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August 28, 2026

VIA ETARIFF

The Honorable Debbie-Anne A. Reese
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

RE: Grid Growth Ohio EHV, LLC and Grid Growth Ohio, LLC
Compliance Filing
Docket Nos. ER26-1655-___

Dear Secretary Reese:

In compliance with the Federal Energy Regulatory Commission's ("FERC" or "Commission") July 2, 2026 order issued in this proceeding,[1] Grid Growth Ohio EHV, LLC ("Grid Growth Ohio EHV") and Grid Growth Ohio, LLC ("Grid Growth Ohio") (each a "Company," and collectively "Grid Growth" or "Companies") hereby submit revisions to their formula rate protocols as directed by the Commission ("Compliance Filing").[2] Grid Growth requests that the Commission accept this Compliance Filing effective May 6, 2026, consistent with the effective date established in the Commission's July 2 Order.[3]

I. BACKGROUND

On March 6, 2026, pursuant to sections 205 and 219 of the Federal Power Act ("FPA")[4] and Part 35 of the Commission's regulations,[5] Grid Growth submitted a filing requesting: (i)

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[1] *Grid Growth Ohio, LLC*, 196 FERC ¶ 61,008 (2026) ("July 2 Order").

[2] *Id.* PP 76-80.

[3] *Id.* P 2. Pursuant to Order No. 714, this filing is submitted by PJM Interconnection, L.L.C. ("PJM") on behalf of Grid Growth Ohio EHV and Grid Growth Ohio as part of an XML filing package that conforms with the Commission's regulations. *See Elec. Tariff Filings*, Order No. 714, 124 FERC ¶ 61,270 (2008), *clarified,* Order No. 714-A, 147 FERC ¶ 61,115 (2014). PJM has agreed to make all filings on behalf of the PJM Transmission Owners in order to retain administrative control over the PJM Tariff. Thus, Grid Growth Ohio EHV and Grid Growth Ohio have requested PJM submit the proposed revisions to Attachment H-40B and Attachment H-41B in the eTariff system as part of PJM's electronic Intra PJM Tariff.

[4] 16 U.S.C. §§ 824d, 824s.

[5] 18 C.F.R. Pt. 35 (2025).

acceptance of a formula rate for each Company, consisting of a formula rate template ("Template") and implementation protocols ("Protocols"); (ii) approval of certain FPA section 219 transmission incentive rate treatments in connection with each Company's investment in the Grid Growth Project in the PJM Interconnection, L.L.C. ("PJM") region; (iii) authorization to replicate the Formula Rate and incentives granted for future affiliates formed to operate in PJM; and (iv) authorization to assign the approved incentives to any subsidiary of Grid Growth Ventures, LLC created to pursue and complete the Grid Growth Project.[6] Grid Growth requested that the Commission accept for filing the proposed Formula Rates, incentive rate treatments, and replication and assignment authorities effective May 6, 2026.[7]

On April 23, 2026, the Commission issued a letter informing Grid Growth that the Formula Rate Filing is deficient and additional information is required with respect to the Protocols.[8] On May 6, 2026, Grid Growth filed its response to the Deficiency Letter.[9]

On July 2, 2026, the Commission issued the July 2 Order, wherein the Commission, *inter alia*, granted the requested transmission incentive rate treatments effective July 3, 2026, accepted for filing the Formula Rate tariff records to be effective May 6, 2026, instituted a proceeding pursuant to FPA section 206 establishing hearing and settlement judge procedures with respect to the Template, and directed a compliance filing with respect to certain aspects of the Protocols.[10] Specifically, the Commission directed Grid Growth to submit a compliance filing within 60 days of the July 2 Order revising aspects of the following provisions of the Protocols: (1) sections IV.I and VIII.A, which define the scope of various FPA section 205 filings; (2) section III.A, which governs information exchange procedures; and (3) sections II.B.1, II.E.3, and VI.A, which address the Annual Update.[11] In addition, the Commission directed Grid Growth to add language to the Protocols that "indicates that posting information relevant to its revenue requirements to the PJM website will cause such information to be linked on PJM's OASIS."[12]

II. COMPLIANCE FILING

In compliance with the Commission's directives in the July 2 Order, Grid Growth proposes the following revisions to its Protocols.

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[6] Formula Rate Filing and Request for Authorization of Transmission Rate Incentives, Docket No. ER26-1655-000 (filed Mar. 6, 2026) ("Formula Rate Filing").

[7] *See id.*

[8] *Grid Growth Ohio EHV, LLC*, Docket No. ER26-1655-000 (Apr. 23, 2026) ("Deficiency Letter").

[9] Grid Growth Ohio EHV, LLC and Grid Growth Ohio, LLC, Response to Deficiency Letter, Docket No. ER26-1655-001 (filed May 6, 2026).

[10] July 2 Order, 196 FERC ¶ 61,008 at PP 2-3.

[11] *Id.*, 196 FERC ¶ 61,008 at PP 77, 78 n.106, 79.

[12] *Id.*, 196 FERC ¶ 61,008 at P 80.

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A. Scope of FPA section 205 Filings

The Commission directed Grid Growth to revise language in the Challenge Procedures and Formula Rate Inputs sections of the Protocols pertaining to the characterization of the scope of future FPA section 205 filings.[13] Specifically, the Commission found that the "proposed language in sections IV.I and VIII.A of the Protocols, which attempts to define the scope of various section 205 filings, is unjust and unreasonable."[14] Accordingly, consistent with the Commission's directive, Grid Growth proposes to delete the following sentence from Section IV.I: "~~Interested Parties may have the right to contest such filing(s), but the sole issue in any such limited Section 205 proceeding shall be whether the proposed limited change is just and reasonable, and it shall not address other aspects of the Formula Rate.~~"

Further, Grid Growth proposes to delete the last clause of the first sentence, as well as the second sentence, of Section VIII.A: "~~provided, however, that Grid Growth Ohio may at its discretion and at a time of its choosing, make a limited, single-issue Section 205 filing to revise the stated depreciation rates and/or amortization rates. All parties reserve the right to contest such filing(s), but the sole issue in any such limited Section 205 proceeding shall be whether such proposed change is just and reasonable, and it shall not address other aspects of the Formula Rate.~~"

B. Follow-Up Information Requests

The Commission also directed Grid Growth to remove the requirement that follow-up information requests be limited to clarification or additional information regarding Grid Growth's responses to information and document requests issued to Grid Growth on or before August 31.[15] In accordance with this directive, Grid Growth proposes to delete the last clause of the second sentence in Section III.A: "~~but such requests must be specifically limited to clarification or additional information regarding Grid Growth Ohio EHV's responses provided to any sets of information and document requests issued to Grid Growth Ohio EHV on or before August 31.~~"

C. Protective Agreement in Annual Update

The Commission also directed Grid Growth to remove references to Grid Growth's use of a Protective Agreement and Non-Disclosure Certificate as part of the Annual Update process in Sections II.B.1, II.E.3 and VI.A of the Protocols.[16] Grid Growth has deleted these references from the indicated sections in the revised Protocols.

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13 July 2 Order, 196 FERC ¶ 61,008 at P 77 (discussing Sections IV.I and VIII.A of the Protocols).

14 *Id.* (citing *ATX Sw., LLC*, 152 FERC ¶ 61,193 at P 85 (2015)).

15 *Id.* P 78.

16 *Id.* P 79.

D. Posting Information to OASIS

Finally, in regard to Grid Growth's annual posting of its revenue requirements and relevant information on the PJM website, the Commission directed that language be added to the Protocols that "indicates that posting information relevant to [Grid Growth's] revenue requirements to the PJM website will cause such information to be linked on PJM's OASIS."[17] Accordingly, where applicable throughout the Protocols, Grid Growth has added a footnote reference to each instance of the phrase "PJM website" that explains that Grid Growth's posting of revenue requirement information to the PJM website will cause such information to be accessible via PJM's OASIS at the "Transmission Owner Formula Rates" link on OASIS.

III. 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,[18] PJM will post a copy of this filing to the FERC filings section of its internet site, located at the following link: https://www.pjm.com/library/filing-order 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[19] 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.

IV. CONTENTS OF FILING

The following documents are included in this filing:

- This transmittal letter;
- Attachment A – Clean Implementation Protocols for Grid Growth Ohio EHV, LLC, and Grid Growth Ohio, LLC; and
- Attachment B – Marked Implementation Protocols for Grid Growth Ohio EHV, LLC, and Grid Growth Ohio, LLC.

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[17] *Id.* P 80.

[18] 18 C.F.R. §§ 35.2(e) and 385.2010(f)(3).

[19] PJM already maintains, updates and regularly uses e-mail lists for all PJM members and affected state commissions.

V. CONCLUSION

For the reasons set forth above, Grid Growth respectfully requests that the Commission accept this Compliance Filing, effective May 6, 2026.

Respectfully submitted,

/s/ Miles H. Kiger
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Dated: August 28, 2026

Counsel for Grid Growth Ohio EHV, LLC and Grid Growth Ohio, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of August, 2026, I have served a copy of the foregoing filing on the official service lists compiled by the Office of the Secretary for the captioned proceedings.

