminary Challenge or to lodge a Formal Challenge regarding any issue as to a given Annual Update shall bar pursuit of such issue with respect to that Annual Update, but shall not bar pursuit of such issue or the lodging of a Formal Challenge as to such issue as it relates to a subsequent Annual Update.

e. Any response by AMPT to a Formal Challenge must be submitted to the FERC within thirty (30) calendar days of the date of the filing of the Formal Challenge (or such later date as FERC may establish), and shall be served on the filing party(ies) and the PJM Exploder List on the date of such filing.

f. In any Formal Challenge proceeding concerning an Annual Update (including corrections), or Accounting Change(s), AMPT shall demonstrate the justness and reasonableness of the rate resulting from its application of the Formula Rate by demonstrating that it has correctly applied the terms of the Formula Rate consistent with these Protocols and that it



followed the applicable requirements and procedures in applying the Formula Rate. Nothing herein is intended to alter the burdens applied by FERC with respect to prudence challenges.

g. Except as specifically provided herein, nothing herein shall be deemed to limit in any way the right of AMPT to file unilaterally, pursuant to the FPA and the regulations thereunder, an application seeking changes to the Formula Rate or to any of the stated value inputs requiring a prior filing under these Protocols (including, but not limited to, the Margin Factor, and the scope of and amortization period for any deferred costs), or the right of any other party or the Commission to seek such changes pursuant to the FPA and the regulations thereunder.

#### **Section 6. Changes to Annual Updates**

If AMPT determines or concedes that corrections to the Annual Update are required, whether under Section 4 or 5 of these Protocols, including but not limited to those requiring corrections to its FERC Form No. 1 Document, or input data used for a Financial Year that would have affected the Annual Update for that Rate Year, such corrections shall be reflected as adjustments in the Annual Update for the next Rate Year, with interest calculated in accordance with the FERC Interest Rate (as determined pursuant to 18 C.F.R. § 35.19a). This reconciliation mechanism shall apply in lieu of mid-Rate Year adjustments.

## **ATTACHMENT 2**

**Attachment H-32A to the PJM OATT (AMPT  
Formula Rate Template)**

**and**

**Attachment H-32B to the PJM OATT (AMPT  
Formula Rate Implementation Protocols)  
(Clean)**

**Attachment H-32A to the PJM OATT  
(AMPT Formula Rate Template)  
(Clean)**

AMP Transmission LLC							
Calculation of Transmission Revenue Requirements							
Transmission Zone							
Cash-Flow Model							
Year Ended XX/XX/20							
Projected or Actual							
Line No.	Cost of Service Item	(Note A) Page, Line, Col.	Notes	Company Total	Allocator	Qualifying Transmission	
(a)	(b)	(c)	(d)	(e)	(f)	(g) (e) x (f) Allocated Amount	
1	GROSS REVENUE REQUIREMENT (line 54)					\$	-
2							
3							
4	REVENUE CREDITS	(Note C)		Total	Allocator		
5	Account No. 454	WP02		\$ -	TP 0.000%	\$	-
6	Account No. 456	WP02		\$ -	TP 0.000%	\$	-
7	Revenue Credits Specific to zone	WP02		\$ -	D/A 100.00%	\$	-
8	Reserved			\$ -	TP 0.000%	\$	-
9	Transmission Enhancement Credit	WP07		\$ -	TP 0.000%	\$	-
10	TOTAL REVENUE CREDITS (sum lines 5-9)					\$	-
11							
12	TRUE-UP ADJUSTMENT WITH INTEREST (Protocols)	(Note D) WP05				\$	-
13							
14	Adjustments to Net Revenue Requirement (Note G)					\$	-
15	Interest on Adjustments (Note H)					\$	-
16	Total Adjustment (line 14 + line 15)					\$	-
17	NET REVENUE REQUIREMENTS					\$	-
17a	DIVISOR						
17b	1 Coincident Peak (CP) (MW) - Enter Zone Name						- MW
17c	Annual Network Rate (\$/MW/Yr) (Line 17 / Line 17b)					\$	- MW/Yr
18							
19	O&M/A&G, DEBT SERVICE & OTHER TAXES						
20							
21	Transmission O&M allocable to zone	321.112.b and WP09	WP09	\$ -	TP 0.000%	\$	-
22	Transmission O&M Specific to zone (Note M)	Zone in title	WP09	\$ -	D/A 100.000	\$	-
23	Less Account 565	321.96.b	Form 1	\$ -	TP 0.000%	\$	-
24	Less: Account 561.2 Load Dispatch - Monitor and Operate Trans System through Schedule 1A	321.86.b	Form 1	\$ -	TP 0.000%	\$	-
25	A&G allocable to zone (Note M)	323.197.b and WP09	WP09	\$ -	W&S 100.000%	\$	-
26	A&G Specific to zone (Note M)		WP09	\$ -	W&S 100.000%	\$	-
27	Other Amortizations - _____ current Zone (Note N)		WP03	\$ -	D/A 100.000%	\$	-
28	Other Amortizations - _____ other Zone (Note N)		WP03	\$ -	N/A 0.000%	\$	-
29	Other Amortizations - All zones		WP03	\$ -	D/A 100.000%	\$	-
30	Amortization of Start-Up Costs to zone (Note N)		WP03	\$ -	D/A 100.000%	\$	-
31	TOTAL O&M (sum lines 21, 23, 25-28, less lines 23 and 24)					\$	-
32							
33	DEBT SERVICE						
34	Debt Service (Note L)		WP06	\$ -	TP 0.000%	\$	-
35	Amortization of premium or discount (Note E)			\$ -	TP 0.000%	\$	-
36	TOTAL DEBT SERVICE (Sum lines 34 and 35 )			\$ -		\$	-
37	Interest for Working Capital needs		WP06b	\$ -	TP 0.000%	\$	-
38							
39	TAXES OTHER THAN INCOME TAXES (Note F)						
40	LABOR RELATED						
41	Payroll	263.i	Form 1	\$ -	W&S 100.000%	\$	-
42	Highway and vehicle	263.i	Form 1	\$ -	W&S 100.000%	\$	-
43	PLANT RELATED	263.i					
44	Property specific to zone (Note M)	Reference zone	WP09	\$ -	D/A 100.000%	\$	-
45	Property allocable to zone (Note M)	263.i and WP09	WP09	\$ -	TP 0.000%	\$	-
46	Other	263.i	Form 1	\$ -	D/A 100.000%	\$	-
47	State Franchise Tax	263.i	Form 1	\$ -	D/A 100.000%	\$	-
48	TOTAL OTHER TAXES (sum lines 41 through 47)			\$ -		\$	-
49							
50	Subtotal (lines 31 + 36 + 37 + 48)			\$ -		\$	-
51		Margin factor					
52	MARGIN REQUIREMENT (Note I)(WP10)	40% of Debt Service	40.0%	\$ -	D/A 100.000%	\$	-
53							
54	REV. REQUIREMENT (sum lines 50 and 52)			\$ -		\$	-
55							
56	GROSS PLANT IN SERVICE						
57	Production			\$ -	NA		
58	Transmission (Note B)	207.58.g	WP01/04	\$ -	D/A 100.000%	\$	-
59	Distribution			\$ -	N/A 0.000%	\$	-
60	General & Intangible	205.5.g & 207.99.g	WP01	\$ -	W&S 100.000%	\$	-
61	Reserved			\$ -	TP 0.000%	\$	-
62	Other			\$ -	TP 0.000%	\$	-
63	TOTAL GROSS PLANT (sum lines 57 - 62)			\$ -		\$	-
64						\$	-
65	TRANSMISSION PLANT % INCLUDED IN PJM COST OF SERVICE					\$	-
66						\$	-
67	Total transmission plant		WP04			\$	-
68	Less Non-Qualifying Transmission Plant		WP04			\$	-
69	Less transmission plant included in OATT Ancillary Services		WP04			\$	-
70	Total Qualifying Transmission Plant in Service (line 67 - 68 - 69)					\$	-
71							
72	Percentage of PJM Qualifying transmission plant included in Cost of Service (line 70 / line 67)					TP=	0.000%

AMP Transmission LLC  
Calculation of Transmission Revenue Requirements  
Transmission Zone  
Cash-Flow Model  
Year Ended XX/XX/20  
Projected or Actual

Line No. (a)	Cost of Service Item (b)	(Note A) Page, Line, Col. (c)	Notes (d)	Company Total (e)	Allocator (f)	Qualifying Transmission (g) (e) x (f) Allocated Amount
73						
74	TRANSMISSION EXPENSES					
75						
76	Total transmission expenses (line 21+22 Column e)					\$ -
77	Less transmission expenses included in OATT Ancillary Services (Note J)					\$ -
78	Included transmission expenses (line 76 less line 77)					\$ -
79						
80	Percentage of transmission expenses after adjustment (line 78 divided by line 76)					0.000%
81	Percentage of transmission plant included in ISO Rates (line 72)				TP	0.000%
82	Percentage of transmission expenses included in ISO Rates (line 80 times line 81)				TE=	0.000%
83						
84						
85	WAGES & SALARY ALLOCATOR (W&S) (Note K)			\$	TP Allocation	
86	Production			\$ -	0.000%	\$ -
87	Transmission (WP04)			\$ 1	100.000%	\$ 1
88	Distribution			\$ -	0.000%	\$ -
89	Other			\$ -	0.000%	\$ -
90	Total (sum lines 86-89)			\$ 1	\$ 1	= 100.000% =WS
91						
92						
93						
94						
95						
96						
97						
98						
99	General Note:		References to pages in this formulary rate are indicated as: (page#, line#, col.)			
100			References to data from Informational FERC Form 1 are indicated as: #.y.x (page, line, column)			
101						
102	Notes:					
103	A		AMPT will maintain and post with informational filings an Informational FERC Form 1.			
104	B		Beginning/End year balances will match Form 1. 13-Month average balances shown on WP-01. Qualifying zonal transmission investment shown on WP04. Excluding any Transmission AROs			
105	C		The revenues credited on page 1 lines 5-9 shall include only the amounts received directly (in the case of grandfathered agreements) or from the ISO (for service under this tariff) reflecting the Transmission Owner's integrated transmission facilities. They do not include revenues associated with FERC annual charges, gross receipts taxes, ancillary services, facilities not included in this template (e.g., direct assignment facilities and GSUs) which are not recovered under this Rate Formula Template.			
106						
107						
108						
109	D		The True-Up adjustment is the difference between (1) the revenues received for the twelve month period and (2) the ATRR for that twelve month period after it is known, with interest			
110			Over Recoveries are entered as negative to reduce the net revenue. Under recoveries are entered as Positive to increase the net revenue.			
111	E		Includes amounts recorded to accounts 428 and 429.			
112	F		Includes only FICA, unemployment, highway, property, gross receipts, PILOT, and other assessments charged in the current year. Taxes related to income are excluded.			
113			Gross receipts taxes are not included in transmission revenue requirement in the Rate Formula Template, since they are recovered elsewhere.			
114	G		Adjustments required pursuant to Section 6 of the AMPT Protocols. Refunds shall be entered as a negative number to reduce the net revenue requirement.			
115			Surcharges shall be entered as a positive number to increase the net revenue requirement.			
116	H		Interest required pursuant to Section 2(c) of Protocols. Interest on any refunds shall be entered as a negative number to reduce the net revenue requirement. Interest on surcharge shall be entered as a positive number to increase the net revenue requirement.			
117						
118	I		Margin Factor equals .40 or 40% of debt service. Margin Requirement is the dollar amount that results from applying the Margin Factor to annual debt service.			
119			The Margin Factor can only be changed by Order of the Commission			
120	J		Removes dollar amount of transmission expenses included in the OATT ancillary services rates, including all of Account No. 561.1, 561.2,			
121			561.3 and 561.BA.			
122	K		AMPT will have no wages and salaries. However, all A&G expense incurred by AMPT will be 100% related to AMPT Transmission			
123	L		PTRR debt service projections for zone are shown on WP06. Actual ATRR debt service (for True-up template) will be from AMPT accounting records			
124	M		If ASTI zone, entry is WP09, line Col (d) for O&M and A&G			
125			If AEP zone, entry is WP09, line Col (d) for O&M and A&G			
126	N		Includes amortization of pre-commercial Start-Up costs booked in account 182.3, approved by the Commission and amortized through Account 566.			

# AMP Transmission LLC

Page 3 of 18

## Gross Plant in Service - 13 Month Average Balances

Attachment H-32A - WP01 - Plant  
Projected

<u>Line</u> <u>No.</u>	<u>Month</u>	<u>Year</u>	<u>Production</u>	<u>Transmission</u>	<u>Distribution</u>	<u>General</u>	<u>Intangible</u>	<u>Total</u>
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
		[A]	205.46.g	207.58.g	207.75.g	207.99.g	205.5.g	
1	Month 1	20XX						
2	Month 2	20XX						
3	Month 3	20XX						
4	Month 4	20XX						
5	Month 5	20XX						
6	Month 6	20XX						
7	Month 7	20XX						
8	Month 8	20XX						
9	Month 9	20XX						
10	Month 10	20XX						
11	Month 11	20XX						
12	Month 12	20XX						
13	Month 13	20XX						
14								
15	13-month							
16								
17								
18	<b>Asset Retirement Cost for Transmission Plant</b>			<b>Transmission</b>				
19								
20								
21			[A]	207.57.g				
22	Month 1	20XX		-				
23	Month 2	20XX		-				
24	Month 3	20XX		-				
25	Month 4	20XX		-				
26	Month 5	20XX		-				
27	Month 6	20XX		-				
28	Month 7	20XX		-				
29	Month 8	20XX		-				
30	Month 9	20XX		-				
31	Month 10	20XX		-				
32	Month 11	20XX		-				
33	Month 12	20XX		-				
34	Month 13	20XX		-				
35								
36	13-month Average			-				
37								
38	Notes:							
39	[A]	Reference for December balances as would be reported in FERC Form 1. Whether used in a PJM transmission zone with a						
40		calendar year or non-calendar year rate period, AMPT will always forecast and true-up to the calendar/financial year because						
41		the AMPT revenue requirement is ultimately determined using values reported by AMPT in the format of the FERC Form 1.						

**AMP Transmission  
LLC**  
Revenue Credits Workpaper

Attachment H-32A - WP02 - Revenue  
Credits

Page 4 of 18

**H-32A-WP02 - Revenue Credits**

Add Lines if needed

Line			
<u>No.</u>	<u>REVENUE CREDITS</u>	<u>Amount</u>	<u>Description of Revenue Credits</u>
(a)	(b)		(c) (d)
<u>ADD LINES AS NEEDED FOR ADDITIONAL REVENUE CREDITS</u>			
1	Account No. 454	\$	-
2	Account No. 454 Revenue Credits specific to zone	\$	-
3	Account No. 454 Revenue Credits allocable to all zones	\$	-
4			
5			
6			
7	Account No. 456	\$	-
8	Account No. 456 Revenue Credits specific to zone	\$	-
9	Account No. 456 Revenue Credits allocable to all zones	\$	-
10			
11			
12	Other Revenue Credits specific to zone	\$	-
13			
14			
15			

# AMP Transmission LLC

Formation Cost (Start-up) Workpaper

Attachment H-32A - WP03 - Start-Up Costs

Page 5 of 18

Add Columns and lines as needed

## AMP Transmission LLC 2018 Start-Up Costs

**3-year Amorts**  
Deferred from  
and Incurred in  
2018

Up Front Costs		
Legal :	\$	
Legal :	\$	
Legal :	\$	
Legal:	\$	
Legal :	\$	
Total Legal consultant	\$	
Travel, Meals	\$	
AMP Labor/Overhead consultant	\$	
PJM Application fee	\$	
Legal	\$	
Legal	\$	
Legal	\$	
Total Up-Front Costs	\$	
Number of anticipated Transmission Zones	2	ATSI and AEP East
Amortization period	3	years beginning 1/1/20XX
Yearly Amortization	\$	ATSI Zone
Deferred to AEP Zone (or Next Zone)	\$	AEP zone for future request at FERC

### Other Amortizations of deferred start-up – ATSI Zone Specific

	<u>Total</u>	<u>Term</u>	<u>Yearly Amortization</u>
Legal		1	
Consulting		1	
Consulting		1	Add lines as needed
PJM		1	
Consulting		1	
O&M Napoleon rest of 2018 estimate		1	
Travel/Meals/Insurance		1	
AMP Labor/Overhead		1	
Fourth quarter 2018 interest on Napoleon Loan		1	
legal		1	
Legal		1	
legal		1	
Total 1-year Amort to ATSI zone			

ADD LINES AND CATEGORIES AS NEEDED



**Other Amortizations - AEP**

Page 6 of 18

	<u>Total</u>	<u>term</u>	<u>Yearly Amortization</u>
List other AEP Amortizations here	\$ -	0	\$ -
List other AEP Amortizations here	\$ -	0	\$ -
List other AEP Amortizations here	\$ -	0	\$ -
List other AEP Amortizations here	\$ -	0	\$ -
List other AEP Amortizations here	\$ -	0	\$ -
List other AEP Amortizations here	\$ -	0	\$ -
List other AEP Amortizations here	\$ -	0	\$ -
Total AEP zonal Amortizations		\$	-

Add lines as needed

AMP Labor – Start-up amortization over 3 or 1 years.