/s/ Daryl A. Bascus
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ATTACHMENT A

ATTACHMENT H-40B

Formula Rate Implementation Protocols
Grid Growth Ohio EHV, LLC ("Grid Growth Ohio EHV")

ANNUAL TRUE-UP, INFORMATION EXCHANGE,
AND CHALLENGE PROCEDURES

Definitions

"Actual Transmission Revenue Requirement" or "ATRR" means the actual net transmission revenue requirement of Grid Growth Ohio EHV calculated and posted on the PJM website[1] no later than June 15 of each year subsequent to calendar year 2026 for the immediately preceding calendar year in accordance with Grid Growth Ohio EHV's Formula Rate and based upon Grid Growth Ohio EHV's actual costs and expenditures.

"Annual Update" means Grid Growth Ohio EHV's ATRR for the preceding calendar year, as well as the True-up for the prior Rate Year, as posted on or before June 15 of each year.

"Formal Challenge" means a written challenge to an Annual Update or Projected Transmission Revenue Requirement submitted to the Federal Energy Regulatory Commission (the "Commission" or "FERC") as provided in Section IV below.

"Formula Rate" means the collection of formulas and worksheets included as Attachment H-40A of the PJM Tariff.

"Informational Filing" means the informational filing to FERC containing Grid Growth Ohio EHV's, as applicable: (1) the PTRR for the upcoming Rate Year, as filed on or before October 31 of each year, and (2) the ATRR for the preceding calendar year, as well as its related True-up to the PTRR for the respective Rate Year, as filed on or before June 15 of each year.

"Interested Parties" include, but are not limited to, customers under the PJM Tariff, state utility regulatory commissions, the Organization of PJM States, Inc., consumer advocacy agencies, state attorneys general, and any party to any docket assigned by the Commission to Grid Growth Ohio EHV's Formula Rate Filing and Annual Update.

"PJM Tariff' means the Open Access Transmission Tariff of the PJM Interconnection, L.L.C.

"Preliminary Challenge" means a written challenge to the Annual Update or Projected Transmission Revenue Requirement submitted to Grid Growth Ohio EHV as provided in Section IV below.

"Projected Transmission Revenue Requirement" or "PTRR" means the projected net transmission revenue requirement of Grid Growth Ohio EHV calculated for the forthcoming Rate Year, as well as, where applicable, the most recently calculated True-up, with interest, to be posted on the PJM

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[1] The posting of revenue requirement information to the PJM website will cause such information to be accessible via PJM's OASIS at the "Transmission Owner Formula Rates" link on OASIS.

website[2] no later than October 31 of each year for rates effective the next calendar year starting January 1.

"Protective Agreement and Non-Disclosure Certificate" means the agreement and certificate executed by Interested Parties and their representatives for a Rate Year in order to obtain access to material that Grid Growth Ohio EHV deems confidential or that contains Critical Energy Infrastructure Information as that term is defined in 18 C.F.R. § 388.113(c)(1) (2024).

"Protocols" means these Protocols, included as Attachment H-40B of the PJM Tariff.

"Publication Date" means the date on which the Annual Update is posted on the PJM website.[3]

"Rate Year" means the twelve consecutive month period that begins on January 1 and continues through December 31.

"Transmission Provider" means PJM Interconnection, L.L.C., or its successor or assignee.

"True-up" means the difference between the revenues received by Grid Growth Ohio EHV corresponding to the rate effective period of the PTRR (net of the True-up from the prior year) and the ATRR, for the same Rate Year, which shall be provided in the Annual Update on or before June 15 of the year subsequent to the Rate Year. The True-up will be a component of the PTRR.

Section I. Applicability

The following procedures shall apply to Grid Growth Ohio EHV's calculation of its Actual Transmission Revenue Requirement, True-up, and Projected Transmission Revenue Requirement.

Section II. Annual Update and Projected Transmission Revenue Requirement

A. On or before June 15 of each year subsequent to calendar year 2026, commencing at the time that Grid Growth Ohio EHV's formula rate is initially populated, Grid Growth Ohio EHV shall determine its Annual Update for the immediately preceding calendar year under Attachment H-40A and Section VII of these Protocols, including calculation of the True-up to be included in its PTRR for the subsequent Rate Year.

B. On or before June 15 of each year subsequent to calendar year 2026, commencing at the time that Grid Growth Ohio EHV's formula rate is initially populated, Grid Growth Ohio EHV shall:

1. provide its Annual Update for the immediately preceding calendar year to PJM and cause such information to be posted on the PJM website;[4] and

[2] *See* note 1.

[3] *See* note 1.

[4] *See* note 1.

2. provide notice of such posting via the e-mail exploder list for Grid Growth Ohio EHV.

C. Commencing at the time that Grid Growth Ohio EHV's formula rate is initially populated, on or before October 31, Grid Growth Ohio EHV shall:

1. provide its PTRR to PJM and cause such information to be posted on the PJM website, in both a Portable Document Format ("PDF") and fully-functioning Excel file, and

2. provide notice of such posting via the e-mail exploder list for Grid Growth Ohio EHV.

D. If transmission plant is projected to be placed in service (PTRR) or actually placed in service (ATRR) in the respective rate period, at an amount other than on a historic cost basis (e.g., fair value adjustments), Grid Growth Ohio EHV will provide a worksheet identifying such transmission plant and a narrative explanation of the individual impact of such items to the Annual Update.

E. The ATRR shall:

1. Include a workable data-populated version of the Formula Rate template and underlying work papers in Excel format with all formulas and links intact;

2. Be based on Grid Growth Ohio EHV's FERC Form No. 1 for the prior calendar year;

3. Provide the Formula Rate calculations and all inputs thereto, as well as supporting documentation and work papers for data that are used in the ATRR that are not otherwise available in the FERC Form No. ls;

4. Provide sufficient information to enable Interested Parties to replicate the calculation of the ATRR results from the FERC Form No. ls;

5. Identify any changes in the formula references (page and line numbers) to the FERC Form No. ls;

6. Identify and, to the extent not explained in a worksheet included in the ATRR, explain, all material adjustments made to the FERC Form No. 1 data in determining formula inputs, including relevant footnotes to the FERC Form No. ls and any adjustments not shown in the FERC Form No. ls;

7. Provide underlying data for Formula Rate inputs that provide greater granularity than is required for the FERC Form No. 1;

8. As part of the ATRR open meeting, Grid Growth Ohio EHV shall provide a summary of the actual year results to the PTRR for the same rate period, to accompany further discussion of key drivers of the ATRR and PTRR.

9. With respect to any change in accounting that affects inputs to the Formula Rate or the resulting charges billed under the Formula Rate ("Accounting Change"):

   a. Identify any Accounting Change, including:

      i. the initial adoption of a new 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 affect the ATRR and True-up calculation;

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

      v. changes to income tax elections; and

      vi. the initial implementation of accounting changes in the reporting of the FERC Form No. 1 accounts from the prior year to the current year to the extent such change(s) affect(s) the Formula Rate revenue requirement: changes in (1) FERC's Uniform System of Accounts, (2) FERC Form No. 1 reporting requirements as applicable, (3) any FERC ratemaking orders applicable to the Formula Rate, and (4) the accounting policies of Grid Growth Ohio EHV.

   b. Identify items included in the ATRR 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 ATRR;

   d. Provide, for each Accounting Change, a narrative explanation of the individual impact of such change on the ATRR; and

10. Include for the applicable Rate Year the following information related to affiliate cost allocation: (A) a detailed description of the methodologies used to allocate and directly assign costs between Grid Growth Ohio EHV and its affiliates by service category and function, including any changes to such cost allocation methodologies from the prior year, and the reasons and justification for those changes; and (B) the magnitude of such costs that have been allocated or directly assigned between Grid Growth Ohio EHV and each affiliate by service category or function.

F. It is the intent of the Formula Rate, including the supporting explanations and allocation described therein, that each input to the Formula Rate will be either taken directly from FERC Form No. 1 or reconcilable to FERC Form No. 1 by the application of clearly identified and supported information. If the referenced form is superseded, the successor form(s) shall be utilized and supplemented as necessary to provide equivalent information as that provided in the superseded form. If the referenced form(s) is (are) discontinued, equivalent information as that provided in the discontinued form(s) shall be utilized.

G. The PTRR shall:

1. Include a workable data-populated version of the Formula Rate template and underlying work papers in Excel format with all formulas and links intact;

2. Provide the Formula Rate calculations and all inputs thereto, as well as supporting documentation and work papers for data that are used in the PTRR;

3. Provide sufficient information to enable Interested Parties to replicate the calculation of the PTRR. If transmission plant is projected to be placed in service (PTRR) or actually placed in service (ATRR) in the respective rate period at an amount other than on a historic cost basis (e.g., fair value adjustments), Grid Growth Ohio EHV will provide a worksheet identifying such transmission plant and a narrative explanation of the individual impact of such items to the Annual Update;

4. With respect to any Accounting Change:

   a. Identify any Accounting Change, including:

      i. the initial adoption of a new 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 affect the PTRR calculation;

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

      v. changes to income tax elections;

      vi. the initial implementation of accounting changes in the reporting of the FERC Form 1 accounts from the prior year to the current year to the extent such change(s) affect(s) the Formula Rate revenue requirement: changes in (1) FERC's Uniform System of Accounts, (2) FERC Form No. 1 reporting requirements as applicable, (3) any FERC ratemaking orders applicable to the Formula Rate, and (4) the accounting policies of Grid Growth Ohio EHV.

b. Identify items included in the PTRR 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 PTRR; and

d. Provide, for each Accounting Change, a narrative explanation of the individual impact of such change on the PTRR.