**LABOR FOR SEPT\_DEC**

AMP Labor Hours	% Time	Hours	Expenses	
1		10%	52	3 months remaining
2		10%	52	
3		50%	260	
4		35%	182	
5		90%	468	
6		10%	52	
7		10%	52	
8		10%	52	
9		5%	26	
10		20%	104	
11		20%	104	
12		5%	26	
13		5%	26	
14		20%	104	
15		20%	104	
16		5%	26	Blended Rate

LABOR HOURS 1690 \$ 75.00

LABOR EXPENSES 41% \$

\$ Labor Overhead \$ Budget for Oct - Dec 2018

\$ Actuals thru September  
\$ Budget October - December based on AMP % allocation  
\$ Total

But, 3 vs 1 year split is thru August!

So, \$ - /9\*8 = actual thru August \$

Half goes to 3 year, half to 1 \$

Remainder goes to ATSI; \$

ADD LINES AND CATEGORIES AS NEEDED

# AMP Transmission LLC

## Zonal Investment Workpaper

Page 7 of 18

Add Zones if necessary. Add lines for more project investment

Line  
No.**AMPT Transmission Investment - Gross Plant**

(a)	(b)	(c)	(d)	(e)
	<u>ATS</u>	<u>AE</u>	<u>Other zone</u>	<u>AMPT Total</u>
City of Napoleon Assets	\$	\$ -	\$ -	\$
Non-Qualifying	\$ -	\$ -	\$ -	\$ -
Total Qualifying	\$	\$ -	\$ -	\$
	\$			
Zonal Allocation	100%	0%	0%	
Allocated To Zone	\$	\$	-	\$

**Transmission Plant recovered in Ancillary Services**

	<u>ATSI</u>	<u>AEP</u>	<u>Other Zone</u>	<u>AMPT Total</u>
Amount	\$ -	\$ -	\$ -	\$ -
Zone Allocation	0%	0%	0%	
Allocated to Zone	\$ -	\$ -	\$ -	\$ -

**Wages and Salaries Proxy – Gross Plant in Each Zone**

Line 12 (a, b, or c) divided by Line 12(e) 100.0% 0.0% 0.0%

**AMP Transmission  
LLC**  
True-Up and Adjustments Workpaper

Page 8a of 18

**AMPT True-up with Interest - based on Protocols**

NITS Revenues received by PJM for the Year (Note 2)	Actual Revenue Requirement For Year (ATRR)	True-up Adjustment - (Over)/Under Recovery
-	-	-

Over (Under) Recovery Plus Interest	Average Monthly Interest Rate Amortization	Months	Calculated Interest	Surcharge (Refund) Owed
Interest Rate on Amount of Refunds or Surcharges (Note 1)	0.3542%			

As an example, an over or under collection will be recovered prorata over 2019, held for 2020 and returned prorata over 2021

Calculation of Interest				Monthly	
January	Year 2019	-	0.3542%	12	-
February	Year 2019	-	0.3542%	11	-
March	Year 2019	-	0.3542%	10	-
April	Year 2019	-	0.3542%	9	-
May	Year 2019	-	0.3542%	8	-
June	Year 2019	-	0.3542%	7	-
July	Year 2019	-	0.3542%	6	-
August	Year 2019	-	0.3542%	5	-
September	Year 2019	-	0.3542%	4	-
October	Year 2019	-	0.3542%	3	-
November	Year 2019	-	0.3542%	2	-
December	Year 2019	-	0.3542%	1	-
					-

				Annual	
January through December	Year 2020	-	0.3542%	12	-

Over (Under) Recovery Plus Interest Amortized and Recovered Over 12 Months				Monthly	
January	Year 2021	-	0.3542%	-	-
February	Year 2021	-	0.3542%	-	-
March	Year 2021	-	0.3542%	-	-
April	Year 2021	-	0.3542%	-	-
May	Year 2021	-	0.3542%	-	-
June	Year 2021	-	0.3542%	-	-
July	Year 2021	-	0.3542%	-	-
August	Year 2021	-	0.3542%	-	-
September	Year 2021	-	0.3542%	-	-
October	Year 2021	-	0.3542%	-	-
November	Year 2021	-	0.3542%	-	-
December	Year 2021	-	0.3542%	-	-

True-Up with Interest	\$ -
Less Over (Under) Recovery	\$ -
Total Interest	\$ -

Note 1:  
Interest Rate on Amount of Refunds or Surcharges is the monthly average interest rate calculated in accordance with section 2(c) of the AMPT Formula Rate Protocols.

Note 2:  
Exclude any true-up amount included in the PTRR for the year being true-up

**AMP Transmission  
LLC**  
True-Up and Adjustments Workpaper

### AMPT True-up with Interest – under Non-Calendar Year Protocols

NITS Revenues received from PJM for the Rate Year (Note 2)	Actual Revenue Requirement For Financial Year (ATRR)	True-up Adjustment - (Over)/Under Recovery
\$ -	-	= \$

Over (Under) Recovery Plus Interest	Average Monthly Interest Rate Amortization	Months	Calculated Interest	Surcharge (Refund) Owed
Interest Rate on Amount of Refunds or Surcharges (Note 1)	0.3542%			

As an example, an over or under collection will be recovered prorata over Rate Year “n”, held for Rate Year “n+1” and returned prorata over Rate Year “n+2”

### Calculation of Interest

Calculation of Interest				Monthly	
Month 1	Rate Year "n"	-	0.3542%	-	-
Month 2	Rate Year "n"	-	0.3542%	-	-
Month 3	Rate Year "n"	-	0.3542%	-	-
Month 4	Rate Year "n"	-	0.3542%	-	-
Month 5	Rate Year "n"	-	0.3542%	-	-
Month 6	Rate Year "n"	-	0.3542%	-	-
Month 7	Rate Year "n"	-	0.3542%	-	-
Month 8	Rate Year "n"	-	0.3542%	-	-
Month 9	Rate Year "n"	-	0.3542%	-	-
Month 10	Rate Year "n"	-	0.3542%	-	-
Month 11	Rate Year "n"	-	0.3542%	-	-
Month 12	Rate Year "n"	-	0.3542%	-	-

				Annual
Month 1 through Month 12	Rate Year "n+1"	-	0.3542%	12

**Over (Under) Recovery Plus Interest Amortized and Recovered Over 12 Months**

<u>Over (Under) Recovery Plus Interest Amortized and Recovered Over 12 Months</u>				<u>Monthly</u>	
Month 1	Rate Year "n+2"	-	0.3542%	-	-
Month 2	Rate Year "n+2"	-	0.3542%	-	-
Month 3	Rate Year "n+2"	-	0.3542%	-	-
Month 4	Rate Year "n+2"	-	0.3542%	-	-
Month 5	Rate Year "n+2"	-	0.3542%	-	-
Month 6	Rate Year "n+2"	-	0.3542%	-	-
Month 7	Rate Year "n+2"	-	0.3542%	-	-
Month 8	Rate Year "n+2"	-	0.3542%	-	-
Month 9	Rate Year "n+2"	-	0.3542%	-	-
Month 10	Rate Year "n+2"	-	0.3542%	-	-
Month 11	Rate Year "n+2"	-	0.3542%	-	-
Month 12	Rate Year "n+2"	-	0.3542%	-	-

True-Up with Interest		\$	-
Less Over (Under) Recovery	\$	-	

Total Interest	\$
----------------	----

Note 1:  
Interest Rate on Amount of Refunds or Surcharges is the monthly average interest rate calculated in accordance with section 2(c) of the AMPT Formula Rate Protocols.

Note 2:  
Exclude any true-up amount included in the PTRR for the year being true-up

AMP Transmission LLC

Debt Service Workpaper - Annual

Projections  
Page 9 of 18

Debt Service Payments - Year End XX/XX/20XX

Rate Year	Total Projected	Actual Debt Service
20XX	\$0	\$0

for PTRR - to line 34 of Attachment H-32A

For ATRR and True-up, AMPT will record actual P&I in the year and those P&I entries will be populated in H-32A, page 1, line 36  
Add Additional Project Columns as needed

AMPT Projects											
	Project #1	Project #2	Project #3	Project #4	Project #5	Project #6	Project #7	Project #8	Project #9	Project #10	Total Projected
Project Name:											
Loan Principal:											
Less Acquisition Premium	\$0										\$0
Net Loan Principal											
Loan Term											
(Years): Loan											
Start Date:											
Loan End Date:											
Annual Interest											
Rate: Projected Yearly Debt Service											
Debt Service Schedule (Yearly)											
Year											
2019	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2023	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2024	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2025	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2026	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2027	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2028	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2029	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2030	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2031	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2032	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2033	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2034	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2035	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2036	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2037	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2038	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

AMP Transmission LLC

Debt Service Workpaper - Annual

Debt Service Payments - Year End XX/XX/20XX

Add Additional "Other" Columns as needed

Other AMPT Capitalized Equipment											
	Project #1	Project #2	Project #3	Project #4	Project #5 #5	Project #6 #6	Project #7 #7	Project #8 #8	Project #9 #9	Project #10 #10	Total Projected
Project Name:											
Loan Principal:											
Less Acquisition Premium											\$0
Net Loan Principal											
Loan Term											
(Years): Loan											
Start Date:											
Loan End Date:											
Annual Interest											
Rate: Projected Yearly Debt Service											
Debt Service Schedule (Yearly)											
Year											
2019	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2023	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2024	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2025	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2026	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2027	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2028	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2029	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2030	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2031	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2032	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2033	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2034	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2035	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2036	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2037	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2038	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

AMP Transmission LLC  
Debt Service Workpaper - Monthly

Debt Service Payments - Year EndXX/XX/20XX

This tab is to accommodate projects that may go in service or close mid-year in any particular month

Add Additional Project Columns and lines as needed

AMPT Projects			Project #1	Project #2	Project #3	Project #4	Project #5	Project #6	Project #7	Project #8	Project #9	Project #10
From WP06	Total Debt Service Over Loan Term		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
<u>Debt Service Schedule (Monthly)</u>												
Year	Month											
2019	1/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	2/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	3/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	4/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	5/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	6/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	7/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	8/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	9/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	10/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	11/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	12/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	1/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	2/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	3/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	4/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	5/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	6/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	7/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	8/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	9/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	10/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	11/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	12/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	1/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	2/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	3/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	4/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	5/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	6/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	7/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	8/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	9/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	10/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	11/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	12/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	1/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	2/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	3/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	4/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	5/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	6/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	7/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	8/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	9/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	10/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	11/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	12/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2023	1/1/2023		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

## AMP Transmission LLC

Debt Service Workpaper - Monthly

Page 12 of 18

## Debt Service Payments - Year EndXX/XX/20XX

Add Additional "Other" Columns and lines as needed

Other AMPT Capitalized Equipment			Project #1	Project #2	Project #3	Project #4	Project #5	Project #6	Project #7	Project #8	Project #9	Project #10
From WP06	Total Debt Service Over Loan Term		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
<b>Debt Service Schedule (Monthly)</b>												
Year	Month											
2019	1/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	2/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	3/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	4/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	5/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	6/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	7/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	8/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	9/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	10/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	11/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019	12/1/2019		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	1/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	2/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	3/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	4/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	5/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	6/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	7/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	8/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	9/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	10/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	11/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020	12/1/2020		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	1/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	2/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	3/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	4/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	5/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	6/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	7/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	8/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	9/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	10/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	11/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021	12/1/2021		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	1/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	2/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	3/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	4/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	5/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	6/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	7/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	8/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	9/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	10/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	11/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022	12/1/2022		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2023	1/1/2023		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0



**AMP Transmission LLC**  
Zonal Investment Workpaper

Line

	<u>No.</u>	<u>Components - Description</u>	
		Amounts	
(a)			(b)
(c)			
1	AMPT Working Capital Loan from AMP		\$
2			
3	Prime Rate		5.25%
4			
5	Interest on Working Capital Loan <sup>1</sup>		\$
6			
7			
8	For ATRR and True-up, AMPT will record actual interest expense		
9			
10	Note 1: to Attachment H-32A, page 1, line 37		
11			
12	For ATRR and True-up, interest will be per books		
13	For PTRR, use most recent available Prime Rate when projections are done		

**AMP Transmission LLC**  
**Transmission Enhancement Credit (Schedule 12**  
**Projects)** To be completed in conjunction with Attachment  
H-32A

Line No.	(1)	(2)	(3)	(4)
	<u>Reference</u>	<u>Transmission</u>	<u>Allocator</u>	
1	Gross Transmission Plant - Total	\$		
2	Net Transmission Plant - Total			
3				
4	O&M EXPENSE			
5	Total O&M Allocated to Transmission	\$		
6	Annual Allocation Factor for O&M	%		%
7				
8	DEBT SERVICE	\$		
9	Annual Allocation Factor for Debt Service	%		%
10				
11	MARGIN REQUIREMENT	\$		
12	Annual Allocation Factor for Margin Requirement	%		%
13				
14	TAXES OTHER THAN INCOME TAXES			
15	Total Other Taxes	\$	-	
16	Annual Allocation Factor for Other Taxes	0.00%		0.00%
17				
18	<b>Annual Allocation Factor for Expense and Margin Requirement</b>	<b>Sum of line 6 through 16</b>		<b>%</b>
19				
20				
21	<b>Add lines for projects as needed</b>			
22				
23		<b>Transmission Enhancement Credit (Schedule 2 Projects)</b>		
24		To be completed in conjunction with Attachment H-32A		
25				

Line No.	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
	Project Name	RTEP Project Number	Project Gross Plant	Annual Allocation Factor for Expense	Annual Expense Charge	Project Net Plant	Annual Allocation Factor for Return	Annual Return Charge	Project Depreciation Expense	True-up Adjustment	Annual Revenue Requirement with True-up
27				(line 18)	(Col. 3 * Col. 4)	N/A		(Col. 6 * Col. 7)		(WP08-True-up Col. i)	(Sum Col. 5, 8, 9 & 10)
28											
29											
30											
31											
32	1a	b	\$ -	128.15%	\$ -	N/A	0.00%	\$ -	\$ -	-	\$ -
33		b				N/A					
34	1b	b	\$ -	128.15%	\$ -	N/A	0.00%	\$ -	\$ -	-	\$ -
35											
36	1c		\$ -	128.15%	\$ -		0.00%	\$ -			\$ -
37											

2 Transmission Enhancement Credit for Attachment H-32A Page 1, Line 9

Notes

- A Gross Transmission Plant is that identified on page 2 line 2 of Attachment H-21A.  
B Net Transmission Plant is that identified on page 2 line 14 of Attachment H-21A.  
C Project Gross Plant is the total capital investment for the project calculated in the same method as the gross plant value in line 1 above. This value includes subsequent capital investments required to maintain the project in-service.  
D Project Net Plant is the Project Gross Plant Identified in Column 3 less the associated Accumulated Depreciation.  
E Project Depreciation Expense is the actual value booked for the project and included in the Depreciation Expense in Attachment H-21A page 3 line 12.

AMP Transmission LLC  
Transmission Enhancement Credit (Schedule 12 Projects)

Add more lines as needed

Transmission Enhancement Credit - True-up  
To be completed after WP07 for the True-up Year is updated using actual data

		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
Line No.		Project Name	RTEP Project Number	Actual TEC Revenues	Projected TEC Annual Revenue Requirement	Actual TEC Revenues Allocated to Projects	Actual TEC Annual Revenue Requirement	True-up Adjustment Principal Under/(Over)	Applicable Interest on Under/(Over)	True-up Adjustment with Interest Under/(Over)
					from PTRR	[Col. c, line 1 * (Col. d, line 2x / Col. d, line 3)]	from ATRR	Col. f - Col. e	Col. g * [(line 4a / line 4b) - 1]	Col. g + Col. H
1	[A]	Actual PJM TEC Revenues for True-up Year		-						
2a			b		-	-	-	-	-	-
2b			b		-	-	-	-	-	-
2c			b		-	-	-	-	-	-
3		Subtotal			-	-	-			
4a		Revenue Requirement True-up with Interest						-		
4b		Revenue Requirement True-up - Over/Under Recovery						-		

NOTE  
[A] Amount included in revenues reported on page 330, column k of FERC Form 1.