H. If the date for posting the Annual Update or PTRR falls on a weekend or a holiday recognized by FERC, then the posting shall be due on the next business day. The date on which posting of the Annual Update occurs shall be that year's Publication Date. Any delay in the Publication Date or in the posting of the PTRR will result in an equivalent extension of time for the submission of information requests discussed in Section III of these Protocols.

I. Commencing at the time that Grid Growth Ohio EHV's formula rate is initially populated, Grid Growth Ohio EHV shall hold an open meeting among Interested Parties ("Annual Update Meeting"), to be conducted via Internet webcast, no earlier than ten (10) business days following the Publication Date and no later than July 15. No fewer than seven (7) calendar days prior to such Annual Update Meeting, Grid Growth Ohio EHV shall provide notice on PJM's website of the time and date of the Annual Update Meeting, and shall provide notice of the posting via the e-mail exploder list for Grid Growth Ohio EHV. The Annual Update Meeting shall: (i) permit Grid Growth Ohio EHV to explain and clarify its ATRR and True-up; and (ii) provide Interested Parties an opportunity to seek information and clarifications from Grid Growth Ohio EHV about the ATRR and True-up.

J. Commencing at the time that Grid Growth Ohio EHV's formula rate is initially populated, Grid Growth Ohio EHV shall hold an open meeting among Interested Parties ("Annual Projected Rate Meeting"), to be conducted via Internet webcast, no earlier than seven (7) business days following the posting of the PTRR (as described in Section II.C of these Protocols) and no later than November 30. No fewer than seven (7) calendar days prior to such Annual Projected Rate Meeting, Grid Growth Ohio EHV shall provide notice on PJM's website of the time and date of the Annual Projected Rate Meeting, and shall provide notice of the posting via the e-mail exploder list for Grid Growth Ohio EHV. The Annual Projected Rate Meeting shall: (i) permit Grid Growth Ohio EHV to explain and clarify its PTRR and (ii) provide Interested Parties an opportunity to seek information and clarifications from Grid Growth Ohio EHV about the PTRR.

Section III. Information Exchange Procedures

Each Annual Update and PTRR shall be subject to the following information exchange procedures ("Information Exchange Procedures"):

A. Commencing at the time that Grid Growth Ohio EHV's formula rate is initially populated, Interested Parties shall have until August 31 following the Annual Update posting date (unless such period is extended with the written consent of Grid Growth Ohio EHV or by

FERC order) to serve a first set of information and document requests on Grid Growth Ohio EHV pertaining to the Annual Update. Interested parties shall have until January 15 to serve follow-up information and document requests pertaining to the Annal Update (together with the August 31 deadline, the "ATRR Information Exchange Period").

Interested Parties shall have until January 15 following the PTRR posting date (unless such period is extended with the written consent of Grid Growth Ohio EHV or by FERC order) to serve reasonable information and document requests on Grid Growth Ohio EHV pertaining to the PTRR ("PTRR Information Exchange Period"). If August 31 or January 15 falls on a weekend or a holiday recognized by FERC, the deadline for submitting all information and document requests shall be extended to the next business day. Such information and document requests shall be limited to what is necessary to determine:

1. the extent or effect of an Accounting Change on the inputs to the Formula Rate or the resulting charges under the Formula Rate;

2. whether the ATRR or PTRR fails to include data properly recorded in accordance with these Protocols;

3. the proper application of the Formula Rate and procedures in these Protocols;

4. the accuracy of data and consistency with the Formula Rate of the calculations shown in the ATRR or PTRR;

5. the prudence of actual costs and expenditures included in the ATRR or the reasonableness of projected costs and expenditures included in the PTRR;

6. the effect of any change to the underlying Uniform System of Accounts or FERC Form No. 1; or

7. any other information that may reasonably have a substantive effect on the calculation of the charge pursuant to the Formula Rate.

The information and document requests shall not be directed to ascertaining whether the Formula Rate is just and reasonable.

B. Grid Growth Ohio EHV shall make a good faith effort to respond to any information and document request within fifteen (15) business days of receipt of such request. Commencing at the time that Grid Growth Ohio EHV's formula rate is initially populated, Grid Growth Ohio EHV shall respond to all information and document requests by no later than February 25 following the Publication Date, unless the ATRR Information Exchange Period or PTRR Information Exchange Period is extended with written consent of Grid Growth Ohio EHV or by FERC order.

C. Grid Growth Ohio EHV shall not claim that responses to information and document requests provided pursuant to these Protocols are subject to any settlement privilege in any proceeding addressing Grid Growth Ohio EHV's Annual Update or PTRR, and such responses may be included in any Formal Challenge or other submittal addressing Grid Growth Ohio EHV's Annual Update or PTRR.

D. Grid Growth Ohio EHV shall use best efforts to timely notify the proponent of an Information Request if all or any part of an Information Request is unclear or the subject matter is outside the scope of Section III.B. If the parties are unable to resolve any dispute regarding an information request, the matter may be referred to the FERC Dispute Resolution Service.

Section IV. Challenge Procedures

A. Interested Parties shall have until March 31 following the Publication Date (unless such period is extended with the written consent of Grid Growth Ohio EHV or by FERC order) ("Review Period") to review the inputs, supporting explanations, allocations and calculations and to notify Grid Growth Ohio EHV in writing, which may be made electronically, of any specific Preliminary Challenges to the Annual Update or PTRR. If the final day of the Review Period falls on a holiday recognized by FERC, the deadline for submitting all Preliminary Challenges shall be extended to the next business day. An Interested Party may not pursue a Formal Challenge unless it submitted a Preliminary Challenge on some issue (which may be different from the Formal Challenge issue) during the applicable Review Period. Failure to raise an issue in one year's Formal Challenge shall not bar the lodging of that issue as related to a subsequent Annual Update or PTRR. This Section IV.A in no way shall affect a party's rights under Federal Power Act ("FPA") section 206 as set forth in Section IV.I of these Protocols.

B. Preliminary Challenges shall be subject to the resolution procedures and limitations in this Section IV. Preliminary Challenges shall be filed pursuant to these Protocols and shall satisfy all of the following requirements.

1. A party submitting a Preliminary Challenge to Grid Growth Ohio EHV must specify the inputs, supporting explanations, allocations, calculations, or other information to which it objects, and provide an explanation and documents to support its challenge.

2. Grid Growth Ohio EHV shall make a good faith effort to respond to any Preliminary Challenge within twenty (20) business days of written receipt of such challenge.

3. Grid Growth Ohio EHV, and where applicable, PJM, shall appoint a senior representative to work with each party that submitted a Preliminary Challenge (or its representative) toward a resolution of the challenge.

4. If Grid Growth Ohio EHV disagrees with such challenge, they will provide the Interested Party(ies) with a written explanation supporting the inputs, supporting explanations, allocations, calculations, or other information.

5. No Preliminary Challenge may be submitted after March 31, and Grid Growth Ohio EHV must respond to all Preliminary Challenges by no later than April 30 unless

the Review Period is extended with written consent of Grid Growth Ohio EHV or by FERC order, or as provided in Section IV.A above.

6. Grid Growth Ohio EHV will serve all Preliminary Challenges and its response(s) to such Preliminary Challenges upon any Interested Party that requests such service, subject to the protection of any confidential information contained in such Preliminary Challenges or responses, as needed, under the Protective Agreement and Non-Disclosure Certificate.

C. Formal Challenges shall be subject to the resolution procedures and limitations in this Section IV. Formal Challenges shall be filed pursuant to these Protocols and shall satisfy all of the following requirements.

1. A Formal Challenge shall:

a. Clearly identify the action or inaction which is alleged to violate the filed Formula Rate or these Protocols;

b. Explain how the action or inaction violates the filed Formula Rate or these Protocols;

c. 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:

i. the extent or effect of an Accounting Change;

ii. whether the ATRR or PTRR 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 charges shown in the ATRR or PTRR;

v. the prudence of actual costs and expenditures;

vi. the effect of any change to the underlying Uniform System of Accounts or FERC Form No. 1; or

vii. any other information that may reasonably have a substantive effect on the calculation of the charge pursuant to the Formula Rate.

d. 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 challenged action or inaction;

e. State whether the claim(s) 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;

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

g. 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

2. Service. Any person filing a Formal Challenge must serve a copy of such Formal Challenge on Grid Growth Ohio EHV. Service to Grid Growth Ohio EHV must be simultaneous with filing at FERC. Simultaneous service can be accomplished by electronic mail in accordance with 18 C.F.R. § 385.2010, express delivery, or messenger. A party filing a Formal Challenge shall serve the individual listed as the contact person on Grid Growth Ohio EHV's Informational Filing required under Section VI of these Protocols.