**AMP Transmission LLC**  
Transmission O&M, A&G, and Other Taxes Workpaper

Add lines and other zones as needed to increase transparency

**TRANSMISSION O&M, A&G, and OTHER TAXES DETAIL**

Add Lines and Columns to if necessary to increase transparency

Line No. (a)	Item (b)	Form 1 Reference (c)	Amount (d)	Deferred (e)	Description (f)
1	<b>Total Transmission O&amp;M – 20XX Projections</b>	321.112.b			From Informational AMPT Form 1 - ATRR True-up
2				Est. for Zone	
3	Total Transmission O&M Specific to ATSI zone	<u>Total</u>	<u>Alloc</u>	<u>ATSI</u>	<u>Projections</u>
4	consultant	\$0	35%	\$0	\$0 Transmission modeling and analysis services
5	consultant Implementation	\$0	100%	\$0	\$0 communications equipment
6	consultant Annual	\$0	100%	\$0	\$0 operational services for PJM communications and dispatch for transmission equip
7	consultant	\$0	35%	\$0	\$0 consulting services for equip evaluation for NERC BES compliance and Tariff eligibility
8	consultant	\$0	35%	\$0	\$0 Consultants
9	legal	\$0	50%	\$0	\$0 Legal
10	legal	\$0	100%	\$0	\$0 Legal
11	legal	\$0	100%	\$0	\$0 Legal
12	O&M Napoleon	\$0	100%	\$0	\$0 O&M on facilities
13	Meals/Travel	\$0	35%	\$0	\$0
14	Insurance	\$0	100%	\$0	\$0
15		\$0		\$0	\$0
16	List transmission specific to ATSI zone here - add rows if necessary	\$0		\$0	\$0
17		\$0		\$0	\$0 sum of transmission O&M specific to ATSI zone
18	Total Transmission O&M Specific to AEP zone				
19	List transmission specific to AEP zone here - add rows if necessary			\$ - \$ -	Add description
20	List transmission specific to AEP zone here - add rows if necessary			\$ - \$ -	Add description
21	List transmission specific to AEP zone here - add rows if necessary			\$ - \$ -	Add description
22	List transmission specific to AEP zone here - add rows if necessary			\$ - \$ -	Add description
23	List transmission specific to AEP zone here - add rows if necessary			\$ - \$ -	Add description
24				\$ - \$ -	sum of transmission O&M specific to AEP zone
25	Total Transmission O&M Specific to all zones				
26	List transmission specific to all zones here - add rows if necessary			\$ - \$ -	Add description
27	List transmission specific to all zones here - add rows if necessary			\$ - \$ -	Add description
28	List transmission specific to all zones here - add rows if necessary			\$ - \$ -	Add description
29	List transmission specific to all zones here - add rows if necessary			\$ - \$ -	Add description
30	List transmission specific to all zones here - add rows if necessary			\$ - \$ -	Add description
31				\$ - \$ -	sum of transmission O&M specific to all zones
32					

ADD LINES AND ZONES FOR DATA IN FUTURE AS NEEDED

**AMP Transmission LLC**  
Transmission O&M, A&G, and Other Taxes  
Workpaper

Page 17 of 18

Line No.	Item	Form 1 Reference	Amount	Deferred	Description
(a)	(b)	(c)	(d)	(e)	(f)
33	<b>A&amp;G Expense</b>		3:	\$ -	From Informational Form 1 for ATRR True-up, otherwise estimate for PTRR
34					
35	AMP Labor and Over				
36	AMP Labor and Overheads Allocable to the ASTI Zone		\$0	35%	\$ - \$ - AMP staff labor and overhead
37	List A&G specific to ATSI zone here - add rows if necessary		\$0		\$ - \$ - Add description
38	List A&G specific to ATSI zone here - add rows if necessary		\$0		\$ - \$ - Add description
39	List A&G specific to ATSI zone here - add rows if necessary		\$0		\$ - \$ - Add description
40	List A&G specific to ATSI zone here - add rows if necessary		\$0		\$ - \$ - Add description
41	List A&G specific to ATSI zone here - add rows if necessary		\$0		\$ - \$ - Add description
42			\$0		\$ - \$ - sum of A&G specific to ATSI zone
43	Total A&G Specific to AEP zone				
44	List A&G specific to AEP zone here - add rows if necessary				\$ - \$ - Add description
45	List A&G specific to AEP zone here - add rows if necessary				\$ - \$ - Add description
46	List A&G specific to AEP zone here - add rows if necessary				\$ - \$ - Add description
47	List A&G specific to AEP zone here - add rows if necessary				\$ - \$ - Add description
48	List A&G specific to AEP zone here - add rows if necessary				\$ - \$ - Add description
49					\$ - \$ - sum of A&G specific to AEP zone
50	Total A&G Specific to all zones				
51	List A&G specific to all zones here - add rows if necessary				\$ - \$ - Add description
52	List A&G specific to all zones here - add rows if necessary				\$ - \$ - Add description
53	List A&G specific to all zones here - add rows if necessary				\$ - \$ - Add description
54	List A&G specific to all zones here - add rows if necessary				\$ - \$ - Add description
55	List A&G specific to all zones here - add rows if necessary				\$ - \$ - Add description
56	Total A&G Specific to all zones				\$ - \$ - sum of A&G specific to all zones
57					
58					
59	<b>Other Taxes</b>	263.i		\$ -	From Informational Form 1 for ATRR True-up, otherwise estimate for PTRR
60					
61	Other Taxes specific to ATSI Zone				
62	Other Tax specific to ATSI zone here - add rows if necessary				\$ - \$ - Add description
63	Other Tax specific to ATSI zone here - add rows if necessary				\$ - \$ - Add description
64	Other Tax specific to ATSI zone here - add rows if necessary				\$ - \$ - Add description
65	Other Tax specific to ATSI zone here - add rows if necessary				\$ - \$ - Add description
66	Other Tax specific to ATSI zone here - add rows if necessary				\$ - \$ - Add description
67	Other Tax specific to ATSI zone here - add rows if necessary				\$ - \$ - Add description
68					\$ - \$ - sum of Other Taxes specific to ATSI zone
69	Other Taxes specific to AEP Zone				
70	Other Tax specific to AEP zone here - add rows if necessary				\$ - \$ - Add description
71	Other Tax specific to AEP zone here - add rows if necessary				\$ - \$ - Add description
72	Other Tax specific to AEP zone here - add rows if necessary				\$ - \$ - Add description
73	Other Tax specific to AEP zone here - add rows if necessary				\$ - \$ - Add description
74	Other Tax specific to AEP zone here - add rows if necessary				\$ - \$ - Add description
75					\$ - \$ - sum of Other Taxes specific to AEP zone
76	Other Taxes Specific to all zones				
77	Other Tax specific to all zones here - add rows if necessary				\$ - \$ - Add description
78	Other Tax specific to all zones here - add rows if necessary				\$ - \$ - Add description
79	Other Tax specific to all zones here - add rows if necessary				\$ - \$ - Add description
80	Other Tax specific to all zones here - add rows if necessary				\$ - \$ - Add description
81	Other Tax specific to all zones here - add rows if necessary				\$ - \$ - Add description
82	Total Other Taxes Specific to all zones				\$ - \$ - sum of Other Taxes specific to all zones

## **AMP Transmission LLC**

### **Development of Margin Requirement**

Line No.	Item	12-Month Period=	20XX
(a)	(b)		(c)
1	Debt Service Payments <sup>1</sup>		\$ -
2			
3	Less:		
4	Interest on Working Capital Loans (WP06b)		\$ -
5	Premium paid on Debt and included in debt service		\$ -
6	Other Adjustments needed to reflect only Debt Service on Assets		\$ -
7	Add Additional deductions to Debt Service Payments as needed		\$ -
8			
9	Net Debt Service Payments (line 1 - lines 4 through 7)		\$ -
10	Margin Factor (fixed)		40%
11	Margin Requirement (line 9 x line 10) - To H-32A line		\$ -
12			
13	Notes:		
14	1. Excludes any Debt Service related to Acquisition Adjustments if any per WP06		

**Attachment H-32B to the PJM OATT  
(AMPT Formula Rate Implementation Protocols)  
(Clean)**

## **ATTACHMENT H-32B**

### **AMP Transmission, LLC Formula Rate Implementation Protocols**

#### **ATTACHMENT H-32B-1**

#### **ANNUAL TRUE-UP, INFORMATION EXCHANGE, AND CHALLENGE PROCEDURES (CALENDAR YEAR BASIS)**

The Formula Rate Template (“Template”) (Attachment H-32A), and these Formula Rate Implementation Protocols (“Protocols”) together comprise the Formula Rate of AMP Transmission, LLC (“AMPT”) for transmission revenue requirement determinations under the PJM Interconnection, LLC (“PJM”) Open Access Transmission Tariff (“PJM Tariff”).<sup>1/</sup> AMPT shall follow the instructions specified in the Formula Rate to calculate its Transmission Revenue Requirement, initially on a projected basis (the Projected Transmission Revenue Requirement), and, when actual data are available, on an actual basis (the Actual Transmission Revenue Requirement), utilizing its Formula Rate Template for such calculations. The Projected Transmission Revenue Requirement and the Actual Transmission Revenue Requirement each shall be determined for January 1 to December 31 of a given calendar year (the “Rate Year”). The Formula Rate shall become effective for recovery of AMPT’s Transmission Revenue Requirement upon the effective date for incorporation into the PJM Tariff through a filing by PJM and AMPT with the Federal Energy Regulatory Commission (“FERC” or “Commission”) under the Federal Power Act (“FPA”), 16 U.S.C. § 824d.

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<sup>1/</sup> These protocols shall be applied to AMPT’s transmission revenue requirement determinations in PJM Zones in which all other Transmission Owners calculate their transmission revenue requirements on a calendar year basis.



## **Section 1. Annual Projection**

- a. No later than October 31 preceding a Rate Year, and each subsequent Rate Year, AMPT shall determine its Projected Transmission Revenue Requirement (“PTRR”) for the upcoming Rate Year in accordance with the Formula Rate, which shall include the True-Up Adjustment described and defined in Section 2 below, if applicable (the PTRR and any applicable True-Up Adjustment together comprising the “Annual Projection”). AMPT shall cause an electronic version of the Annual Projection to be posted in both a Portable Document Format (“PDF”) and fully-functioning Excel file at a publicly accessible location on PJM’s internet website and OASIS. The date on which the posting occurs shall be that year’s “Annual Projection Publication Date.”
- b. The posting of the Annual Projection shall:
  - (i) Provide the Formula Rate calculations and all inputs thereto, as well as supporting documentation and workpapers for data that are used in the Annual Projection;
  - (ii) Include all inputs in sufficient detail to identify the components of AMPT’s Annual Projection, explanations of the bases for the projections and input data, and sufficient detail and explanation to enable Interested Parties <sup>2/</sup> to replicate the calculation of the Annual Projection;

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<sup>2/</sup> As used in these Protocols, “Interested Parties” shall include but not be limited to: (i) any Eligible Customer under the PJM Tariff; (ii) any regulatory agency with rate jurisdiction over a public utility located within the PJM footprint; (iii) any consumer advocate authorized by state law to review and contest the rates for any such public utility; and (iv) any party with standing under FPA section 205 or section 206.

(iii) With respect to any Accounting Changes (as that term is defined in Section 3.e.iii.A):

- A. Identify any Accounting Changes including:
  - i. The initial implementation of an accounting standard or policy;
  - ii. The initial implementation of accounting practices for unusual or unconventional items where FERC has not provided specific accounting direction;
  - iii. Correction of errors and prior period adjustments that impact the Annual Projection calculation; and
  - iv. The implementation of new estimation methods or policies that change prior estimates.
- B. Identify items included in the Annual Projection at an amount other than on a historic cost basis (*e.g.*, fair value adjustments);
- C. Identify any reorganization or merger transaction during the previous year and explain the effect of the accounting for such transaction(s) on inputs to the Annual Projection; and
- D. Provide, for each item identified pursuant to Sections 1.b.iii.A through 1.b.iii.C of these Protocols, a narrative explanation of the individual impact of such changes on the Annual Projection.

- (iv) Include the following information related to affiliate cost allocation:
  - A. A detailed description of the methodologies used to allocate and directly assign costs between AMPT and its affiliates by service category or function, including any changes to such cost allocation methodologies from the prior year, and the reasons for those changes; and
  - B. The magnitude of such costs that have been allocated or directly assigned between AMPT and each affiliate by service category or function.
- c. If the date for making the posting of the Annual Projection should fall on a weekend or a holiday recognized by FERC, then the posting shall be made no later than the next business day.<sup>3/</sup> Within five (5) calendar days of the posting, PJM shall provide notice of such posting via the PJM Members Committee email subscription (“PJM Exploder List”). Interested Parties can subscribe to the PJM Exploder List on the PJM website.
- d. Together with the posting of the Annual Projection, AMPT shall cause to be posted on the PJM internet website and OASIS, and distributed to the PJM Exploder List, the time, date, location, and remote-access information for a stakeholder meeting with Interested Parties in order for AMPT to explain its Annual Projection and to provide Interested Parties an opportunity to seek information and clarifications regarding the Annual Projection (“Annual Projection Meeting”). The Annual Projection Meeting shall be held no fewer

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<sup>3/</sup> For the purposes of these Protocols, if any deadline included in these Protocols should fall on a weekend or a holiday recognized by FERC, then the deadline shall be extended to no later than the next business day.

than twenty (20) business days and no more than thirty (30) business days after the posting of the Annual Projection. Notice of the Annual Projection Meeting shall be provided via the PJM Exploder List no fewer than seven (7) calendar days prior to the meeting. AMPT will provide remote access to the Annual Projection Meeting in order to ease burdens (e.g., travel costs) to ensure all Interested Parties have the opportunity to participate.

- e. To the extent AMPT agrees to make changes in the Annual Projection for a given Rate Year, such revised Annual Projection shall be promptly posted at a publicly accessible location on PJM's internet website and OASIS, and e-mailed to the PJM Exploder List. Changes posted prior to November 30 preceding the Rate Year, or the next business day if November 30 is not a business day (or such later date as can be accommodated under PJM's billing practices), shall be reflected in the Annual Projection for the Rate Year; changes posted after that date will be reflected, as appropriate, in the True-Up Adjustment for the Rate Year.
- f. The PTRR, including the True-Up Adjustment, for each Rate Year shall be subject to review, challenge, true-up, and refunds or surcharges with interest, to the extent and in the manner provided in these Protocols.

## **Section 2. True-Up Adjustment**

- a. Using data included in its informational FERC Form No. 1 Document<sup>4/</sup> for the preceding calendar year, AMPT will calculate the amount of under- or over-collection of its Actual Transmission Revenue Requirement ("ATRR") during the preceding Rate Year ("True-

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<sup>4/</sup> Although AMPT is not required to file a FERC Form 1, it will include in its Annual Update and file with the Commission on an informational basis each year a document (the "FERC Form 1 Document") that presents its financial and operating data for the previous year in the format of, and in accordance with the instructions to, the FERC Form 1.

Up Adjustment”). The True-Up Adjustment shall be the sum of the True-Up Adjustment Over/Under Recovery as determined in Section 2(b) and the Interest on the True-Up Adjustment Over/Under Recovery as determined in Section 2(c).

- b. The amount collected as AMPT’s transmission revenue requirement during the preceding calendar year will be compared to AMPT’s ATRR for the preceding Rate Year calculated in accordance with AMPT’s Formula Rate and based upon (i) AMPT’s informational FERC Form No. 1 Document for that same Rate Year, (ii) any FERC orders specifically applicable to AMPT’s calculation of its Transmission Revenue Requirement, (iii) the books and records of AMPT, which shall be maintained consistent with the FERC Uniform System of Accounts (“USofA”), (iv) FERC accounting policies and practices applicable to the calculation of annual revenue requirements under formula rates, and (v) any aspects of the PJM Tariff Governing Documents<sup>5/</sup> that apply to the calculation of annual revenue requirements under individual transmission owner formula rates, to determine any over- or under-recovery (“True-Up Adjustment Over/Under Recovery”).
- c. Interest on any True-Up Adjustment Over/Under Recovery shall be calculated for the thirty-six (36) months during which the over or under recovery in the revenue requirement remains outstanding (*i.e.*, from January 1 of the Rate Year being trued-up through December 31 of the year in which the True-Up Adjustment Over/Under recovery is credited or collected). The interest rate to be applied to the True-Up Adjustment Over/Under Recovery amounts will be determined using the average monthly FERC

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<sup>5/</sup> “PJM Tariff Governing Documents” include the PJM Tariff, Bylaws, Criteria, and Membership Agreements.

Interest Rate (as determined pursuant to 18 C.F.R. § 35.19a) for the twenty (20) months from the beginning of the Rate Year being trued-up through August 31 of the following year.

### **Section 3. Annual Update**

- a. On or before June 1 of the year following each Rate Year, AMPT shall calculate its ATRR and the True-Up Adjustment as described in Section 2 (the ATRR and the True-Up Adjustment together comprising the “Annual Update”) for such Rate Year and, together with such other information described in this Section 3, shall cause such Annual Update to be posted, in both a PDF and fully-functioning Excel format, at a publicly accessible location on PJM’s internet website and OASIS. Within five (5) calendar days of such posting, PJM shall provide notice of such posting via the PJM Exploder List.
- b. If the date for making the Annual Update posting should fall on a weekend or a holiday recognized by the FERC, then the posting shall be due on the next business day.
- c. The date on which the posting occurs shall be that year’s “Annual Update Publication Date.”
- d. Together with the posting of the Annual Update, AMPT shall cause to be posted on the PJM website and OASIS the time, date, location, and remote-access information for a stakeholder meeting with Interested Parties in order for AMPT to explain its Annual Update and to provide Interested Parties an opportunity to seek information and clarifications regarding the Annual Update (“Annual Update Meeting”). The Annual Update Meeting shall be held between a date that is not sooner than twenty (20) business days after the Annual Update Publication Date and September 1, provided that notice of the Annual Update Meeting shall be given via the PJM Exploder List no fewer than seven

(7) calendar days prior to the meeting. AMPT will provide remote access to the Annual Update Meeting in order to ease burdens (*e.g.*, travel costs) to ensure all Interested Parties have the opportunity to participate.

e. The Annual Update posting for the Rate Year:

- (i) Shall provide, via the Formula Rate worksheets, sufficiently detailed supporting documentation for data (and all adjustments thereto or allocations thereof) used in the Formula Rate that are not stated in the FERC Form No. 1 Document;<sup>6/</sup>
- (ii) Shall provide sufficient detail and sufficient explanation to enable Interested Parties to replicate the calculation of the Annual Update results from the FERC Form No. 1 Document and verify that each input to the Template is consistent with the requirements of the Formula Rate;
- (iii) Shall identify:
  - A. Any change in accounting that affects inputs to the Template or the resulting charges billed under the Formula Rate (“Accounting Change”), including:
    - i. The initial implementation of an accounting standard or policy;

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<sup>6/</sup> It is the intent of the Formula Rate, including the supporting explanations and allocations described therein, that each input to the Formula Rate for purposes of determining the actual Net Revenue Requirement for a given Rate Year will be either taken directly from the FERC Form No. 1 Document or reconcilable to the FERC Form No. 1 Document by the application of clearly identified and supported information. If the Form No. 1 is superseded, the successor form(s) shall be utilized and supplemented as necessary to provide equivalent information as that provided in the Form No. 1. If the FERC Form No. 1 is discontinued, equivalent information as that provided in the FERC Form No. 1 shall be utilized.

- ii. The initial implementation of accounting practices for unusual or unconventional items where FERC has not provided specific accounting direction;
    - iii. Correction of errors and prior period adjustments that impact the True-Up Adjustment calculation; and
    - iv. The implementation of new estimation methods or policies that change prior estimates.
  - B. Any items included in the Annual Update at an amount other than on a historic cost basis (*e.g.*, fair value adjustments);
  - C. Any reorganization or merger transaction during the previous year and an explanation of the effect of the accounting for such transaction(s) on inputs to the Annual Update; and
  - D. For each item identified pursuant to Sections 3.e.iii.A – C of these Protocols, the individual impact (in narrative format) of such changes on the Annual Update;
- (iv) Shall be subject to review and challenge in accordance with the procedures set forth in Sections 4, 5, and 6 of these Protocols;
  - (v) Shall be subject to review and challenge in accordance with the procedures set forth in these Protocols with respect to the prudence of any costs and expenditures included for recovery in the Annual Update; provided,



however, that nothing in these Protocols is intended to modify the Commission's applicable precedent with respect to the burden of going forward or burden of proof under formula rates in such prudence challenges; and

- (vi) Shall not seek to modify the Formula Rate and shall not be subject to challenge by any Interested Party seeking to modify the Formula Rate (*i.e.*, any modifications to the Formula Rate will require, as applicable, appropriate FPA filings or the initiation of an FPA investigation).

- f. The following Formula Rate inputs shall be stated values to be used in the Formula Rate until changed pursuant to a filing with the Commission requesting such change:
  - (i) Margin Factor; (ii) costs subject to deferred cost recovery; and (iii) amortization period over which deferred costs are recovered.

- g. **Example – Timelines for 2019 Annual Projection and 2020 Annual Update:**

On or before October 31, 2018, AMPT will determine the PTRR for the 2019 Rate Year. AMPT will post the Annual Projection for the 2019 Rate Year in accordance with Section 1 above. On or before June 1, 2020, AMPT will post its Annual Update, consisting of the ATRR and True-Up Adjustment for the 2019 Rate Year determined pursuant to Section 2 above. Such True-Up Adjustment will be reflected in the Annual Projection of AMPT's Transmission Revenue Requirement for the 2021 Rate Year posted on or before October 31, 2020.

#### **Section 4. Annual Review Procedures**

Each Annual Update and Annual Projection shall be subject to the following review procedures ("Annual Review Procedures"):

- a. Interested Parties shall have up to the later of two-hundred-ten (210) calendar days after the applicable Publication Date, or thirty (30) calendar days after the receipt of all responses to timely submitted information requests (unless such period is extended with the written consent of AMPT or by FERC order) (“Review Period”), to review the calculations and to notify AMPT in writing of any specific challenges to the Annual Update or Annual Projection (“Preliminary Challenge”), including challenges related to Accounting Changes. An Interested Party submitting a Preliminary Challenge must specify the inputs, supporting explanations, allocations, calculations, or other information to which it objects, and provide an appropriate explanation and documents to support its challenge. AMPT shall cause to be posted all Preliminary Challenges at a publicly accessible location on PJM’s internet website and OASIS, and a link to the website will be e-mailed to the PJM Exploder List.
- b. In the event of a Preliminary Challenge, AMPT will appoint a senior representative to work with the Interested Party (or its representatives) toward a resolution of the dispute.
- c. AMPT shall respond in writing to a Preliminary Challenge within twenty (20) business days of receipt, and its response shall notify the challenging party of the extent to which AMPT agrees or disagrees with the challenge. If AMPT disagrees with the Preliminary Challenge, it will provide the Interested Party with an explanation supporting the challenged inputs, explanations, allocations, calculations, or other information. AMPT shall promptly cause to be posted its responses to all Preliminary Challenges at a publicly accessible location on PJM’s internet website and OASIS, and a link to the website will be e-mailed to the PJM Exploder List. Notwithstanding the foregoing, Preliminary Challenges and responses to Preliminary Challenges that include material deemed by

AMPT to be confidential information will not be publicly posted but will be made available to requesting parties pursuant to a confidentiality agreement to be executed by AMPT and the requesting party.

- d. AMPT shall respond to all Preliminary Challenges submitted during the Review Period by no later than thirty (30) calendar days after the end of the Review Period.
- e. Interested Parties shall have up to one-hundred-fifty (150) calendar days after each annual Publication Date (unless such period is extended with the written consent of AMPT or by FERC order) to serve reasonable information requests on AMPT (“Discovery Period”).
- f. Information requests shall be limited to what is necessary to determine: (i) the extent, effect, or impact of an Accounting Change; (ii) whether the Annual Update or Annual Projection fails to include data properly recorded in accordance with the Protocols; (iii) the proper application of the Template and procedures in the Protocols; (iv) the accuracy of data and consistency with the Formula Rate of the charges shown in the Annual Update or Annual Projection; (v) the prudence of the actual costs and expenditures, including procurement methods and cost control methodologies; (vi) the effect of any change to the underlying USofA or FERC Form No. 1 Document; and (vii) any other information that may reasonably have substantive effect on the calculation of the charge pursuant to the Formula Rate. The information requests shall not otherwise be directed to ascertaining whether the Formula Rate is just and reasonable. Information requests shall not solicit information concerning costs or allocations where the costs or allocation methods have been determined to be appropriate by FERC in the context of prior AMPT Annual Updates, except that such information requests shall be permitted if

they (i) seek to determine if there has been a change in circumstances, (ii) are in connection with corrections pursuant to Section 6 of these Protocols, or (iii) relate to costs or allocations that have not previously been challenged and adjudicated by FERC.

- g. AMPT shall make a good faith effort to respond to reasonable information requests pertaining to the Annual Update or Annual Projection within fifteen (15) business days of receipt of such requests. AMPT shall respond to all reasonable information requests no later than thirty (30) calendar days after the end of the Discovery Period. AMPT will cause to be posted on the PJM website and OASIS all information requests from Interested Parties and AMPT's response(s) to such requests, and a link to the website will be e-mailed to the PJM Exploder List. Notwithstanding the foregoing, information and document requests and responses to information and document requests that include material deemed by AMPT to be confidential information will not be publicly posted but will be made available to requesting parties pursuant to a confidentiality agreement to be executed by AMPT and the requesting party. Voluminous materials will be made available at a physical AMPT site.
- h. AMPT shall not claim that responses to information and document requests provided pursuant to these Protocols are subject to any settlement privilege in any subsequent FERC proceeding addressing AMPT's Annual Update or Annual Projection.
- i. To the extent AMPT and any Interested Party(ies) are unable to resolve disputes related to information requests submitted in accordance with these Annual Review Procedures, AMPT or the Interested Party may petition the FERC to appoint an Administrative Law Judge as a discovery master to resolve the discovery dispute(s) in accordance with these Protocols and consistent with the FERC's discovery rules.

- j. Preliminary Challenges or Formal Challenges (as described in Sections 4 and 5) related to Accounting Changes shall be treated in the same manner under these Protocols as other challenges to the Annual Update or Annual Projection. Failure to make a Preliminary Challenge with respect to an Accounting Change in an Annual Update or Annual Projection shall not act as a bar with respect to a Formal Challenge with respect to that Annual Update or Annual Projection provided that the Interested Party submitted a Preliminary Challenge with respect to one or more other issues. Nor shall such failure bar a subsequent Preliminary Challenge related to a subsequent Annual Update or Annual Projection to the extent such Accounting Change affects the subsequent Annual Update or Annual Projection.
- k. If a change made by AMPT to its accounting policies, practices, or procedures, or the application of the Formula Rate, is found by the FERC to be unjust, unreasonable, or unduly discriminatory or preferential, then the calculation of the charges to be assessed during the Rate Year then under review, and the charges to be assessed during any subsequent Rate Years, including any True-up Adjustments, shall not include such change, but shall include any remedy that may be prescribed by FERC in the exercise of its discretion as of the effective date of such remedy, to ensure that the Formula Rate continues to operate in a manner that is just, reasonable, and not unduly discriminatory or preferential.

## **Section 5. Resolution of Challenges**

- a. Interested Parties shall have up to two-hundred-seventy (270) days following the applicable Publication Date (unless such period is extended with the written consent of AMPT or by FERC order), to file a challenge with the FERC (“Formal Challenge”). Such

Formal Challenge shall be submitted in the same docket as the AMPT informational filing and shall be served on AMPT by electronic service on the date of such filing in accordance with Section 385.2010(f)(3) of the Commission's regulations. Subject to any applicable confidentiality and Critical Energy Infrastructure Information restrictions, all information and correspondence produced by AMPT pursuant to these Protocols may be included in any Formal Challenge or other FERC proceeding relating to the Formula Rate.

b. Formal Challenges are to be filed pursuant to these Protocols, rather than under Rule 206, and shall:

- (i) Clearly identify the action or inaction which is alleged to violate the Formula Rate Template or Protocols;
- (ii) Explain how the action or inaction violates the filed rate Template or Protocols;
- (iii) Set forth the business, commercial, economic or other issues presented by the action or inaction as such relate to or affect the party filing the Formal Challenge, including
  - A. The extent or effect of an Accounting Change;
  - B. Whether the Annual Update or Annual Projection fails to include data properly recorded in accordance with these Protocols;
  - C. The proper application of the Template and procedures in these Protocols;

- D. The accuracy of the data and consistency with the Formula Rate of the charges shown in the Annual Update or Annual Projection;
  - E. The prudence of actual costs and expenditures;
  - F. The effect of any change to the underlying USofA or the FERC Form No. 1 Document; or
  - G. Any other information that may reasonably have substantive effect on the calculation of the charge pursuant to the Formula Rate.
- (iv) Make a good faith effort to quantify the financial impact or burden (if any) created for the party filing the Formal Challenge as a result of the action or inaction;
  - (v) State whether the issues presented are pending in an existing Commission proceeding or a proceeding in any other forum in which the filing party is a party, and if so, provide an explanation why timely resolution cannot be achieved in that forum;
  - (vi) State the specific relief or remedy requested, including any request for stay or extension of time, and the basis for that relief;
  - (vii) Include all documents that support the facts in the Formal Challenge in possession of, or otherwise attainable by, the filing party, including, but not limited to, contracts and affidavits; and

- (viii) State whether the filing party utilized the Preliminary Challenge procedures described in these Protocols to dispute the action or inaction raised by the Formal Challenge, and, if not, describe why not.
- c. Preliminary and Formal Challenges shall be limited to issues that may be necessary to determine: (i) the extent or effect of an Accounting Change; (ii) whether the Annual Update or Annual Projection fails to include data properly recorded in accordance with these Protocols; (iii) the proper application of the Formula Rate and procedures in these Protocols; (iv) the accuracy of data and consistency with the Formula Rate of the calculations shown in the Annual Update and Annual Projection; (v) the prudence of actual costs and expenditures; (vi) the effect of any change to the underlying USofA or FERC Form No. 1 Document; or (vii) any other information that may reasonably have substantive effect on the calculation of the charge pursuant to the Formula Rate.
- d. Failure to raise an issue in a Preliminary Challenge shall not bar an Interested Party from raising that issue in a Formal Challenge, provided the Interested Party submitted a Preliminary Challenge during the Review Period with respect to one or more other issues. Failure to pursue an issue through a Preliminary Challenge or to lodge a Formal Challenge regarding any issue as to a given Annual Update shall bar pursuit of such issue with respect to that Annual Update, but shall not bar pursuit of such issue or the lodging of a Formal Challenge as to such issue as it relates to a subsequent Annual Update.
- e. Any response by AMPT to a Formal Challenge must be submitted to the FERC within thirty (30) calendar days of the date of the filing of the Formal Challenge (or such later date as FERC may establish), and shall be served on the filing party(ies) and the PJM Exploder List on the date of such filing.



- f. In any Formal Challenge proceeding concerning an Annual Update (including corrections), Annual Projection, or Accounting Change(s), AMPT shall demonstrate the justness and reasonableness of the rate resulting from its application of the Formula Rate by demonstrating that it has correctly applied the terms of the Formula Rate consistent with these Protocols and that it followed the applicable requirements and procedures in applying the Formula Rate. Nothing herein is intended to alter the burdens applied by FERC with respect to prudence challenges.
- g. Except as specifically provided herein, nothing herein shall be deemed to limit in any way the right of AMPT to file unilaterally, pursuant to the FPA and the regulations thereunder, an application seeking changes to the Formula Rate or to any of the stated value inputs requiring a prior filing under these Protocols (including, but not limited to, the Margin Factor, and the scope of and amortization period for any deferred costs), or the right of any other party or the Commission to seek such changes pursuant to the FPA and the regulations thereunder.

#### **Section 6. Changes to Annual Updates**

If AMPT determines or concedes that corrections to the Annual Update are required, whether under Section 4 or 5 of these Protocols, including but not limited to those requiring corrections to its FERC Form No. 1 Document, or input data used for a Rate Year that would have affected the Annual Update for that Rate Year, such corrections shall be reflected as adjustments in the Annual Update for the next Rate Year, with interest calculated in accordance with the FERC Interest Rate (as determined pursuant to 18 C.F.R. § 35.19a). This reconciliation mechanism shall apply in lieu of mid-Rate Year adjustments.

## **ATTACHMENT H-32B**

### **AMP Transmission, LLC Formula Rate Implementation Protocols**

#### **ATTACHMENT H-32B-2**

#### **ANNUAL TRUE-UP, INFORMATION EXCHANGE, AND CHALLENGE PROCEDURES (NON-CALENDAR YEAR BILLING ZONES)**

The Formula Rate Template (“Template”) (Attachment H-32A), and these Formula Rate Implementation Protocols for Non-Calendar Year Billing Zones (“Protocols”) together comprise the Formula Rate of AMP Transmission, LLC (“AMPT”) for transmission revenue requirement determinations under the PJM Interconnection, LLC (“PJM”) Open Access Transmission Tariff (“PJM Tariff”) in zones in which billing is performed on other than a calendar year basis. For transmission zones in which billing is performed on a calendar year basis, the protocols set forth in Attachment H-32B-1 shall apply.