D. Preliminary and Formal Challenges shall be limited to all issues that may be necessary to determine:

1. the extent or effect of an Accounting Change;

2. whether the ATRR or PTRR fails to include data properly recorded in accordance with these Protocols, or includes data not properly recorded in accordance with these Protocols;

3. the proper application of the Formula Rate and procedures in these Protocols;

4. the accuracy of data and consistency with the Formula Rate of the calculations shown in the ATRR and PTRR;

5. the prudence of actual costs and expenditures included as inputs to the Formula Rate;

6. the reasonableness of any projection that forms a basis of the PTRR;

7. the effect of any change to the underlying Uniform System of Accounts or FERC Form No. 1; or

8. any other information that may reasonably have a substantive effect on the calculation of the charge pursuant to the Formula Rate.

E. Any changes or adjustments to the ATRR and PTRR resulting from the information exchange and Preliminary Challenge processes that are agreed to by Grid Growth Ohio EHV will be reported in the applicable Informational Filing required pursuant to Section

VI of these Protocols. Any such changes or adjustments agreed to by Grid Growth Ohio EHV on or before December 1 will be reflected in the PTRR for the upcoming Rate Year. Any changes or adjustments agreed to by Grid Growth Ohio EHV after December 1 will be reflected in the following year's Annual Update, as discussed in Section V of these Protocols.

F. An Interested Party shall have until June 1 following the Review Period (unless such date is extended with the written consent of Grid Growth Ohio EHV to continue efforts to resolve the Preliminary Challenge) to make a Formal Challenge with FERC, which shall be served on Grid Growth Ohio EHV on the date of such filing as specified in Section IV.C.2 above. A Formal Challenge shall be filed in the same docket as Grid Growth Ohio EHV's Informational Filing discussed in Section VI of these Protocols. Grid Growth Ohio EHV shall respond to the Formal Challenge by the deadline established by FERC.

G. In any proceeding initiated by FERC concerning the Annual Update or PTRR or in response to a Formal Challenge, Grid Growth Ohio EHV shall bear the burden, consistent with FPA section 205, of proving 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 the Formula Rate. Nothing herein is intended to alter the burdens applied by FERC with respect to prudence challenges.

H. Except as specifically provided herein, nothing herein shall be deemed to limit in any way the right of Grid Growth Ohio EHV to file unilaterally, pursuant to FPA section 205 and the regulations thereunder, to change these Protocols, the Formula Rate, or any of its inputs (including, but not limited to, rate of return and transmission incentive rate treatment), or to replace the Formula Rate with a stated rate, or the right of any other party to request such changes pursuant to FPA section 206.

I. Grid Growth Ohio EHV reserves the right to file under FPA section 205: (i) to modify the stated values for amortization and depreciation rates in the filed template, (ii) to reflect ministerial changes to the FERC Form 1 reporting requirements (i.e., changes in account descriptions or line numbers that do not reflect changes in the nature or type of costs or expenses recorded therein), or (iii) to seek recovery of prudently-incurred abandoned plant expenses.

J. Any Interested Party seeking changes to the application of the Formula Rate due to a change in the Uniform System of Accounts or FERC Form No. 1 shall first raise the matter with Grid Growth Ohio EHV in accordance with this Section IV before pursuing a Formal Challenge.

Section V. Changes to Actual Transmission Revenue Requirement or Projected Transmission Revenue Requirement

Except as provided in Section IV.E of these Protocols, any changes to the data inputs, including but not limited to revisions to Grid Growth Ohio EHV's FERC Form No. 1, or as the result of any FERC proceeding to consider the ATRR or PTRR, or as a result of the procedures set forth herein, shall be incorporated into the Formula Rate and the charges produced by the Formula Rate in the

PTRR for the next Rate Year. This true-up mechanism shall apply in lieu of mid-Rate Year adjustments. Interest on any refund or surcharge shall be calculated in accordance with the procedures outlined in Section VII of these Protocols.

Section VI. Informational Filings

A. Commencing at the time that Grid Growth Ohio EHV's formula rate is initially populated, Grid Growth Ohio EHV shall submit to FERC informational filings (Informational Filing) of its PTRR for the Rate Year or ATRR for the Rate Year as applicable under the respective procedures set forth in Section II. The relevant Informational Filing must include information that is reasonably necessary to determine:

1. that input data to the Formula Rate are properly recorded in any underlying work papers;

2. that Grid Growth Ohio EHV has properly applied the Formula Rate and these Protocols;

3. the accuracy of data and the consistency with the Formula Rate of the transmission revenue requirement and rates under review;

4. the extent of Accounting Changes that affect Formula Rate inputs; and

5. the reasonableness of projected costs.

The Informational Filing must also describe any corrections or adjustments made during the period since the Publication Date, and must describe all aspects of the Formula Rate or its inputs that are the subject of an ongoing dispute under the Preliminary Challenge or Formal Challenge procedures.

Finally, the Informational Filing shall include for the applicable Rate Year the following information related to affiliate cost allocation: a detailed description of the methodologies used to allocate and directly assign costs between Grid Growth Ohio EHV and its affiliates by service category or function, including any changes to such cost allocation methodologies from the prior Rate Year, and the reasons and justification for those changes; the magnitude of such costs that have been allocated or directly assigned between Grid Growth Ohio EHV and each affiliate by service category or function; and a copy of any service agreement between Grid Growth Ohio EHV and any affiliate that went into effect during the Rate Year.

On the date of submission to FERC, Grid Growth Ohio EHV shall provide notice of the Informational Filing via the e-mail exploder list for Grid Growth Ohio EHV and by posting the docket number assigned to Grid Growth Ohio EHV's relevant Informational Filing on the PJM website. [5]

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[5] *See* note 1.

B. Any challenges to the implementation of the Formula Rate must be made through the challenge procedures described in Section IV of these Protocols or in a separate complaint proceeding, and not in response to the Informational Filing.

Section VII. Calculation of True-up

The True-up will be determined in the following manner:

A. As part of the Annual Update for each Rate Year, Grid Growth Ohio EHV shall determine the difference between the revenues received by Grid Growth Ohio EHV corresponding to the rate effective period based on the PTRR for the Rate Year (net of the True-up from the prior year) and the ATRR for the same Rate Year based on actual cost data as reflected in its FERC Form No. 1. The True-up will be determined as follows:

1. The ATRR for the previous Rate Year as determined using Grid Growth Ohio EHV's completed FERC Form No. 1 report shall be compared to the revenues received by Grid Growth Ohio EHV corresponding to the rate effective period based on the PTRR (net of the True-up from the prior year) for that same Rate Year ("True-up Year") to determine any excess or shortfall in the revenues received by Grid Growth Ohio EHV corresponding to the rate effective period in the True-up Year. The revenue excess or shortfall determined by this comparison shall constitute the "True-up."

2. Interest on any True-up shall be based on the interest rate equal to the interest rate determined by 18 C.F.R. § 35.19a. Interest rates will be used to calculate the time value of money for the period that the True-up exists. The interest rate to be applied to the True-up will be determined using the average rate for the twenty (20) months preceding September 1 of the current year. Interest on refunds and surcharges shall be compounded on a quarterly basis.

B. Grid Growth Ohio EHV will post on PJM's website all information relating to the True-up as part of the Annual Update. As provided in Section II.B of these Protocols, Grid Growth Ohio EHV shall provide its Annual Update for the immediately preceding calendar year to PJM and cause such information to be posted on the PJM website on or before June 15 of each year subsequent to calendar year 2026.

Section VIII. Formula Rate Inputs

A. Fixed components to the Formula Rate: for (i) rate of return on common equity; and (ii) depreciation and/or amortization rates, the values in the Formula Rate shall be stated values specified in the Formula Rate and may be changed only pursuant to a FPA section 205 or section 206 proceeding.

B. Unpopulated Formula Rate line items: with respect to line items in the Formula Rate that are not currently populated with non-zero numerical values because FERC policy requires prior authorization for recovery of the underlying costs or because, due to the nature of the associated functional activities, such costs are not considered part of Grid Growth Ohio EHV's transmission-related revenue requirement (but not line items that are zero values in a particular Rate Year for the sole reason that no such costs or revenues were incurred or revenues received or projected to be incurred or received during the Rate Year), such line items shall not be populated with non-zero values except as may be authorized following a FPA section 205 or section 206 proceeding.

Section IX. Competitive Concessions

A. For transmission development projects assigned to Grid Growth Ohio EHV as a result of the PJM competitive proposal process, Grid Growth Ohio EHV may, in its sole discretion, agree with PJM to apply a competitive concession that will result in a lower Net Revenue Requirement on a project-specific basis than that which would otherwise be produced by the Grid Growth Ohio EHV Attachment H-40A Formula Rate. Any competitive concession will appear as a zero or negative input to the formula, and will be determined on a project-specific basis using a workpaper that will be provided to Interested Parties as supporting documentation for each Grid Growth Ohio EHV Annual Update.

ATTACHMENT H-41B

Formula Rate Implementation Protocols
Grid Growth Ohio, LLC ("Grid Growth Ohio")

ANNUAL TRUE-UP, INFORMATION EXCHANGE, AND CHALLENGE PROCEDURES

Definitions

"Actual Transmission Revenue Requirement" or "ATRR" means the actual net transmission revenue requirement of Grid Growth Ohio calculated and posted on the PJM website[1] no later than June 15 of each year subsequent to calendar year 2026 for the immediately preceding calendar year in accordance with Grid Growth Ohio's Formula Rate and based upon Grid Growth Ohio's actual costs and expenditures.