AMPT shall follow the instructions specified in the Formula Rate to calculate its Transmission Revenue Requirement, initially on a projected basis (the Projected Transmission Revenue Requirement), and, when actual data are available, on an actual basis (the Actual Transmission Revenue Requirement), utilizing its Formula Rate Template for such calculations. The Projected Transmission Revenue Requirement (“PTRR”) and the Actual Transmission Revenue Requirement (“ATRR”) each shall be determined for January 1 to December 31 of a given calendar year (the “Financial Year”). The PTRR will be recovered through charges to customers assessed during the twelve-month billing period used in the zone (the “Rate Year”). For purposes of clarity, a given Financial Year may be referred to in these Protocols as “Financial Year n” and the Rate Year in which the PTRR for Financial Year n is recovered may be referred to as “Rate Year n.” The Formula Rate shall become effective for recovery of

AMPT's Transmission Revenue Requirement upon the effective date for incorporation into the PJM Tariff through a filing by PJM and AMPT with the Federal Energy Regulatory Commission ("FERC" or "Commission") under the Federal Power Act ("FPA"), 16 U.S.C. § 824d.

**Section 1. Annual Projection**

a. No later than sixty (60) days before the start of a Rate Year, and each subsequent Rate Year, AMPT shall determine its PTRR for the then-current Financial Year which shall be recovered through charges during the upcoming Rate Year in accordance with the Formula Rate, and which shall include the True-Up Adjustment described and defined in Section 2 below (the PTRR and any applicable True-Up Adjustment together comprising the "Annual Projection"). For example, for a Rate Year beginning on June 1, 2020, the PTRR would be calculated based upon the Financial Year January 1, 2020 through December 31, 2020. AMPT shall cause an electronic version of the Annual Projection to be posted in both a Portable Document Format ("PDF") and fully-functioning Excel file at a publicly accessible location on PJM's internet website and OASIS. The date on which the posting occurs shall be that year's "Annual Projection Publication Date."

b. The posting of the Annual Projection shall:

(i) Provide the Formula Rate calculations and all inputs thereto, as well as supporting documentation and workpapers for data that are used in the Annual Projection;

(ii) Include all inputs in sufficient detail to identify the components of AMPT's Annual Projection, explanations of the bases for the projections and input data, and sufficient detail and explanation to enable "Interested Parties" [defined as including but not limited to: (i) any Eligible Customer under the PJM Tariff; (ii) any regulatory agency with rate jurisdiction

over a public utility located within the PJM footprint; (iii) any consumer advocate authorized by state law to review and contest the rates for any such public utility; and (iv) any party with standing under FPA section 205 or section 206] to replicate the calculation of the Annual Projection;

(iii) With respect to any Accounting Changes (as that term is defined in Section 3.e.iii.A):

A. Identify any Accounting Changes including:

- i. The initial implementation of an accounting standard or policy;
- ii. The initial implementation of accounting practices for unusual or unconventional items where FERC has not provided specific accounting direction;
- iii. Correction of errors and prior period adjustments that impact the Annual Projection calculation; and
- iv. The implementation of new estimation methods or policies that change prior estimates.

B. Identify items included in the Annual Projection at an amount other than on a historic cost basis (*e.g.*, fair value adjustments);

C. Identify any reorganization or merger transaction during the previous year and explain the effect of the accounting for such transaction(s) on inputs to the Annual Projection; and

D. Provide, for each item identified pursuant to Section 1.b.iii.A - C of these Protocols, a narrative explanation of the individual impact of such changes on the Annual Projection.

(iv) Include the following information related to affiliate cost allocation:

A. A detailed description of the methodologies used to allocate and directly assign costs between AMPT and its affiliates by service category or function, including any changes to such cost allocation methodologies from the prior year, and the reasons for those changes; and

B. The magnitude of such costs that have been allocated or directly assigned between AMPT and each affiliate by service category or function.

c. If the date for making the posting of the Annual Projection should fall on a weekend or a holiday recognized by FERC, then the posting shall be made no later than the next business day. For the purposes of these Protocols, if any deadline included in these Protocols should fall on a weekend or a holiday recognized by FERC, then the deadline shall be extended to no later than the next business day. Within five (5) calendar days of the posting, PJM shall provide notice of such posting via the PJM Members Committee email subscription ("PJM Exploder List"). Interested Parties can subscribe to the PJM Exploder List on the PJM website.

d. Together with the posting of the Annual Projection, AMPT shall cause to be posted on the PJM internet website and OASIS, and distributed to the PJM Exploder List, the time, date, location, and remote-access information for a stakeholder meeting with Interested Parties in order for AMPT to explain its Annual Projection and to provide Interested Parties an opportunity to seek information and clarifications regarding the Annual Projection ("Annual

Projection Meeting”). The Annual Projection Meeting shall be held no fewer than twenty (20) business days and no more than thirty (30) business days after the posting of the Annual Projection. Notice of the Annual Projection Meeting shall be provided via the PJM Exploder List no fewer than seven (7) calendar days prior to the meeting. AMPT will provide remote access to the Annual Projection Meeting in order to ease burdens (*e.g.*, travel costs) to ensure all Interested Parties have the opportunity to participate.

e. To the extent AMPT agrees to make changes in the Annual Projection for a given Financial Year, such revised Annual Projection shall be promptly posted at a publicly accessible location on PJM’s internet website and OASIS, and e-mailed to the PJM Exploder List. Changes posted earlier than thirty (30) days before the start of the Rate Year, or the next business day if such date is not a business day (or such later date as can be accommodated under PJM’s billing practices), shall be reflected in the Annual Projection to be charged during the Rate Year; changes posted after that date will be reflected, as appropriate, in the True-Up Adjustment for the Financial Year.

f. The PTRR, including the True-Up Adjustment, for each Financial Year, shall be subject to review, challenge, true-up, and refunds or surcharges with interest, to the extent and in the manner provided in these Protocols.

## **Section 2. True-Up Adjustment**

a. Although AMPT is not required to file a FERC Form 1, it will include in its Annual Update, as defined below, and file with the Commission on an informational basis each year a document (the “FERC Form 1 Document”) that presents its financial and operating data for the previous year in the format of, and in accordance with the instructions to, the FERC Form 1. Using data included in its informational FERC Form No. 1 Document for the preceding

Financial Year n, AMPT will calculate the amount of under- or over-collection of its ATRR to be recovered during the Rate Year n+2 (“True-Up Adjustment”). The True-Up Adjustment shall be the sum of the True-Up Adjustment Over/Under Recovery as determined in Section 2(b) and the Interest on the True-Up Adjustment Over/Under Recovery as determined in Section 2(c).

b. The amount collected for AMPT’s transmission revenue requirement during the any Rate Year will be compared to AMPT’s ATRR for the corresponding Financial Year calculated in accordance with AMPT’s Formula Rate and based upon (i) AMPT’s informational FERC Form No. 1 Document for that same Financial Year, (ii) any FERC orders specifically applicable to AMPT’s calculation of its Transmission Revenue Requirement, (iii) the books and records of AMPT, which shall be maintained consistent with the FERC Uniform System of Accounts (“USofA”), (iv) FERC accounting policies and practices applicable to the calculation of annual revenue requirements under formula rates, and (v) any aspects of the PJM Tariff Governing Documents, which include the PJM Tariff, Bylaws, Criteria, and Membership Agreements, that apply to the calculation of annual revenue requirements under individual transmission owner formula rates, to determine any over- or under-recovery (“True-Up Adjustment Over/Under Recovery”).

c. Interest on any True-Up Adjustment Over/Under Recovery shall be calculated for the time period during which the over or under recovery in the revenue requirement remains outstanding. For example, the True-Up Adjustment Over/Under Recovery for Financial Year n shall be collected or refunded with interest in Rate Year n+2. The interest rate to be applied to the True-Up Adjustment Over/Under Recovery amounts will be determined using the average monthly FERC Interest Rate (as determined pursuant to 18 C.F.R. § 35.19a) for the twenty (20) months from the beginning of Rate Year n.

### **Section 3.     Annual Update**

a.       On or before sixty days prior to the start of Rate Year n, AMPT shall calculate and post the PTRR for Financial Year n, the ATRR for Financial Year n-2, and the True Up Adjustment for Financial Year n-2 (“Annual Update”). AMPT shall cause such Annual Update to be posted, in both a PDF and fully-functioning Excel format, at a publicly accessible location on PJM’s internet website and OASIS. Within five (5) calendar days of such posting, PJM shall provide notice of such posting via the PJM Exploder List. There will not be a True-Up Adjustment until this rate has been in effect for two Rate Years.

b.       If the date for making the Annual Update posting should fall on a weekend or a holiday recognized by the FERC, then the posting shall be due on the next business day.

c.       The date on which the posting occurs shall be that year’s “Annual Update Publication Date.”

d.       Together with the posting of the Annual Update, AMPT shall cause to be posted on the PJM website and OASIS the time, date, location, and remote-access information for a stakeholder meeting with Interested Parties in order for AMPT to explain its Annual Update and to provide Interested Parties an opportunity to seek information and clarifications regarding the Annual Update (“Annual Update Meeting”). The Annual Update Meeting shall be held between a date that is not sooner than twenty (20) business days and no later than ninety (90) business days after the Annual Update Publication Date, provided that notice of the Annual Update Meeting shall be given via the PJM Exploder List no fewer than seven (7) calendar days prior to the meeting. AMPT will provide remote access to the Annual Update Meeting in order to ease burdens (*e.g.*, travel costs) to ensure all Interested Parties have the opportunity to participate.



e. The Annual Update posting for the Rate Year:

(i) Shall provide, via the Formula Rate worksheets, sufficiently detailed supporting documentation for data (and all adjustments thereto or allocations thereof) used in the Formula Rate that are not stated in the FERC Form No. 1 Document. It is the intent of the Formula Rate, including the supporting explanations and allocations described therein, that each input to the Formula Rate for purposes of determining the actual Net Revenue Requirement for a given Rate Year will be either taken directly from the FERC Form No. 1 Document or reconcilable to the FERC Form No. 1 Document by the application of clearly identified and supported information. If the Form No. 1 is superseded, the successor form(s) shall be utilized and supplemented as necessary to provide equivalent information as that provided in the Form No. 1. If the FERC Form No. 1 is discontinued, equivalent information as that provided in the FERC Form No. 1 shall be utilized;

(ii) Shall provide sufficient detail and sufficient explanation to enable Interested Parties to replicate the calculation of the Annual Update results from the FERC Form No. 1 Document and verify that each input to the Template is consistent with the requirements of the Formula Rate;

(iii) Shall identify:

A. Any change in accounting that affects inputs to the Template or the resulting charges billed under the Formula Rate (“Accounting Change”), including:

i. The initial implementation of an accounting standard or policy;

ii. The initial implementation of accounting practices for unusual or unconventional items where FERC has not provided specific accounting direction;

iii. Correction of errors and prior period adjustments that impact the True-Up Adjustment calculation; and

iv. The implementation of new estimation methods or policies that change prior estimates.

B. Any items included in the Annual Update at an amount other than on a historic cost basis (*e.g.*, fair value adjustments);

C. Any reorganization or merger transaction during the previous Financial Year and an explanation of the effect of the accounting for such transaction(s) on inputs to the Annual Update; and

D. For each item identified pursuant to Sections 3.e.iii.A – C of these Protocols, the individual impact (in narrative format) of such changes on the Annual Update;

(iv) Shall be subject to review and challenge in accordance with the procedures set forth in Sections 4, 5, and 6 of these Protocols;

(v) Shall be subject to review and challenge in accordance with the procedures set forth in these Protocols with respect to the prudence of any costs and expenditures included for recovery in the Annual Update; provided, however, that nothing in these Protocols is intended to modify the Commission's applicable precedent with respect to the burden of going forward or burden of proof under formula rates in such prudence challenges; and

(vi) Shall not seek to modify the Formula Rate and shall not be subject to challenge by any Interested Party seeking to modify the Formula Rate (*i.e.*, any modifications to the Formula Rate will require, as applicable, appropriate FPA filings or the initiation of an FPA investigation).

f. The following Formula Rate inputs shall be stated values to be used in the Formula Rate until changed pursuant to a filing with the Commission requesting such change: (i) Margin Factor; (ii) costs subject to deferred cost recovery; and (iii) amortization period over which deferred costs are recovered.

#### **Section 4. Annual Review Procedures**

Each Annual Update shall be subject to the following review procedures (“Annual Review Procedures”):

a. Interested Parties shall have up to the later of two-hundred-ten (210) calendar days after the applicable Publication Date, or thirty (30) calendar days after the receipt of all responses to timely submitted information requests (unless such period is extended with the written consent of AMPT or by FERC order) (“Review Period”), to review the calculations and to notify AMPT in writing of any specific challenges to the Annual Update (“Preliminary Challenge”), including challenges related to Accounting Changes. An Interested Party submitting a Preliminary Challenge must specify the inputs, supporting explanations, allocations, calculations, or other information to which it objects, and provide an appropriate explanation and documents to support its challenge. AMPT shall cause to be posted all Preliminary Challenges at a publicly accessible location on PJM’s internet website and OASIS, and a link to the website will be e-mailed to the PJM Exploder List.

b. In the event of a Preliminary Challenge, AMPT will appoint a senior representative to work with the Interested Party (or its representatives) toward a resolution of the dispute.

c. AMPT shall respond in writing to a Preliminary Challenge within twenty (20) business days of receipt, and its response shall notify the challenging party of the extent to which AMPT agrees or disagrees with the challenge. If AMPT disagrees with the Preliminary Challenge, it will provide the Interested Party with an explanation supporting the challenged inputs, explanations, allocations, calculations, or other information. AMPT shall promptly cause to be posted its responses to all Preliminary Challenges at a publicly accessible location on PJM's internet website and OASIS, and a link to the website will be e-mailed to the PJM Exploder List. Notwithstanding the foregoing, Preliminary Challenges and responses to Preliminary Challenges that include material deemed by AMPT to be confidential information will not be publicly posted but will be made available to requesting parties pursuant to a confidentiality agreement to be executed by AMPT and the requesting party.

d. AMPT shall respond to all Preliminary Challenges submitted during the Review Period by no later than thirty (30) calendar days after the end of the Review Period.

e. Interested Parties shall have up to one-hundred-fifty (150) calendar days after each annual Publication Date (unless such period is extended with the written consent of AMPT or by FERC order) to serve reasonable information requests on AMPT ("Discovery Period").

f. Information requests shall be limited to what is necessary to determine: (i) the extent, effect, or impact of an Accounting Change; (ii) whether the Annual Update fails to include data properly recorded in accordance with the Protocols; (iii) the proper application of the Template and procedures in the Protocols; (iv) the accuracy of data and consistency with the

Formula Rate of the charges shown in the Annual Update; (v) the prudence of the actual costs and expenditures, including procurement methods and cost control methodologies; (vi) the effect of any change to the underlying USofA or FERC Form No. 1 Document; and (vii) any other information that may reasonably have substantive effect on the calculation of the charge pursuant to the Formula Rate. The information requests shall not otherwise be directed to ascertaining whether the Formula Rate is just and reasonable. Information requests shall not solicit information concerning costs or allocations where the costs or allocation methods have been determined to be appropriate by FERC in the context of prior AMPT Annual Updates, except that such information requests shall be permitted if they (i) seek to determine if there has been a change in circumstances, (ii) are in connection with corrections pursuant to Section 6 of these Protocols, or (iii) relate to costs or allocations that have not previously been challenged and adjudicated by FERC.

g. AMPT shall make a good faith effort to respond to reasonable information requests pertaining to the Annual Update within fifteen (15) business days of receipt of such requests. AMPT shall respond to all reasonable information requests no later than thirty (30) calendar days after the end of the Discovery Period. AMPT will cause to be posted on the PJM website and OASIS all information requests from Interested Parties and AMPT's response(s) to such requests, and a link to the website will be e-mailed to the PJM Exploder List. Notwithstanding the foregoing, information and document requests and responses to information and document requests that include material deemed by AMPT to be confidential information will not be publicly posted but will be made available to requesting parties pursuant to a confidentiality agreement to be executed by AMPT and the requesting party. Voluminous materials will be made available at a physical AMPT site.

h. AMPT shall not claim that responses to information and document requests provided pursuant to these Protocols are subject to any settlement privilege in any subsequent FERC proceeding addressing AMPT's Annual Update.

i. To the extent AMPT and any Interested Party(ies) are unable to resolve disputes related to information requests submitted in accordance with these Annual Review Procedures, AMPT or the Interested Party may petition the FERC to appoint an Administrative Law Judge as a discovery master to resolve the discovery dispute(s) in accordance with these Protocols and consistent with the FERC's discovery rules.

j. Preliminary Challenges or Formal Challenges (as described in Sections 4 and 5) related to Accounting Changes shall be treated in the same manner under these Protocols as other challenges to the Annual Update. Failure to make a Preliminary Challenge with respect to an Accounting Change in an Annual Update shall not act as a bar with respect to a Formal Challenge with respect to that Annual Update provided that the Interested Party submitted a Preliminary Challenge with respect to one or more other issues. Nor shall such failure bar a subsequent Preliminary Challenge related to a subsequent Annual Update to the extent such Accounting Change affects the subsequent Annual Update.

k. If a change made by AMPT to its accounting policies, practices, or procedures, or the application of the Formula Rate, is found by the FERC to be unjust, unreasonable, or unduly discriminatory or preferential, then the calculation of the charges to be assessed during the Rate Year then under review, and the charges to be assessed during any subsequent Rate Years, including any True-up Adjustments, shall not include such change, but shall include any remedy that may be prescribed by FERC in the exercise of its discretion as of the effective date of such

remedy, to ensure that the Formula Rate continues to operate in a manner that is just, reasonable, and not unduly discriminatory or preferential.

**Section 5.     Resolution of Challenges**

a.       Interested Parties shall have up to two-hundred-seventy (270) days following the applicable Publication Date (unless such period is extended with the written consent of AMPT or by FERC order), to file a challenge with the FERC (“Formal Challenge”). Such Formal Challenge shall be submitted in the same docket as the AMPT informational filing and shall be served on AMPT by electronic service on the date of such filing in accordance with Section 385.2010(f)(3) of the Commission’s regulations. Subject to any applicable confidentiality and Critical Energy Infrastructure Information restrictions, all information and correspondence produced by AMPT pursuant to these Protocols may be included in any Formal Challenge or other FERC proceeding relating to the Formula Rate.

b.       Formal Challenges are to be filed pursuant to these Protocols, rather than under Rule 206, and shall:

(i)      Clearly identify the action or inaction which is alleged to violate the Formula Rate Template or Protocols;

(ii)     Explain how the action or inaction violates the filed rate Template or Protocols;

(iii)    Set forth the business, commercial, economic or other issues presented by the action or inaction as such relate to or affect the party filing the Formal Challenge, including

A.      The extent or effect of an Accounting Change;

B.      Whether the Annual Update fails to include data properly recorded in accordance with these Protocols;

- C. The proper application of the Template and procedures in these Protocols;
- D. The accuracy of the data and consistency with the Formula Rate of the charges shown in the Annual Update;
- E. The prudence of actual costs and expenditures;
- F. The effect of any change to the underlying USofA or the FERC Form No. 1 Document; or
- G. Any other information that may reasonably have substantive effect on the calculation of the charge pursuant to the Formula Rate.

(iv) Make a good faith effort to quantify the financial impact or burden (if any) created for the party filing the Formal Challenge as a result of the action or inaction;

(v) State whether the issues presented are pending in an existing Commission proceeding or a proceeding in any other forum in which the filing party is a party, and if so, provide an explanation why timely resolution cannot be achieved in that forum;

(vi) State the specific relief or remedy requested, including any request for stay or extension of time, and the basis for that relief;

(vii) Include all documents that support the facts in the Formal Challenge in possession of, or otherwise attainable by, the filing party, including, but not limited to, contracts and affidavits; and

(viii) State whether the filing party utilized the Preliminary Challenge procedures described in these Protocols to dispute the action or inaction raised by the Formal Challenge, and, if not, describe why not.



c. Preliminary and Formal Challenges shall be limited to issues that may be necessary to determine: (i) the extent or effect of an Accounting Change; (ii) whether the Annual Update fails to include data properly recorded in accordance with these Protocols; (iii) the proper application of the Formula Rate and procedures in these Protocols; (iv) the accuracy of data and consistency with the Formula Rate of the calculations shown in the Annual Update; (v) the prudence of actual costs and expenditures; (vi) the effect of any change to the underlying USofA or FERC Form No. 1 Document; or (vii) any other information that may reasonably have substantive effect on the calculation of the charge pursuant to the Formula Rate.

d. Failure to raise an issue in a Preliminary Challenge shall not bar an Interested Party from raising that issue in a Formal Challenge, provided the Interested Party submitted a Preliminary Challenge during the Review Period with respect to one or more other issues. Failure to pursue an issue through a Preliminary Challenge or to lodge a Formal Challenge regarding any issue as to a given Annual Update shall bar pursuit of such issue with respect to that Annual Update, but shall not bar pursuit of such issue or the lodging of a Formal Challenge as to such issue as it relates to a subsequent Annual Update.

e. Any response by AMPT to a Formal Challenge must be submitted to the FERC within thirty (30) calendar days of the date of the filing of the Formal Challenge (or such later date as FERC may establish), and shall be served on the filing party(ies) and the PJM Exploder List on the date of such filing.

f. In any Formal Challenge proceeding concerning an Annual Update (including corrections), or Accounting Change(s), AMPT shall demonstrate the justness and reasonableness of the rate resulting from its application of the Formula Rate by demonstrating that it has correctly applied the terms of the Formula Rate consistent with these Protocols and that it

followed the applicable requirements and procedures in applying the Formula Rate. Nothing herein is intended to alter the burdens applied by FERC with respect to prudence challenges.

g. Except as specifically provided herein, nothing herein shall be deemed to limit in any way the right of AMPT to file unilaterally, pursuant to the FPA and the regulations thereunder, an application seeking changes to the Formula Rate or to any of the stated value inputs requiring a prior filing under these Protocols (including, but not limited to, the Margin Factor, and the scope of and amortization period for any deferred costs), or the right of any other party or the Commission to seek such changes pursuant to the FPA and the regulations thereunder.

#### **Section 6. Changes to Annual Updates**

If AMPT determines or concedes that corrections to the Annual Update are required, whether under Section 4 or 5 of these Protocols, including but not limited to those requiring corrections to its FERC Form No. 1 Document, or input data used for a Financial Year that would have affected the Annual Update for that Rate Year, such corrections shall be reflected as adjustments in the Annual Update for the next Rate Year, with interest calculated in accordance with the FERC Interest Rate (as determined pursuant to 18 C.F.R. § 35.19a). This reconciliation mechanism shall apply in lieu of mid-Rate Year adjustments.

## **ATTACHMENT 3**

**Workable Excel Version of Revised  
Attachment H-32A to the PJM OATT**

AMP Transmission LLC  
Calculation of Transmission Revenue Requirements  
Transmission Zone

Attachment H-32A

Year Ended XX/XX/20XX  
Projected or Actual

							Projected -Area
Line No.	Cost of Service Item	(Note A) Page, Line, Col.	Notes	Company Total	Allocator	Qualifying Transmission	
(a)	(b)	(c)	(d)	(e)	(f)	(g)	
						(e) x (f) Allocated Amount	
1	GROSS REVENUE REQUIREMENT (line 54)					#N/A	
2							
3							
4	REVENUE CREDITS	(Note C)		Total	Allocator		
5	Account No. 454	WP02		\$ -	TP 0.00000	\$ -	
6	Account No. 456	WP02		\$ -	TP 0.00000	\$ -	
7	Revenue Credits Specific to zone	WP02		\$ -	D/A	\$ -	
8	Reserved			\$ -	TP 0.00000	\$ -	
9	Transmission Enhancement Credit	WP07		#VALUE!	TP 0.00000	#VALUE!	
10	TOTAL REVENUE CREDITS (sum lines 5-9)					#VALUE!	
11							
12	TRUE-UP ADJUSTMENT WITH INTEREST (Protocols)	(Note D) WP05				\$ -	
13							
14	Adjustments to Net Revenue Requirement (Note G)					\$ -	
15	Interest on Adjustments (Note H)					\$ -	
16	Total Adjustment (line 14 + line 15)					\$ -	
17	NET REVENUE REQUIREMENTS					#N/A	
17a	DIVISOR						
17b	1 Coincident Peak (CP) (MW) - ATSI						MW
17c	Annual Network Rate (\$/MW/Yr) (Line 17 / Line 17b)					#N/A	/MW/Yr
18							
19	O&M/A&G, DEBT SERVICE & OTHER TAXES						
20							
21	Transmission O&M allocable to zone	321.112.b and WP09	WP09	\$ -	TP 0.000%	\$ -	
22	Transmission O&M Specific to zone (Note M)	Zone in title	WP09	\$ -	D/A 100.000%	\$ -	
23	Less Account 565	321.96.b	Form 1	\$ -	TP 0.000%	\$ -	
24	Less: Account 561.2 Load Dispatch - Monitor and Operate Tran:	321.86.b	Form 1	\$ -	TP 0.000%	\$ -	
25	A&G allocable to zone (Note M)	323.197.b and WP09	WP09	\$ -	W&S #DIV/0!	#DIV/0!	
26	A&G Specific to zone (Note M)		WP09	\$ -	W&S 100.000%	\$ -	
27	Other Amortizations - ATSI (Note N)		WP03	\$ -	D/A 100.000%	\$ -	
28	Other Amortizations - AEP (Note N)		WP03	\$ -			
29	Other Amortizations - All zones		WP03	\$ -	D/A		
30	Amortization of Start-Up Costs to zone (Note N)		WP03	\$ -	D/A 100.000%	\$ -	
31	TOTAL O&M (sum lines 21, 23, 25-28, less lines 23 and 24)			\$ -		\$ -	
32							
33	DEBT SERVICE						
34	Debt Service (Note L)		WP06	#VALUE!	TP 0.000%	#VALUE!	
35	Amortization of premium or discount (Note E)			\$ -	TP 0.000%	\$ -	
36	TOTAL DEBT SERVICE (Sum lines 34 and 35 )			#VALUE!		#VALUE!	
37	Interest for Working Capital needs		WP06b	\$ -	TP 0.000%	\$ -	
38							
39	TAXES OTHER THAN INCOME TAXES (Note F)						
40	LABOR RELATED						
41	Payroll	263.i	Form 1	\$ -	W&S #DIV/0!	#DIV/0!	
42	Highway and vehicle	263.i	Form 1	\$ -	W&S #DIV/0!	#DIV/0!	
43	PLANT RELATED	263.i					

44	Property specific to zone (Note M)	Reference zone	WP09	\$	-	D/A	100.000%	\$	-
45	Property allocable to zone (Note M)	263.i and WP09	WP09	\$	-	TP	0.000%	\$	-
46	Other	263.i	Form 1	\$	-	D/A	100.000%	\$	-
47	State Franchise Tax	263.i	Form 1	\$	-	D/A	100.000%	\$	-
48	TOTAL OTHER TAXES (sum lines 41 through 47)								#DIV/0!
49									
50	Subtotal (lines 31 + 36 + 37 + 48)			#VALUE!					#DIV/0!
51									
52	MARGIN REQUIREMENT (Note I) (WP10)	Margin factor	40% of Debt Service	40.0%	#N/A	D/A	100.000%	#N/A	
53									
54	REV. REQUIREMENT (sum lines 50 and 52)				#N/A				#N/A
55									
56	GROSS PLANT IN SERVICE								
57	Production			\$	-	NA			
58	Transmission (Note B)	207.58.g	WP01/04	\$	-	D/A	0.000%	\$	-
59	Distribution			\$	-	N/A		\$	-
60	General & Intangible	205.5.g & 207.99.g	WP01	\$	-	W&S	#DIV/0!		#DIV/0!
61	Reserved			\$	-	TP	#DIV/0!		#DIV/0!
62	Other			\$	-	TP	0.000%	\$	-
63	TOTAL GROSS PLANT (sum lines 57 - 62)				\$	-			#DIV/0!
64									
65	TRANSMISSION PLANT % INCLUDED IN PJM COST OF SERVICE								
66									
67	Total transmission plant		WP04					\$	-
68	Less Non-Qualifying Transmission Plant		WP04					\$	-
69	Less transmission plant included in OATT Ancillary Services		WP04					\$	-
70	Total Qualifying Transmission Plant in Service (line 67 - 68 - 69)							\$	-
71									
72	Percentage of PJM Qualifying transmission plant included in Cost of Service (line 70 / line 67)							TP=	0%

AMP Transmission LLC  
Calculation of Transmission Revenue Requirements

Transmission Zone

Attachment H-32A

Cash-Flow Model

Year Ended XX/XX/20XX

Projected or Actual

Line No.	Cost of Service Item	(Note A) Page, Line, Col.	Notes	Company Total	Allocator	Projected -Area Qualifying Transmission
						(g)
(a)	(b)	(c)	(d)	(e)	(f)	(e) x (f) Allocated Amount
73						
74	TRANSMISSION EXPENSES					
75						
76	Total transmission expenses (line 21+22 Column e)					0
77	Less transmission expenses included in OATT Ancillary Services (Note J)					0
78	Included transmission expenses (line 76 less line 77)					0
79						
80	Percentage of transmission expenses after adjustment (line 78 divided by line 76)					0.00000
81	Percentage of transmission plant included in ISO Rates (line 72)				TP	0.00000
82	Percentage of transmission expenses included in ISO Rates (line 80 times line 81)				TE=	0.00000
83						
84						
85	WAGES & SALARY ALLOCATOR (W&S) (Note K)					
86	Production			\$ - 0.00%	\$ -	
87	Transmission (WP04)			\$ 1 #DIV/0!	\$ #DIV/0!	
88	Distribution			\$ - 0.00%	\$ -	
89	Other			\$ - 0.00%	\$ -	
90	Total (sum lines 86-89)			\$ 1	#DIV/0!	W&S Allocator (\$ / Allocation) = #DIV/0! = WS

Rate Formula Template  
Utilizing Informational FERC Form 1 Data

General Note: References to pages in this formulary rate are indicated as: (page#, line#, col.#)  
References to data from Informational FERC Form 1 are indicated as: #.y.x (page, line, column)

- Notes
- A AMPT will maintain and post with informational filings an Informational FERC Form 1.
- B Beginning/End year balances will match Form 1. 13-Month average balances shown on WP-01. Qualifying zonal transmission investment shown on WP04. Excluding any Transmission AROs
- C The revenues credited on page 1 lines 5-9 shall include only the amounts received directly (in the case of grandfathered agreements) or from the ISO (for service under this tariff) reflecting the Transmission Owner's integrated transmission facilities. They do not include revenues associated with FERC annual charges, gross receipts taxes, ancillary services, facilities not included in this template (e.g., direct assignment facilities and GSUs) which are not recovered under this Rate Formula Template.
- D The True-Up adjustment is the difference between (1) the revenues received for the twelve month period and (2) the ATRR for that twelve month period after it is known, with interest Over Recoveries are entered as negative to reduce the net revenue. Under recoveries are entered as Positive to increase the net revenue.
- E Includes amounts recorded to accounts 428 and 429.
- F Includes only FICA, unemployment, highway, property, gross receipts, PILOT, and other assessments charged in the current year. Taxes related to income are excluded. Gross receipts taxes are not included in transmission revenue requirement in the Rate Formula Template, since they are recovered elsewhere.
- G Adjustments required pursuant to Section 6 of the AMPT Protocols. Refunds shall be entered as a negative number to reduce the net revenue requirement. Surcharges shall be entered as a positive number to increase the net revenue requirement.
- H Interest required pursuant to Section 2(c) of Protocols. Interest on any refunds shall be entered as a negative number to reduce the net revenue requirement. Interest on surcharge shall be entered as a positive number to increase the net revenue requirement.
- I Margin Factor equals .40 or 40% of debt service. Margin Requirement is the dollar amount that results from applying the Margin Factor to annual debt service. The Margin Factor can only be changed by Order of the Commission
- J Removes dollar amount of transmission expenses included in the OATT ancillary services rates, including all of Account No. 561.1, 561.2, 561.3 and 561.BA.

122	K	AMPT will have no wages and salaries. However, all A&G expense incurred by AMPT will be 100% related to AMPT Transmission
123	L	PTRR debt service projections for zone are shown on WP06. Actual ATRR debt service (for True-up template) will be from AMPT accounting records
124		With respect to purchased assets, principal and interest payments related to borrowings in excess of the seller's net book value will not be included in the PTRR or ATRR debt service.
125	M	If ASTI zone, entry is WP09, line Col (d) for O&M and A&G
126		If AEP zone, entry is WP09, line Col (d) for O&M and A&G
127	N	Includes amortization of pre-commercial Start-Up costs booked in account 182.3, approved by the Commission and amortized through Account 566.