"Annual Update" means Grid Growth Ohio's ATRR for the preceding calendar year, as well as the True-up for the prior Rate Year, as posted on or before June 15 of each year.

"Formal Challenge" means a written challenge to an Annual Update or Projected Transmission Revenue Requirement submitted to the Federal Energy Regulatory Commission (the "Commission" or "FERC") as provided in Section IV below.

"Formula Rate" means the collection of formulas and worksheets included as Attachment H-41A of the PJM Tariff.

"Informational Filing" means the informational filing to FERC containing Grid Growth Ohio's, as applicable: (1) the PTRR for the upcoming Rate Year, as filed on or before October 31 of each year, and (2) the ATRR for the preceding calendar year, as well as its related True-up to the PTRR for the respective Rate Year, as filed on or before June 15 of each year.

"Interested Parties" include, but are not limited to, customers under the PJM Tariff, state utility regulatory commissions, the Organization of PJM States, Inc., consumer advocacy agencies, state attorneys general, and any party to any docket assigned by the Commission to Grid Growth Ohio's Formula Rate Filing and Annual Update.

"PJM Tariff' means the Open Access Transmission Tariff of the PJM Interconnection, L.L.C.

"Preliminary Challenge" means a written challenge to the Annual Update or Projected Transmission Revenue Requirement submitted to Grid Growth Ohio as provided in Section IV below.

"Projected Transmission Revenue Requirement" or "PTRR" means the projected net transmission revenue requirement of Grid Growth Ohio calculated for the forthcoming Rate Year, as well as, where applicable, the most recently calculated True-up, with interest, to be posted on the PJM

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1 The posting of revenue requirement information to the PJM website will cause such information to be accessible via PJM's OASIS at the "Transmission Owner Formula Rates" link on OASIS.

website[2] no later than October 31 of each year for rates effective the next calendar year starting January 1.

"Protective Agreement and Non-Disclosure Certificate" means the agreement and certificate executed by Interested Parties and their representatives for a Rate Year in order to obtain access to material that Grid Growth Ohio deems confidential or that contains Critical Energy Infrastructure Information as that term is defined in 18 C.F.R. § 388.113(c)(1) (2024).

"Protocols" means these Protocols, included as Attachment H-41B of the PJM Tariff.

"Publication Date" means the date on which the Annual Update is posted on the PJM website.[3]

"Rate Year" means the twelve consecutive month period that begins on January 1 and continues through December 31.

"Transmission Provider" means PJM Interconnection, L.L.C., or its successor or assignee.

"True-up" means the difference between the revenues received by Grid Growth Ohio corresponding to the rate effective period of the PTRR (net of the True-up from the prior year) and the ATRR, for the same Rate Year, which shall be provided in the Annual Update on or before June 15 of the year subsequent to the Rate Year. The True-up will be a component of the PTRR.

Section I. Applicability

The following procedures shall apply to Grid Growth Ohio's calculation of its Actual Transmission Revenue Requirement, True-up, and Projected Transmission Revenue Requirement.

Section II. Annual Update and Projected Transmission Revenue Requirement

A. On or before June 15 of each year subsequent to calendar year 2026, commencing at the time that Grid Growth Ohio's formula rate is initially populated, Grid Growth Ohio shall determine its Annual Update for the immediately preceding calendar year under Attachment H-41A and Section VII of these Protocols, including calculation of the True-up to be included in its PTRR for the subsequent Rate Year.

B. On or before June 15 of each year subsequent to calendar year 2026, commencing at the time that Grid Growth Ohio's formula rate is initially populated, Grid Growth Ohio shall:

1. provide its Annual Update for the immediately preceding calendar year to PJM and cause such information to be posted on the PJM website;[4] and

2. provide notice of such posting via the e-mail exploder list for Grid Growth Ohio.

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[2] *See* note 1.

[3] *See* note 1.

[4] *See* note 1.

C. Commencing at the time that Grid Growth Ohio's formula rate is initially populated, on or before October 31, Grid Growth Ohio shall:

1. provide its PTRR to PJM and cause such information to be posted on the PJM website, in both a Portable Document Format ("PDF") and fully-functioning Excel file, and

2. provide notice of such posting via the e-mail exploder list for Grid Growth Ohio.

D. If transmission plant is projected to be placed in service (PTRR) or actually placed in service (ATRR) in the respective rate period, at an amount other than on a historic cost basis (e.g., fair value adjustments), Grid Growth Ohio will provide a worksheet identifying such transmission plant and a narrative explanation of the individual impact of such items to the Annual Update.

E. The ATRR shall:

1. Include a workable data-populated version of the Formula Rate template and underlying work papers in Excel format with all formulas and links intact;

2. Be based on Grid Growth Ohio's FERC Form No. 1 for the prior calendar year;

3. Provide the Formula Rate calculations and all inputs thereto, as well as supporting documentation and work papers for data that are used in the ATRR that are not otherwise available in the FERC Form No. ls;

4. Provide sufficient information to enable Interested Parties to replicate the calculation of the ATRR results from the FERC Form No. ls;

5. Identify any changes in the formula references (page and line numbers) to the FERC Form No. ls;

6. Identify and, to the extent not explained in a worksheet included in the ATRR, explain, all material adjustments made to the FERC Form No. 1 data in determining formula inputs, including relevant footnotes to the FERC Form No. ls and any adjustments not shown in the FERC Form No. ls;

7. Provide underlying data for Formula Rate inputs that provide greater granularity than is required for the FERC Form No. 1;

8. As part of the ATRR open meeting, Grid Growth Ohio shall provide a summary of the actual year results to the PTRR for the same rate period, to accompany further discussion of key drivers of the ATRR and PTRR.

9. With respect to any change in accounting that affects inputs to the Formula Rate or the resulting charges billed under the Formula Rate ("Accounting Change"):

a. Identify any Accounting Change, including:

i. the initial adoption of a new 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 affect the ATRR and True-up calculation;

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

v. changes to income tax elections; and

vi. the initial implementation of accounting changes in the reporting of the FERC Form No. 1 accounts from the prior year to the current year to the extent such change(s) affect(s) the Formula Rate revenue requirement: changes in (1) FERC's Uniform System of Accounts, (2) FERC Form No. 1 reporting requirements as applicable, (3) any FERC ratemaking orders applicable to the Formula Rate, and (4) the accounting policies of Grid Growth Ohio.

b. Identify items included in the ATRR 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 ATRR;

d. Provide, for each Accounting Change, a narrative explanation of the individual impact of such change on the ATRR; and

10. Include for the applicable Rate Year the following information related to affiliate cost allocation: (A) a detailed description of the methodologies used to allocate and directly assign costs between Grid Growth Ohio and its affiliates by service category and function, including any changes to such cost allocation methodologies from the prior year, and the reasons and justification for those changes; and (B) the magnitude of such costs that have been allocated or directly assigned between Grid Growth Ohio and each affiliate by service category or function.

F. It is the intent of the Formula Rate, including the supporting explanations and allocation described therein, that each input to the Formula Rate will be either taken directly from FERC Form No. 1 or reconcilable to FERC Form No. 1 by the application of clearly identified and supported information. If the referenced form is superseded, the successor form(s) shall be utilized and supplemented as necessary to provide equivalent information as that provided in the superseded form. If the referenced form(s) is (are) discontinued, equivalent information as that provided in the discontinued form(s) shall be utilized.

G. The PTRR shall:

1. Include a workable data-populated version of the Formula Rate template and underlying work papers in Excel format with all formulas and links intact;

2. Provide the Formula Rate calculations and all inputs thereto, as well as supporting documentation and work papers for data that are used in the PTRR;

3. Provide sufficient information to enable Interested Parties to replicate the calculation of the PTRR. If transmission plant is projected to be placed in service (PTRR) or actually placed in service (ATRR) in the respective rate period at an amount other than on a historic cost basis (e.g., fair value adjustments), Grid Growth Ohio will provide a worksheet identifying such transmission plant and a narrative explanation of the individual impact of such items to the Annual Update;

4. With respect to any Accounting Change:

   a. Identify any Accounting Change, including:

      i. the initial adoption of a new 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 affect the PTRR calculation;

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

      v. changes to income tax elections;

      vi. the initial implementation of accounting changes in the reporting of the FERC Form 1 accounts from the prior year to the current year to the extent such change(s) affect(s) the Formula Rate revenue requirement: changes in (1) FERC's Uniform System of Accounts, (2) FERC Form No. 1 reporting requirements as applicable, (3) any FERC ratemaking orders applicable to the Formula Rate, and (4) the accounting policies of Grid Growth Ohio.

   b. Identify items included in the PTRR 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 PTRR; and

d. Provide, for each Accounting Change, a narrative explanation of the individual impact of such change on the PTRR.

H. If the date for posting the Annual Update or PTRR falls on a weekend or a holiday recognized by FERC, then the posting shall be due on the next business day. The date on which posting of the Annual Update occurs shall be that year's Publication Date. Any delay in the Publication Date or in the posting of the PTRR will result in an equivalent extension of time for the submission of information requests discussed in Section III of these Protocols.