AMP Transmission LLC

Gross Plant in Service - 13 Month Average Balances

Attachment H-32A - WP01 - Plant

Line No.	Month	Year	Production	Transmission	Distribution	General	Intangible	Total
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
			[A] 205.46.g	207.58.g	207.75.g	207.99.g	205.5.g	
1	Month 1	20XX		-		-	-	-
2	Month 2	#VALUE!		-		-	-	-
3	Month 3	#VALUE!		-		-	-	-
4	Month 4	#VALUE!		-		-	-	-
5	Month 5	#VALUE!		-		-	-	-
6	Month 6	#VALUE!		-		-	-	-
7	Month 7	#VALUE!		-		-	-	-
8	Month 8	#VALUE!		-		-	-	-
9	Month 9	#VALUE!		-		-	-	-
10	Month 10	#VALUE!		-		-	-	-
11	Month 11	#VALUE!		-		-	-	-
12	Month 12	#VALUE!		-		-	-	-
13	Month 13	#VALUE!		-		-	-	-
14								
15	13-month Average		-	-	-	-	-	-
16								
17								

Asset Retirement Cost for Transmission Plant			
			Transmission
		[A]	207.57.g
21			
22	Month 1	20XX	-
23	Month 2	#VALUE!	-
24	Month 3	#VALUE!	-
25	Month 4	#VALUE!	-



26	Month 5	#VALUE!	-
27	Month 6	#VALUE!	-
28	Month 7	#VALUE!	-
29	Month 8	#VALUE!	-
30	Month 9	#VALUE!	-
31	Month 10	#VALUE!	-
32	Month 11	#VALUE!	-
33	Month 12	#VALUE!	-
34	Month 13	#VALUE!	-
35			
36	13-month Average		-

37  
38 Notes:

39 [A] Reference for December balances as would be reported in FERC Form 1. Whether used in a PJM transmission zone with a .  
40 calendar year or non-calendar year rate period, AMPT will always forecast and true-up to the calendar/financial year because  
41 the AMPT revenue requirement is ultimately determined using values reported by AMPT in the format of the FERC Form 1

AMP Transmission LLC  
Revenue Credits Workpaper

H-32A-WP02 - Revenue Credits

Add Lines if needed			
Line			
<u>No.</u>	<u>REVENUE CREDITS</u>	<u>Amount</u>	<u>Description of Revenue Credits</u>
(a)	(b)	(c)	(d)
<b><u>ADD LINES AS NEEDED FOR ADDITIONAL REVENUE CREDITS</u></b>			
1	Account No. 454	\$ -	
2	Account No. 454 Revenue Credits specific to zone	\$ -	
3	Account No. 454 Revenue Credits allocable to all zones	\$ -	
4			
5			
6			
7	Account No. 456	\$ -	
8	Account No. 456 Revenue Credits specific to zone	\$ -	
9	Account No. 456 Revenue Credits allocable to all zones	\$ -	
10			
11			
12	Other Revenue Credits specific to zone	\$ -	
13			
14			
15			



Other Amortizations - AEPTotaltermYearly  
Amortization

Page 6 of 17

List other AEP Amortizations here	\$	-	0	\$	-	
List other AEP Amortizations here	\$	-	0	\$	-	
List other AEP Amortizations here	\$	-	0	\$	-	
List other AEP Amortizations here	\$	-	0	\$	-	Add lines as needed
List other AEP Amortizations here	\$	-	0	\$	-	
List other AEP Amortizations here	\$	-	0	\$	-	
List other AEP Amortizations here	\$	-	0	\$	-	
Total AEP zonal Amortizations	\$	-	0	\$	-	

AMP Labor - Start-up amortized over 3 or 1 years.

## LABOR FOR SEPT\_DEC

AMP Labor Hours	% Time	Hours	Expenses	
1	10%	52		3 months remaining
2	10%	52		
3	50%	260		
4	35%	182		
5	90%	468		
6	10%	52		
7	10%	52		
8	10%	52		
9	5%	26		
10	20%	104		
11	20%	104		
12	5%	26		
13	5%	26		
14	20%	104		
15	20%	104		
16	5%	26		
LABOR HOURS		1690		
			Blended Rate	
			\$	75.00
LABOR EXPENSES	41%		\$	-
Labor Overhead			\$	-
			\$	-

Budget for Oct - Dec 2018

\$ - Actuals thru September  
 \$ - Budget October - December based on AMP % allocation  
 \$ - Total

But, 3 vs 1 year split is thru August!

So, \$155,071/9\*8 = actual thru August

Half goes to 3 year, half to 1

Remainder goes to ATSI; \$333,789-\$137,841

\$ -  
 \$ -  
 \$ -

### AMP Transmission LLC Start-Up Costs

	Deferred from and Incurred in
	<u>2020</u>
Other Deferred Costs	
xxxxxxxxx	\$ -
xxxxxxxxx	\$ -
xxxxxxxxx	\$ -
xxxxxxxxx	\$ -
Total Other Deferred Costs	\$ -
Number of anticipated Transmission Zones	2 ATSI and AEP East
Amortization period	3 years
Yearly Amortization	\$ - ATSI Zone
Deferred to AEP Zone	\$ - AEP zone for future request at FERC

## AMP Transmission LLC

## Zonal Investment Workpaper

Page 7 of 18

Add Zones if necessary. Add lines for more project investment

Line No.

1	<b><u>AMPT Transmission Investment - Gross Plant</u></b>				
2	(a)	(b)	(c)	(d)	(e)
3					AMPT
4		<u>ATSI</u>	<u>AEP</u>	<u>Other zone</u>	<u>Total</u>
5					
6	City of Napoleon Assets	\$ -	\$ -	\$ -	\$ -
7	Non-Qualifying	\$ -	\$ -	\$ -	\$ -
8	Total Qualifying	\$ -	\$ -	\$ -	\$ -
9					
10	Zonal Allocation	0%	0%	0%	
11					
12	Allocated To Zone	\$ -	\$ -	\$ -	\$ -
13					
14					
15	<b><u>Transmission Plant recovered in Ancillary Services</u></b>				
16					
17					
18					AMPT
19		<u>ATSI</u>	<u>AEP</u>	<u>Other Zone</u>	<u>Total</u>
20					
21	Amount	\$ -	\$ -	\$ -	\$ -
22					
23	Zonal Allocation	0%	0%	0%	
24					
25	Allocated To Zone	\$ -	\$ -	\$ -	\$ -
26					
27					
28	<b><u>Wages and Salaries Proxy - Gross Plant in Each Zone</u></b>				
29					
30	Line 12(a, b, or c) divided by Line 12 (e)	#DIV/0!	#DIV/0!	#DIV/0!	

# AMP Transmission LLC

True-Up and Adjustments Workpaper

## AMPT True-up with Interest - based on Protocols

NITS Revenues received by PJM for the Year (Note 2)	-	Actual Revenue Requirement For Year (ATRR)	-	=	True-up Adjustment - (Over)/Under Recovery	-
\$	-	\$	-		\$	-

Over (Under) Recovery Plus Interest	Average Monthly Interest Rate	Months	Calculated Interest	Amortization
Interest Rate on Amount of Refunds or Surcharges (Note 1)	0.3542%			

As an example, an over or under collection will be recovered prorata over 2019, held for 2020 and returned prorata over 2021

### Calculation of Interest

					Monthly
January	Year 2019	-	0.3542%	12	-
February	Year 2019	-	0.3542%	11	-
March	Year 2019	-	0.3542%	10	-
April	Year 2019	-	0.3542%	9	-
May	Year 2019	-	0.3542%	8	-
June	Year 2019	-	0.3542%	7	-
July	Year 2019	-	0.3542%	6	-
August	Year 2019	-	0.3542%	5	-
September	Year 2019	-	0.3542%	4	-
October	Year 2019	-	0.3542%	3	-
November	Year 2019	-	0.3542%	2	-
December	Year 2019	-	0.3542%	1	-
					-

					Annual
January through December	Year 2020	-	0.3542%	12	-

### Over (Under) Recovery Plus Interest Amortized and Recovered Over 12 Months

					Monthly
January	Year 2021	-	0.3542%		-
February	Year 2021	-	0.3542%		-
March	Year 2021	-	0.3542%		-
April	Year 2021	-	0.3542%		-
May	Year 2021	-	0.3542%		-
June	Year 2021	-	0.3542%		-
July	Year 2021	-	0.3542%		-
August	Year 2021	-	0.3542%		-
September	Year 2021	-	0.3542%		-
October	Year 2021	-	0.3542%		-
November	Year 2021	-	0.3542%		-
December	Year 2021	-	0.3542%		-
					-

True-Up with Interest	\$	-
Less Over (Under) Recovery	\$	-
Total Interest	\$	-

#### Note 1:

Interest Rate on Amount of Refunds or Surcharges is the monthly average interest rate calculated in accordance with section 2(c) of the AMPT Formula Rate Protocols.

#### Note 2:

Exclude any true-up amount included in the PTRR for the year being true-up





**AMP Transmission LLC**  
True-Up and Adjustments Workpaper

Page 8b of 18

**AMPT True-up with Interest - under Non-Calendar Year Protocols**

NITS Revenues received from PJM for the Rate Year (Note 2)		Actual Revenue Requirement For Financial Year (ATRR)		True-up Adjustment - (Over)/Under Recovery
\$ -	-	\$ -	=	\$ -

	Over (Under) Recovery Plus Interest	Average Monthly Interest Rate	Months	Calculated Interest	Amortization	Surcharge (Refund) Owed
Interest Rate on Amount of Refunds or Surcharges (Note 1)		0.3542%				

As an example, an over or under collection will be recovered prorata over Rate Year "n", held for Rate Year "n+1" and returned prorata over Rate Year "n+2"

Calculation of Interest

					Monthly	
Month 1	Rate Year "n"	-	0.3542%	12	-	-
Month 2	Rate Year "n"	-	0.3542%	11	-	-
Month 3	Rate Year "n"	-	0.3542%	10	-	-
Month 4	Rate Year "n"	-	0.3542%	9	-	-
Month 5	Rate Year "n"	-	0.3542%	8	-	-
Month 6	Rate Year "n"	-	0.3542%	7	-	-
Month 7	Rate Year "n"	-	0.3542%	6	-	-
Month 8	Rate Year "n"	-	0.3542%	5	-	-
Month 9	Rate Year "n"	-	0.3542%	4	-	-
Month 10	Rate Year "n"	-	0.3542%	3	-	-
Month 11	Rate Year "n"	-	0.3542%	2	-	-
Month 12	Rate Year "n"	-	0.3542%	1	-	-
					-	-

					Annual	
Month 1 through Month 12	Rate Year "n+1"	-	0.3542%	12	-	-

Over (Under) Recovery Plus Interest Amortized and Recovered Over 12 Months

					Monthly	
Month 1	Rate Year "n+2"	-	0.3542%		-	-
Month 2	Rate Year "n+2"	-	0.3542%		-	-
Month 3	Rate Year "n+2"	-	0.3542%		-	-
Month 4	Rate Year "n+2"	-	0.3542%		-	-
Month 5	Rate Year "n+2"	-	0.3542%		-	-
Month 6	Rate Year "n+2"	-	0.3542%		-	-
Month 7	Rate Year "n+2"	-	0.3542%		-	-
Month 8	Rate Year "n+2"	-	0.3542%		-	-
Month 9	Rate Year "n+2"	-	0.3542%		-	-
Month 10	Rate Year "n+2"	-	0.3542%		-	-
Month 11	Rate Year "n+2"	-	0.3542%		-	-
Month 12	Rate Year "n+2"	-	0.3542%		-	-
					-	-

True-Up with Interest	\$ -
Less Over (Under) Recovery	\$ -
Total Interest	\$ -

Note 1:

Interest Rate on Amount of Refunds or Surcharges is the monthly average interest rate calculated in accordance with section 2(c) of the AMPT Formula Rate Protocols.

Note 2:

Exclude any true-up amount included in the PTRR for the year being true-up

For ATRR and True-up, AMPT will record actual P&I in the year and those P&I entries will be populated in H-32A, page 1, line 36

Add Additional Project Columns as needed

AMPT Projects												
	Project #1	Project #2	Project #3	Project #4	Project #5	Project #6	Project #7	Project #8	Project #9	Project #10	Total Projected	
Project Name:												
Loan Principal:												
Less Acquisition Premium:												
Net Loan Principal:												
Loan Term (Years):												
Loan Start Date:												
Loan End Date:	#####											
Annual Interest Rate:												
Projected Yearly Debt Service Payment:	#NUM!											
Debt Service Schedule (Yearly)												
Year												
2019	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2020	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2021	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2022	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2023	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2024	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2025	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2026	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2027	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2028	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2029	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2030	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2031	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2032	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2033	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2034	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2035	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2036	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2037	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2038	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2039	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2040	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2041	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2042	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2043	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2044	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2045	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2046	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2047	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2048	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2049	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2050	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2051	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2052	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2053	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2054	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2055	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2056	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2057	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2058	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2059	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2060	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!	
2061	#NUM!	\$0	\$0	\$0	\$0</							

**Attachment H-32A - WP06 - Debt Service**

**Debt Service Payments - Year End XX/XX/20XX**

Add Additional "Other" Columns as needed

Other AMPT Capitalized Equipment											
	Project #1	Project #2	Project #3	Project #4	Project #5	Project #6	Project #7	Project #8	Project #9	Project #10	Total Projected
Project Name:											
Loan Principal:											\$0
Less Acquisition Premium											\$0
Net Loan Principal											\$0
Loan Term (Years):											
Loan Start Date:											
Loan End Date:											
Annual Interest Rate:											
Projected Yearly Debt Service Payment:	#NUM!										
Debt Service Schedule (Yearly)											
Year											
2019	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2020	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2021	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2022	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2023	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2024	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2025	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2026	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2027	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2028	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2029	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2030	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2031	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2032	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2033	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2034	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2035	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2036	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2037	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2038	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2039	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2040	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2041	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2042	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2043	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2044	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2045	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2046	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2047	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2048	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2049	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2050	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2051	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2052	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2053	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2054	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2055	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2056	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2057	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2058	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2059	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2060	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	#NUM!
2061	#NUM!	\$0	\$0	\$0							

AMP Transmission LLC

Debt Service Workpaper - Monthly

Debt Service Payments - Year End XX/XX/20XX

This tab is to accommodate projects that may go in service or close mid-year in any particular month

Add Additional Project Columns and lines as needed

AMPT Projects													
				Project #1	Project #2	Project #3	Project #4	Project #5	Project #6	Project #7	Project #8	Project #9	Project #10
				#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
From WP06	Total Debt Service Over Loan Term			#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
<u>Debt Service Schedule (Monthly)</u>													
Year		Month											
2019		1/1/2019	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019		2/1/2019	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019		3/1/2019	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019		4/1/2019	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019		5/1/2019	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019		6/1/2019	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019		7/1/2019	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019		8/1/2019	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019		9/1/2019	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019		10/1/2019	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019		11/1/2019	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2019		12/1/2019	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020		1/1/2020	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020		2/1/2020	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020		3/1/2020	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020		4/1/2020	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020		5/1/2020	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020		6/1/2020	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020		7/1/2020	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020		8/1/2020	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020		9/1/2020	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020		10/1/2020	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020		11/1/2020	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2020		12/1/2020	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021		1/1/2021	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021		2/1/2021	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021		3/1/2021	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021		4/1/2021	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021		5/1/2021	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021		6/1/2021	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021		7/1/2021	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021		8/1/2021	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021		9/1/2021	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021		10/1/2021	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021		11/1/2021	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2021		12/1/2021	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022		1/1/2022	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2022		2/1/2022	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

ADD ROWS AND COLUMNS AS NEEDED OVER TIME

[illegible]

## ADD ROWS AND COLUMNS AS NEEDED OVER TIME

[illegible]

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## ADD ROWS AND COLUMNS AS NEEDED OVER TIME

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## ADD ROWS AND COLUMNS AS NEEDED OVER TIME

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## ADD ROWS AND COLUMNS AS NEEDED OVER TIME

[illegible]

## ADD ROWS AND COLUMNS AS NEEDED OVER TIME

[illegible]



[illegible]

2086	2/1/2086	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2086	3/1/2086	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2086	4/1/2086	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2086	5/1/2086	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2086	6/1/2086	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2086	7/1/2086	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2086	8/1/2086	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2086	9/1/2086	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2086	10/1/2086	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2086	11/1/2086	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2086	12/1/2086	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2087	1/1/2087	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2087	2/1/2087	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2087	3/1/2087	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2087	4/1/2087	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2087	5/1/2087	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2087	6/1/2087	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2087	7/1/2087	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2087	8/1/2087	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2087	9/1/2087	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2087	10/1/2087	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2087	11/1/2087	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2087	12/1/2087	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2088	1/1/2088	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2088	2/1/2088	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2088	3/1/2088	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2088	4/1/2088	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2088	5/1/2088	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2088	6/1/2088	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2088	7/1/2088	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2088	8/1/2088	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2088	9/1/2088	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2088	10/1/2088	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2088	11/1/2088	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2088	12/1/2088	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

ADD ROWS AND COLUMNS AS NEEDED OVER TIME

# AMP Transmission LLC

Debt Service Worksheet - Monthly

Page 12 of 18

## Debt Service Payments - Year End XX/XX/20XX

Add Additional "Other" Columns and lines as needed

Other AMPT Capitalized Equipment													
				Project #1	Project #2	Project #3	Project #4	Project #5	Project #6	Project #7	Project #8	Project #9	Project #10
From WP06		Total Debt Service Over Loan Term		#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
<u>Debt Service Schedule (Monthly)</u>													
Year		Month											
2019		2019	1/1/2019	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		2019	2/1/2019	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		2019	3/1/2019	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		2019	4/1/2019	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		2019	5/1/2019	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		2019	6/1/2019	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		2019	7/1/2019	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		2019	8/1/2019	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		2019	9/1/2019	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		2019	10/1/2019	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		2019	11/1/2019	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		2019	12/1/2019	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		2020	1/1/2020	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		2020	2/1/2020	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		2020	3/1/2020	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		2020	4/1/2020	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		2020	5/1/2020	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		2020	6/1/2020	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		2020	7/1/2020	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		2020	8/1/2020	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		2020	9/1/2020	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		2020	10/1/2020	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		2020	11/1/2020	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		2020	12/1/2020	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		2021	1/1/2021	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		2021	2/1/2021	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		2021	3/1/2021	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		2021	4/1/2021	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		2021	5/1/2021	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		2021	6/1/2021	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		2021	7/1/2021	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		2021	8/1/2021	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		2021	9/1/2021	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		2021	10/1/2021	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		2021	11/1/2021	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		2021	12/1/2021	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		2022	1/1/2022	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