I. Commencing at the time that Grid Growth Ohio's formula rate is initially populated, Grid Growth Ohio shall hold an open meeting among Interested Parties ("Annual Update Meeting"), to be conducted via Internet webcast, no earlier than ten (10) business days following the Publication Date and no later than July 15. No fewer than seven (7) calendar days prior to such Annual Update Meeting, Grid Growth Ohio shall provide notice on PJM's website of the time and date of the Annual Update Meeting, and shall provide notice of the posting via the e-mail exploder list for Grid Growth Ohio. The Annual Update Meeting shall: (i) permit Grid Growth Ohio to explain and clarify its ATRR and True-up; and (ii) provide Interested Parties an opportunity to seek information and clarifications from Grid Growth Ohio about the ATRR and True-up.

J. Commencing at the time that Grid Growth Ohio's formula rate is initially populated, Grid Growth Ohio shall hold an open meeting among Interested Parties ("Annual Projected Rate Meeting"), to be conducted via Internet webcast, no earlier than seven (7) business days following the posting of the PTRR (as described in Section II.C of these Protocols) and no later than November 30. No fewer than seven (7) calendar days prior to such Annual Projected Rate Meeting, Grid Growth Ohio shall provide notice on PJM's website of the time and date of the Annual Projected Rate Meeting, and shall provide notice of the posting via the e-mail exploder list for Grid Growth Ohio. The Annual Projected Rate Meeting shall: (i) permit Grid Growth Ohio to explain and clarify its PTRR and (ii) provide Interested Parties an opportunity to seek information and clarifications from Grid Growth Ohio about the PTRR.

Section III. Information Exchange Procedures

Each Annual Update and PTRR shall be subject to the following information exchange procedures ("Information Exchange Procedures"):

A. Commencing at the time that Grid Growth Ohio's formula rate is initially populated, Interested Parties shall have until August 31 following the Annual Update posting date (unless such period is extended with the written consent of Grid Growth Ohio or by FERC order) to serve a first set of information and document requests on Grid Growth Ohio pertaining to the Annual Update. Interested parties shall have until January 15 to serve follow-up information and document requests pertaining to the Annal Update (together with the August 31 deadline, the "ATRR Information Exchange Period").

Interested Parties shall have until January 15 following the PTRR posting date (unless such period is extended with the written consent of Grid Growth Ohio or by FERC order) to serve reasonable information and document requests on Grid Growth Ohio pertaining to the PTRR ("PTRR Information Exchange Period"). If August 31 or January 15 falls on a weekend or a holiday recognized by FERC, the deadline for submitting all information and document requests shall be extended to the next business day. Such information and document requests shall be limited to what is necessary to determine:

1. the extent or effect of an Accounting Change on the inputs to the Formula Rate or the resulting charges under the Formula Rate;

2. whether the ATRR or PTRR fails to include data properly recorded in accordance with these Protocols;

3. the proper application of the Formula Rate and procedures in these Protocols;

4. the accuracy of data and consistency with the Formula Rate of the calculations shown in the ATRR or PTRR;

5. the prudence of actual costs and expenditures included in the ATRR or the reasonableness of projected costs and expenditures included in the PTRR;

6. the effect of any change to the underlying Uniform System of Accounts or FERC Form No. 1; or

7. any other information that may reasonably have a substantive effect on the calculation of the charge pursuant to the Formula Rate.

The information and document requests shall not be directed to ascertaining whether the Formula Rate is just and reasonable.

B. Grid Growth Ohio shall make a good faith effort to respond to any information and document request within fifteen (15) business days of receipt of such request. Commencing at the time that Grid Growth Ohio's formula rate is initially populated, Grid Growth Ohio shall respond to all information and document requests by no later than February 25 following the Publication Date, unless the ATRR Information Exchange Period or PTRR Information Exchange Period is extended with written consent of Grid Growth Ohio or by FERC order.

C. Grid Growth Ohio shall not claim that responses to information and document requests provided pursuant to these Protocols are subject to any settlement privilege in any proceeding addressing Grid Growth Ohio's Annual Update or PTRR, and such responses may be included in any Formal Challenge or other submittal addressing Grid Growth Ohio's Annual Update or PTRR.

D. Grid Growth Ohio shall use best efforts to timely notify the proponent of an Information Request if all or any part of an Information Request is unclear or the subject matter is outside the scope of Section III.B. If the parties are unable to resolve any dispute regarding an information request, the matter may be referred to the FERC Dispute Resolution Service.

Section IV. Challenge Procedures

A. Interested Parties shall have until March 31 following the Publication Date (unless such period is extended with the written consent of Grid Growth Ohio or by FERC order) ("Review Period") to review the inputs, supporting explanations, allocations and calculations and to notify Grid Growth Ohio in writing, which may be made electronically, of any specific Preliminary Challenges to the Annual Update or PTRR. If the final day of the Review Period falls on a holiday recognized by FERC, the deadline for submitting all Preliminary Challenges shall be extended to the next business day. An Interested Party may not pursue a Formal Challenge unless it submitted a Preliminary Challenge on some issue (which may be different from the Formal Challenge issue) during the applicable Review Period. Failure to raise an issue in one year's Formal Challenge shall not bar the lodging of that issue as related to a subsequent Annual Update or PTRR. This Section IV.A in no way shall affect a party's rights under Federal Power Act ("FPA") section 206 as set forth in Section IV.I of these Protocols.

B. Preliminary Challenges shall be subject to the resolution procedures and limitations in this Section IV. Preliminary Challenges shall be filed pursuant to these Protocols and shall satisfy all of the following requirements.

1. A party submitting a Preliminary Challenge to Grid Growth Ohio must specify the inputs, supporting explanations, allocations, calculations, or other information to which it objects, and provide an explanation and documents to support its challenge.

2. Grid Growth Ohio shall make a good faith effort to respond to any Preliminary Challenge within twenty (20) business days of written receipt of such challenge.

3. Grid Growth Ohio, and where applicable, PJM, shall appoint a senior representative to work with each party that submitted a Preliminary Challenge (or its representative) toward a resolution of the challenge.

4. If Grid Growth Ohio disagrees with such challenge, they will provide the Interested Party(ies) with a written explanation supporting the inputs, supporting explanations, allocations, calculations, or other information.

5. No Preliminary Challenge may be submitted after March 31, and Grid Growth Ohio must respond to all Preliminary Challenges by no later than April 30 unless the Review Period is extended with written consent of Grid Growth Ohio or by FERC order, or as provided in Section IV.A above.

6. Grid Growth Ohio will serve all Preliminary Challenges and its response(s) to such Preliminary Challenges upon any Interested Party that requests such service, subject to the protection of any confidential information contained in such

Preliminary Challenges or responses, as needed, under the Protective Agreement and Non-Disclosure Certificate.

C. Formal Challenges shall be subject to the resolution procedures and limitations in this Section IV. Formal Challenges shall be filed pursuant to these Protocols and shall satisfy all of the following requirements.

1. A Formal Challenge shall:

a. Clearly identify the action or inaction which is alleged to violate the filed Formula Rate or these Protocols;

b. Explain how the action or inaction violates the filed Formula Rate or these Protocols;

c. 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:

i. the extent or effect of an Accounting Change;

ii. whether the ATRR or PTRR 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 charges shown in the ATRR or PTRR;

v. the prudence of actual costs and expenditures;

vi. the effect of any change to the underlying Uniform System of Accounts or FERC Form No. 1; or

vii. any other information that may reasonably have a substantive effect on the calculation of the charge pursuant to the Formula Rate.

d. 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 challenged action or inaction;

e. State whether the claim(s) 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;

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

g. 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

2. Service. Any person filing a Formal Challenge must serve a copy of such Formal Challenge on Grid Growth Ohio. Service to Grid Growth Ohio must be simultaneous with filing at FERC. Simultaneous service can be accomplished by electronic mail in accordance with 18 C.F.R. § 385.2010, express delivery, or messenger. A party filing a Formal Challenge shall serve the individual listed as the contact person on Grid Growth Ohio's Informational Filing required under Section VI of these Protocols.

D. Preliminary and Formal Challenges shall be limited to all issues that may be necessary to determine:

1. the extent or effect of an Accounting Change;

2. whether the ATRR or PTRR fails to include data properly recorded in accordance with these Protocols, or includes data not properly recorded in accordance with these Protocols;

3. the proper application of the Formula Rate and procedures in these Protocols;

4. the accuracy of data and consistency with the Formula Rate of the calculations shown in the ATRR and PTRR;

5. the prudence of actual costs and expenditures included as inputs to the Formula Rate;

6. the reasonableness of any projection that forms a basis of the PTRR;

7. the effect of any change to the underlying Uniform System of Accounts or FERC Form No. 1; or

8. any other information that may reasonably have a substantive effect on the calculation of the charge pursuant to the Formula Rate.

E. Any changes or adjustments to the ATRR and PTRR resulting from the information exchange and Preliminary Challenge processes that are agreed to by Grid Growth Ohio will be reported in the applicable Informational Filing required pursuant to Section VI of these Protocols. Any such changes or adjustments agreed to by Grid Growth Ohio on or before December 1 will be reflected in the PTRR for the upcoming Rate Year. Any changes or adjustments agreed to by Grid Growth Ohio after December 1 will be reflected in the following year's Annual Update, as discussed in Section V of these Protocols.

F. An Interested Party shall have until June 1 following the Review Period (unless such date is extended with the written consent of Grid Growth Ohio to continue efforts to resolve the Preliminary Challenge) to make a Formal Challenge with FERC, which shall be served on Grid Growth Ohio on the date of such filing as specified in Section IV.C.2 above. A Formal Challenge shall be filed in the same docket as Grid Growth Ohio's Informational Filing discussed in Section VI of these Protocols. Grid Growth Ohio shall respond to the Formal Challenge by the deadline established by FERC.

G. In any proceeding initiated by FERC concerning the Annual Update or PTRR or in response to a Formal Challenge, Grid Growth Ohio shall bear the burden, consistent with FPA section 205, of proving 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 the Formula Rate. Nothing herein is intended to alter the burdens applied by FERC with respect to prudence challenges.

H. Except as specifically provided herein, nothing herein shall be deemed to limit in any way the right of Grid Growth Ohio to file unilaterally, pursuant to FPA section 205 and the regulations thereunder, to change these Protocols, the Formula Rate, or any of its inputs (including, but not limited to, rate of return and transmission incentive rate treatment), or to replace the Formula Rate with a stated rate, or the right of any other party to request such changes pursuant to FPA section 206.

I. Grid Growth Ohio reserves the right to file under FPA section 205: (i) to modify the stated values for amortization and depreciation rates in the filed template, (ii) to reflect ministerial changes to the FERC Form 1 reporting requirements (i.e., changes in account descriptions or line numbers that do not reflect changes in the nature or type of costs or expenses recorded therein), or (iii) to seek recovery of prudently-incurred abandoned plant expenses.

J. Any Interested Party seeking changes to the application of the Formula Rate due to a change in the Uniform System of Accounts or FERC Form No. 1 shall first raise the matter with Grid Growth Ohio in accordance with this Section IV before pursuing a Formal Challenge.

Section V. Changes to Actual Transmission Revenue Requirement or Projected Transmission Revenue Requirement

Except as provided in Section IV.E of these Protocols, any changes to the data inputs, including but not limited to revisions to Grid Growth Ohio's FERC Form No. 1, or as the result of any FERC proceeding to consider the ATRR or PTRR, or as a result of the procedures set forth herein, shall be incorporated into the Formula Rate and the charges produced by the Formula Rate in the PTRR for the next Rate Year. This true-up mechanism shall apply in lieu of mid-Rate Year adjustments. Interest on any refund or surcharge shall be calculated in accordance with the procedures outlined in Section VII of these Protocols.

Section VI. Informational Filings

A. Commencing at the time that Grid Growth Ohio's formula rate is initially populated, Grid Growth Ohio shall submit to FERC informational filings (Informational Filing) of its

PTRR for the Rate Year or ATRR for the Rate Year as applicable under the respective procedures set forth in Section II. The relevant Informational Filing must include information that is reasonably necessary to determine:

1. that input data to the Formula Rate are properly recorded in any underlying work papers;

2. that Grid Growth Ohio has properly applied the Formula Rate and these Protocols;

3. the accuracy of data and the consistency with the Formula Rate of the transmission revenue requirement and rates under review;

4. the extent of Accounting Changes that affect Formula Rate inputs; and

5. the reasonableness of projected costs.

The Informational Filing must also describe any corrections or adjustments made during the period since the Publication Date, and must describe all aspects of the Formula Rate or its inputs that are the subject of an ongoing dispute under the Preliminary Challenge or Formal Challenge procedures.

Finally, the Informational Filing shall include for the applicable Rate Year the following information related to affiliate cost allocation: a detailed description of the methodologies used to allocate and directly assign costs between Grid Growth Ohio and its affiliates by service category or function, including any changes to such cost allocation methodologies from the prior Rate Year, and the reasons and justification for those changes; the magnitude of such costs that have been allocated or directly assigned between Grid Growth Ohio and each affiliate by service category or function; and a copy of any service agreement between Grid Growth Ohio and any affiliate that went into effect during the Rate Year.

On the date of submission to FERC, Grid Growth Ohio shall provide notice of the Informational Filing via the e-mail exploder list for Grid Growth Ohio and by posting the docket number assigned to Grid Growth Ohio's relevant Informational Filing on the PJM website.[5]

B. Any challenges to the implementation of the Formula Rate must be made through the challenge procedures described in Section IV of these Protocols or in a separate complaint proceeding, and not in response to the Informational Filing.

Section VII. Calculation of True-up

The True-up will be determined in the following manner:

A. As part of the Annual Update for each Rate Year, Grid Growth Ohio shall determine the difference between the revenues received by Grid Growth Ohio corresponding to the rate effective period based on the PTRR for the Rate Year (net of the True-up from the prior

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[5] *See* note 1.

year) and the ATRR for the same Rate Year based on actual cost data as reflected in its FERC Form No. 1. The True-up will be determined as follows:

1. The ATRR for the previous Rate Year as determined using Grid Growth Ohio's completed FERC Form No. 1 report shall be compared to the revenues received by Grid Growth Ohio corresponding to the rate effective period based on the PTRR (net of the True-up from the prior year) for that same Rate Year ("True-up Year") to determine any excess or shortfall in the revenues received by Grid Growth Ohio corresponding to the rate effective period in the True-up Year. The revenue excess or shortfall determined by this comparison shall constitute the "True-up."

2. Interest on any True-up shall be based on the interest rate equal to the interest rate determined by 18 C.F.R. § 35.19a. Interest rates will be used to calculate the time value of money for the period that the True-up exists. The interest rate to be applied to the True-up will be determined using the average rate for the twenty (20) months preceding September 1 of the current year. Interest on refunds and surcharges shall be compounded on a quarterly basis.

B. Grid Growth Ohio will post on PJM's website all information relating to the True-up as part of the Annual Update. As provided in Section II.B of these Protocols, Grid Growth Ohio shall provide its Annual Update for the immediately preceding calendar year to PJM and cause such information to be posted on the PJM website on or before June 15 of each year subsequent to calendar year 2026.

Section VIII. Formula Rate Inputs

A. Fixed components to the Formula Rate: for (i) rate of return on common equity; and (ii) depreciation and/or amortization rates, the values in the Formula Rate shall be stated values specified in the Formula Rate and may be changed only pursuant to a FPA section 205 or section 206 proceeding.

B. Unpopulated Formula Rate line items: with respect to line items in the Formula Rate that are not currently populated with non-zero numerical values because FERC policy requires prior authorization for recovery of the underlying costs or because, due to the nature of the associated functional activities, such costs are not considered part of Grid Growth Ohio's transmission-related revenue requirement (but not line items that are zero values in a particular Rate Year for the sole reason that no such costs or revenues were incurred or revenues received or projected to be incurred or received during the Rate Year), such line items shall not be populated with non-zero values except as may be authorized following a FPA section 205 or section 206 proceeding.

Section IX. Competitive Concessions

A. For transmission development projects assigned to Grid Growth Ohio as a result of the PJM competitive proposal process, Grid Growth Ohio may, in its sole discretion, agree with PJM to apply a competitive concession that will result in a lower Net Revenue Requirement on a project-specific basis than that which would otherwise be produced by the Grid Growth Ohio Attachment H-41A Formula Rate. Any competitive concession will appear as a zero or negative input to the formula, and will be determined on a project-specific basis using a workpaper that will be provided to Interested Parties as supporting documentation for each Grid Growth Ohio Annual Update.

ATTACHMENT B

ATTACHMENT H-40B

Formula Rate Implementation Protocols
Grid Growth Ohio EHV, LLC ("Grid Growth Ohio EHV")

ANNUAL TRUE-UP, INFORMATION EXCHANGE, AND CHALLENGE PROCEDURES

Definitions

"Actual Transmission Revenue Requirement" or "ATRR" means the actual net transmission revenue requirement of Grid Growth Ohio EHV calculated and posted on the PJM website[1] no later than June 15 of each year subsequent to calendar year 2026 for the immediately preceding calendar year in accordance with Grid Growth Ohio EHV's Formula Rate and based upon Grid Growth Ohio EHV's actual costs and expenditures.

"Annual Update" means Grid Growth Ohio EHV's ATRR for the preceding calendar year, as well as the True-up for the prior Rate Year, as posted on or before June 15 of each year.

"Formal Challenge" means a written challenge to an Annual Update or Projected Transmission Revenue Requirement submitted to the Federal Energy Regulatory Commission (the "Commission" or "FERC") as provided in Section IV below.

"Formula Rate" means the collection of formulas and worksheets included as Attachment H-40A of the PJM Tariff.

"Informational Filing" means the informational filing to FERC containing Grid Growth Ohio EHV's, as applicable: (1) the PTRR for the upcoming Rate Year, as filed on or before October 31 of each year, and (2) the ATRR for the preceding calendar year, as well as its related True-up to the PTRR for the respective Rate Year, as filed on or before June 15 of each year.