ADD ROWS AND COLUMNS AS NEEDED OVER TIME

[illegible]

[illegible]

[illegible]



[illegible]



[illegible]



[illegible]



[illegible]

[illegible]

[illegible]

[illegible]



2086	1/1/2086	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2086	2/1/2086	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2086	3/1/2086	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2086	4/1/2086	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2086	5/1/2086	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2086	6/1/2086	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2086	7/1/2086	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2086	8/1/2086	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2086	9/1/2086	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2086	10/1/2086	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2086	11/1/2086	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2086	12/1/2086	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2087	1/1/2087	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2087	2/1/2087	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2087	3/1/2087	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2087	4/1/2087	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2087	5/1/2087	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2087	6/1/2087	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2087	7/1/2087	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2087	8/1/2087	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2087	9/1/2087	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2087	10/1/2087	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2087	11/1/2087	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2087	12/1/2087	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2088	1/1/2088	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2088	2/1/2088	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2088	3/1/2088	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2088	4/1/2088	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2088	5/1/2088	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2088	6/1/2088	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2088	7/1/2088	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2088	8/1/2088	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2088	9/1/2088	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2088	10/1/2088	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2088	11/1/2088	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2088	12/1/2088	#NUM!	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

ADD ROWS AND COLUMNS AS NEEDED OVER TIME

**AMP Transmission LLC**

## Zonal Investment Workpaper

Line No.	Components - Description	Amounts
(a)	(b)	(c)
1	AMPT Working Capital Loan from AMP	\$ -
2		
3	Prime Rate	5.25%
4		
5	Interest on Working Capital Loan <sup>1</sup>	\$ -
6		
7		
8	For ATRR and True-up, AMPT will record actual interest expense	
9		
10	Note 1: to Attachment H-32A, page 1, line 37	
11		
12	For ATRR and True-up, interest will be per books	
13	For PTRR, use most recent available Prime Rate when projections are done	

**AMP Transmission LLC****Transmission Enhancement Credit (Schedule 12 Projects)**

To be completed in conjunction with Attachment H-32A

Line No.	(1)	(2) <u>Reference</u>	(3) <u>Transmission</u>	(4) <u>Allocator</u>
1	Gross Transmission Plant - Total		\$ -	
2	Net Transmission Plant - Total			
3				
4	O&M EXPENSE			
5	Total O&M Allocated to Transmission		\$ -	
6	Annual Allocation Factor for O&M		0.00%	0.00%
7				
8	DEBT SERVICE		#VALUE!	
9	Annual Allocation Factor for Debt Service		#VALUE!	#VALUE!
10				
11	MARGIN REQUIREMENT		#N/A	
12	Annual Allocation Factor for Margin Requirement		#N/A	#N/A
13				
14	TAXES OTHER THAN INCOME TAXES			
15	Total Other Taxes		#DIV/0!	
16	Annual Allocation Factor for Other Taxes		#DIV/0!	#DIV/0!
17				
18	<b>Annual Allocation Factor for Expense and Margin Requirement</b>	<b>Sum of line 6 through 16</b>		<b>#VALUE!</b>
19				
20				
21	<b>Add lines for projects as needed</b>			

**Transmission Enhancement Credit (Schedule 12 Projects)**

To be completed in conjunction with Attachment H-32A

Line No.	(1) Project Name	(2) RTEP Project Number	(3) Project Gross Plant	(4) Annual Allocation Factor for Expense	(5) Annual Expense Charge	(6) Project Net Plant	(7) Annual Allocation Factor for Return	(8) Annual Return Charge	(9) Project Depreciation Expense	(10) True-up Adjustment	(11) Annual Revenue Requirement with True-up
28				(line 18)	(Col. 3 * Col. 4)	N/A		(Col. 6 * Col. 7)		(WP08-True-up Col. i)	(Sum Col. 5, 8, 9 & 10)
29											
30	1a		\$ -	#VALUE!	#VALUE!	N/A	0.00%	\$ -	\$ -	-	#VALUE!
31	1b		\$ -	#VALUE!	#VALUE!	N/A	0.00%	\$ -	\$ -	-	#VALUE!
32	1c		\$ -	#VALUE!	#VALUE!	N/A	0.00%	\$ -	\$ -	-	#VALUE!
33											
34											
35											
36											
37											
38	2	Transmission Enhancement Credit for Attachment H-32A Page 1, Line 9									#VALUE!

Notes

- A Gross Transmission Plant is that identified on page 2 line 2 of Attachment H-21A.
- B Net Transmission Plant is that identified on page 2 line 14 of Attachment H-21A.
- C
- D Project Gross Plant is the total capital investment for the project calculated in the same method as the gross plant value in line 1 above. This value includes subsequent capital investments required to maintain the project in-service.
- E Project Net Plant is the Project Gross Plant Identified in Column 3 less the associated Accumulated Depreciation.
- F Project Depreciation Expense is the actual value booked for the project and included in the Depreciation Expense in Attachment H-21A page 3 line 12.

## AMP Transmission LLC

Transmission Enhancement Credit (Schedule 12 Projects)

Page 15 of 18

Add more lines as needed

## Transmission Enhancement Credit - True-up

To be completed after WP07 for the True-up Year is updated using actual data

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
Line No.	Project Name	RTEP Project Number	Actual TEC Revenues	Projected TEC Annual Revenue Requirement	Actual TEC Revenues Allocated to Projects	Actual TEC Annual Revenue Requirement	True-up Adjustment Principal Under/(Over)	Applicable Interest on Under/(Over)	True-up Adjustment with Interest Under/(Over)
				from PTRR	[Col. c, line 1 * (Col. d, line 2x / Col. d, line 3)]	from ATRR	Col. f - Col. e	Col. g * [(line 4a / line 4b) - 1]	Col. g + Col. H
1	[A] Actual PJM TEC Revenues for True-up Year		-						
2a		b		-	-		-	-	-
2b		b		-	-		-	-	-
2c		b		-	-		-	-	-
3	Subtotal			-	-	-			
4a	Revenue Requirement True-up with Interest						-		
4b	Revenue Requirement True-up - Over/Under Recovery						-		

## NOTE

[A] Amount included in revenues reported on page 330, column k of FERC Form 1.

**AMP Transmission LLC**  
Transmission O&M, A&G, and Other Taxes Workpaper

Page 16 of 18

Add lines and other zones as needed to increase transparency

**TRANSMISSION O&M, A&G, and OTHER TAXES DETAIL**

Add Lines and Columns to if necessary to increase transparency

Line No. (a)	Item (b)	Form 1 Reference (c)	Amount (d)	Deferred (e)	Description (f)
1	<b>Total Transmission O&amp;M - 20XX Projections</b>	321.112.b			From Informational AMPT Form 1 - ATRR True-up
2				Est. for Zone	
3	Total Transmission O&M Specific to ATSI zone	<u>Total</u>	<u>Alloc</u>	<u>ATSI</u>	<u>Projections</u>
4	consultant	\$0	35%	\$0	\$0 Transmission modeling and analysis services
5	consultant Implementation	\$0	100%	\$0	\$0 communications equipment
6	consultant Annual	\$0	100%	\$0	\$0 operational services for PJM communications and dispatch for transmission equip
7	consultant	\$0	35%	\$0	\$0 consulting services for equip evaluation for NERC BES compliance and Tariff eligibility
8	consultant	\$0	35%	\$0	\$0 Consultants
9	legal	\$0	50%	\$0	\$0 Legal
10	legal	\$0	100%	\$0	\$0 Legal
11	legal	\$0	100%	\$0	\$0 Legal
12	O&M Napoleon	\$0	100%	\$0	\$0 O&M on facilities
13	Meals/Travel	\$0	35%	\$0	\$0
14	Insurance	\$0	100%	\$0	\$0
15		\$0		\$0	\$0
16	List transmission specific to ATSI zone here - add rows if necessary	\$0		\$0	\$0
17		\$0		\$0	\$0 sum of transmission O&M specific to ATSI zone
18	Total Transmission O&M Specific to AEP zone				
19	List transmission specific to AEP zone here - add rows if necessary			\$ -	\$ - Add description
20	List transmission specific to AEP zone here - add rows if necessary			\$ -	\$ - Add description
21	List transmission specific to AEP zone here - add rows if necessary			\$ -	\$ - Add description
22	List transmission specific to AEP zone here - add rows if necessary			\$ -	\$ - Add description
23	List transmission specific to AEP zone here - add rows if necessary			\$ -	\$ - Add description
24				\$ -	\$ - sum of transmission O&M specific to AEP zone
25	Total Transmission O&M Specific to all zones				
26	List transmission specific to all zones here - add rows if necessary			\$ -	\$ - Add description
27	List transmission specific to all zones here - add rows if necessary			\$ -	\$ - Add description
28	List transmission specific to all zones here - add rows if necessary			\$ -	\$ - Add description
29	List transmission specific to all zones here - add rows if necessary			\$ -	\$ - Add description
30	List transmission specific to all zones here - add rows if necessary			\$ -	\$ - Add description
31				\$ -	\$ - sum of transmission O&M specific to all zones
32					

ADD LINES AND ZONES FOR DATA IN FUTURE AS NEEDED

# AMP Transmission LLC

## Transmission O&M, A&G, and Other Taxes Workpaper

Page 17 of 18

Attachment H-32A - WP09 - Transmission O&M

Line No. (a)	Item (b)	Form 1 Reference (c)	Amount (d)	Deferred (e)	Description (f)
33	<b>A&amp;G Expense</b>	323.197.b	\$	-	From Informational Form 1 for ATRR True-up, otherwise estimate for PTRR
34					
35	Total A&G Specific to ATSI zone				
36	AMP Labor and Overheads Allocable to the ASTI Zone	\$0	35%	\$ -	\$ - AMP staff labor and overhead
37	List A&G specific to ATSI zone here - add rows if necessary	\$0		\$ -	\$ - Add description
38	List A&G specific to ATSI zone here - add rows if necessary	\$0		\$ -	\$ - Add description
39	List A&G specific to ATSI zone here - add rows if necessary	\$0		\$ -	\$ - Add description
40	List A&G specific to ATSI zone here - add rows if necessary	\$0		\$ -	\$ - Add description
41	List A&G specific to ATSI zone here - add rows if necessary	\$0		\$ -	\$ - Add description
42		\$0		\$ -	\$ - sum of A&G specific to ATSI zone
43	Total A&G Specific to AEP zone				
44	List A&G specific to AEP zone here - add rows if necessary			\$ -	\$ - Add description
45	List A&G specific to AEP zone here - add rows if necessary			\$ -	\$ - Add description
46	List A&G specific to AEP zone here - add rows if necessary			\$ -	\$ - Add description
47	List A&G specific to AEP zone here - add rows if necessary			\$ -	\$ - Add description
48	List A&G specific to AEP zone here - add rows if necessary			\$ -	\$ - Add description
49				\$ -	\$ - sum of A&G specific to AEP zone
50	Total A&G Specific to all zones				
51	List A&G specific to all zones here - add rows if necessary			\$ -	\$ - Add description
52	List A&G specific to all zones here - add rows if necessary			\$ -	\$ - Add description
53	List A&G specific to all zones here - add rows if necessary			\$ -	\$ - Add description
54	List A&G specific to all zones here - add rows if necessary			\$ -	\$ - Add description
55	List A&G specific to all zones here - add rows if necessary			\$ -	\$ - Add description
56	Total A&G Specific to all zones			\$ -	\$ - sum of A&G specific to all zones
57					
58					
59	<b>Other Taxes</b>	263.i	\$	-	From Informational Form 1 for ATRR True-up, otherwise estimate for PTRR
60					
61	Other Taxes specific to ATSI Zone				
62	Other Tax specific to ATSI zone here - add rows if necessary			\$ -	\$ - Add description
63	Other Tax specific to ATSI zone here - add rows if necessary			\$ -	\$ - Add description
64	Other Tax specific to ATSI zone here - add rows if necessary			\$ -	\$ - Add description
65	Other Tax specific to ATSI zone here - add rows if necessary			\$ -	\$ - Add description
66	Other Tax specific to ATSI zone here - add rows if necessary			\$ -	\$ - Add description
67	Other Tax specific to ATSI zone here - add rows if necessary			\$ -	\$ - Add description
68				\$ -	\$ - sum of Other Taxes specific to ATSI zone
69	Other Taxes specific to AEP Zone				
70	Other Tax specific to AEP zone here - add rows if necessary			\$ -	\$ - Add description
71	Other Tax specific to AEP zone here - add rows if necessary			\$ -	\$ - Add description
72	Other Tax specific to AEP zone here - add rows if necessary			\$ -	\$ - Add description
73	Other Tax specific to AEP zone here - add rows if necessary			\$ -	\$ - Add description
74	Other Tax specific to AEP zone here - add rows if necessary			\$ -	\$ - Add description
75				\$ -	\$ - sum of Other Taxes specific to AEP zone
76	Other Taxes Specific to all zones				
77	Other Tax specific to all zones here - add rows if necessary			\$ -	\$ - Add description
78	Other Tax specific to all zones here - add rows if necessary			\$ -	\$ - Add description
79	Other Tax specific to all zones here - add rows if necessary			\$ -	\$ - Add description
80	Other Tax specific to all zones here - add rows if necessary			\$ -	\$ - Add description
81	Other Tax specific to all zones here - add rows if necessary			\$ -	\$ - Add description
82	Total Other Taxes Specific to all zones			\$ -	\$ - sum of Other Taxes specific to all zones

## AMP Transmission LLC

### Development of Margin Requirement

Line No.	Item	12-Month Period=	20XX
(a)	(b)		(c)
1	Debt Service Payments <sup>1</sup>		#N/A
2			
3	Less:		
4	Interest on Working Capital Loans (WP06b)		\$ -
5	Premium paid on Debt and included in debt service		\$ -
6	Other Adjustments needed to reflect only Debt Service on Assets		\$ -
7	Add Additional deductions to Debt Service Payments as needed		\$ -
8			
9	Net Debt Service Payments (line 1 - lines 4 thorough 7)		#N/A
10	Margin Factor (fixed)		40%
11	Margin Requirement (line 9 x line 10) - To H-32A line		#N/A
12			
13	Notes:		
14	1. Excludes any Debt Service related to Acquisition Adjustments if any per WP06		

## **ATTACHMENT 4**

### **Narrative Example of the Application of “Financial Year” and “Rate Year”**



NARRATIVE EXAMPLE:  
APPLICATION OF “FINANCIAL YEAR” AND “RATE YEAR”

Assume Financial Year 2022 is January 1 through December 31, 2022, and Rate Year 2022 is June 1, 2022 through May 31, 2023.

1. Not later than April 1, 2022, AMPT will post a projection of what it expects its transmission revenue requirement to be over the course of Financial Year 2022 (the Projected Transmission Revenue Requirement, or “PTRR”).
2. AMPT’s PTRR for Financial Year 2022 will be collected through charges assessed by PJM during Rate Year 2022 (*i.e.*, during the period 6/1/2022 – 5/31/2023).
3. Not later than April 1, 2024, AMPT will post an Annual Update that includes the following items:
  - a. AMPT’s Actual Transmission Revenue Requirement (ATRR) for Financial Year 2022, determined from data reported in AMPT’s FERC Form 1 document for calendar year 2022;
  - b. A comparison of AMPT’s ATRR in Financial Year 2022 with the revenues actually received by AMPT for charges billed during Rate Year 2022, and the amount by which the revenues received for charges billed during Rate Year 2022 exceed or are less than AMPT’s ATRR in Financial Year 2022 (“True-Up Adjustment Over/Under Recovery”);
  - c. A calculation of interest on the True-Up Adjustment Over/Under Recovery;
  - d. AMPT’s projection of its TRR in Financial Year 2024 (January 1 – December 31, 2024); and,
  - e. The calculation of AMPT’s PTRR to be collected through charges assessed during Rate Year 2024 (6/1/2024 – 5/31/2025) taking into account the factors listed in parts (a) through (d).
4. As a result of the foregoing, any True-Up Adjustment Over/Under Recovery during Rate Year 2022 will be flowed back to (or collected from) customers during Rate Year 2024.