"Interested Parties" include, but are not limited to, customers under the PJM Tariff, state utility regulatory commissions, the Organization of PJM States, Inc., consumer advocacy agencies, state attorneys general, and any party to any docket assigned by the Commission to Grid Growth Ohio EHV's Formula Rate Filing and Annual Update.

"PJM Tariff" means the Open Access Transmission Tariff of the PJM Interconnection, L.L.C.

"Preliminary Challenge" means a written challenge to the Annual Update or Projected Transmission Revenue Requirement submitted to Grid Growth Ohio EHV as provided in Section IV below.

"Projected Transmission Revenue Requirement" or "PTRR" means the projected net transmission revenue requirement of Grid Growth Ohio EHV calculated for the forthcoming

[1] The posting of revenue requirement information to the PJM website will cause such information to be accessible via PJM's OASIS at the "Transmission Owner Formula Rates" link on OASIS.

Rate Year, as well as, where applicable, the most recently calculated True-up, with interest, to be posted on the PJM website[2] no later than October 31 of each year for rates effective the next calendar year starting January 1.

"Protective Agreement and Non-Disclosure Certificate" means the agreement and certificate executed by Interested Parties and their representatives for a Rate Year in order to obtain access to material that Grid Growth Ohio EHV deems confidential or that contains Critical Energy Infrastructure Information as that term is defined in 18 C.F.R. § 388.113(c)(1) (2024).

"Protocols" means these Protocols, included as Attachment H-40B of the PJM Tariff.

"Publication Date" means the date on which the Annual Update is posted on the PJM website.[3]

"Rate Year" means the twelve consecutive month period that begins on January 1 and continues through December 31.

"Transmission Provider" means PJM Interconnection, L.L.C., or its successor or assignee.

"True-up" means the difference between the revenues received by Grid Growth Ohio EHV corresponding to the rate effective period of the PTRR (net of the True-up from the prior year) and the ATRR, for the same Rate Year, which shall be provided in the Annual Update on or before June 15 of the year subsequent to the Rate Year. The True-up will be a component of the PTRR.

Section I. Applicability

The following procedures shall apply to Grid Growth Ohio EHV's calculation of its Actual Transmission Revenue Requirement, True-up, and Projected Transmission Revenue Requirement.

Section II. Annual Update and Projected Transmission Revenue Requirement

A. On or before June 15 of each year subsequent to calendar year 2026, commencing at the time that Grid Growth Ohio EHV's formula rate is initially populated, Grid Growth Ohio EHV shall determine its Annual Update for the immediately preceding calendar year under Attachment H-40A and Section VII of these Protocols, including calculation of the True-up to be included in its PTRR for the subsequent Rate Year.

B. On or before June 15 of each year subsequent to calendar year 2026, commencing at the time that Grid Growth Ohio EHV's formula rate is initially populated, Grid Growth Ohio EHV shall:

[2] *See* note 1.

[3] *See* note 1.

1. provide its Annual Update for the immediately preceding calendar year ~~and Protective Agreement and Non-Disclosure Certificate~~ to PJM and cause such information to be posted on the PJM website;[4] and

2. provide notice of such posting via the e-mail exploder list for Grid Growth Ohio EHV.

C. Commencing at the time that Grid Growth Ohio EHV's formula rate is initially populated, on or before October 31, Grid Growth Ohio EHV shall:

1. provide its PTRR to PJM and cause such information to be posted on the PJM website, in both a Portable Document Format ("PDF") and fully-functioning Excel file, and

2. provide notice of such posting via the e-mail exploder list for Grid Growth Ohio EHV.

D. If transmission plant is projected to be placed in service (PTRR) or actually placed in service (ATRR) in the respective rate period, at an amount other than on a historic cost basis (e.g., fair value adjustments), Grid Growth Ohio EHV will provide a worksheet identifying such transmission plant and a narrative explanation of the individual impact of such items to the Annual Update.

E. The ATRR shall:

1. Include a workable data-populated version of the Formula Rate template and underlying work papers in Excel format with all formulas and links intact;

2. Be based on Grid Growth Ohio EHV's FERC Form No. 1 for the prior calendar year;

3. Provide the Formula Rate calculations and all inputs thereto, as well as supporting documentation and work papers for data that are used in the ATRR that are not otherwise available in the FERC Form No. ls~~, subject to the protection of any confidential information, as needed, under the Protective Agreement and Non-Disclosure Certificate~~;

4. Provide sufficient information to enable Interested Parties to replicate the calculation of the ATRR results from the FERC Form No. ls;

5. Identify any changes in the formula references (page and line numbers) to the FERC Form No. ls;

6. Identify and, to the extent not explained in a worksheet included in the ATRR, explain, all material adjustments made to the FERC Form No. 1 data in

[4] *See* note 1.

determining formula inputs, including relevant footnotes to the FERC Form No. ls and any adjustments not shown in the FERC Form No. ls;

7. Provide underlying data for Formula Rate inputs that provide greater granularity than is required for the FERC Form No. 1;

8. As part of the ATRR open meeting, Grid Growth Ohio EHV shall provide a summary of the actual year results to the PTRR for the same rate period, to accompany further discussion of key drivers of the ATRR and PTRR.

9. With respect to any change in accounting that affects inputs to the Formula Rate or the resulting charges billed under the Formula Rate ("Accounting Change"):

    a. Identify any Accounting Change, including:

        i. the initial adoption of a new 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 affect the ATRR and True-up calculation;

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

        v. changes to income tax elections; and

        vi. the initial implementation of accounting changes in the reporting of the FERC Form No. 1 accounts from the prior year to the current year to the extent such change(s) affect(s) the Formula Rate revenue requirement: changes in (1) FERC's Uniform System of Accounts, (2) FERC Form No. 1 reporting requirements as applicable, (3) any FERC ratemaking orders applicable to the Formula Rate, and (4) the accounting policies of Grid Growth Ohio EHV.

    b. Identify items included in the ATRR 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 ATRR;

    d. Provide, for each Accounting Change, a narrative explanation of the individual impact of such change on the ATRR; and

10. Include for the applicable Rate Year the following information related to affiliate cost allocation: (A) a detailed description of the methodologies used to allocate and directly assign costs between Grid Growth Ohio EHV and its affiliates by service category and function, including any changes to such cost allocation methodologies from the prior year, and the reasons and justification for those changes; and (B) the magnitude of such costs that have been allocated or directly assigned between Grid Growth Ohio EHV and each affiliate by service category or function.

F. It is the intent of the Formula Rate, including the supporting explanations and allocation described therein, that each input to the Formula Rate will be either taken directly from FERC Form No. 1 or reconcilable to FERC Form No. 1 by the application of clearly identified and supported information. If the referenced form is superseded, the successor form(s) shall be utilized and supplemented as necessary to provide equivalent information as that provided in the superseded form. If the referenced form(s) is (are) discontinued, equivalent information as that provided in the discontinued form(s) shall be utilized.

G. The PTRR shall:

1. Include a workable data-populated version of the Formula Rate template and underlying work papers in Excel format with all formulas and links intact;

2. Provide the Formula Rate calculations and all inputs thereto, as well as supporting documentation and work papers for data that are used in the PTRR;

3. Provide sufficient information to enable Interested Parties to replicate the calculation of the PTRR. If transmission plant is projected to be placed in service (PTRR) or actually placed in service (ATRR) in the respective rate period at an amount other than on a historic cost basis (e.g., fair value adjustments), Grid Growth Ohio EHV will provide a worksheet identifying such transmission plant and a narrative explanation of the individual impact of such items to the Annual Update;

4. With respect to any Accounting Change:

a. Identify any Accounting Change, including:

i. the initial adoption of a new 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 affect the PTRR calculation;

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

v. changes to income tax elections;

vi. the initial implementation of accounting changes in the reporting of the FERC Form 1 accounts from the prior year to the current year to the extent such change(s) affect(s) the Formula Rate revenue requirement: changes in (1) FERC's Uniform System of Accounts, (2) FERC Form No. 1 reporting requirements as applicable, (3) any FERC ratemaking orders applicable to the Formula Rate, and (4) the accounting policies of Grid Growth Ohio EHV.

b. Identify items included in the PTRR 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 PTRR; and

d. Provide, for each Accounting Change, a narrative explanation of the individual impact of such change on the PTRR.

H. If the date for posting the Annual Update or PTRR falls on a weekend or a holiday recognized by FERC, then the posting shall be due on the next business day. The date on which posting of the Annual Update occurs shall be that year's Publication Date. Any delay in the Publication Date or in the posting of the PTRR will result in an equivalent extension of time for the submission of information requests discussed in Section III of these Protocols.

I. Commencing at the time that Grid Growth Ohio EHV's formula rate is initially populated, Grid Growth Ohio EHV shall hold an open meeting among Interested Parties ("Annual Update Meeting"), to be conducted via Internet webcast, no earlier than ten (10) business days following the Publication Date and no later than July 15. No fewer than seven (7) calendar days prior to such Annual Update Meeting, Grid Growth Ohio EHV shall provide notice on PJM's website of the time and date of the Annual Update Meeting, and shall provide notice of the posting via the e-mail exploder list for Grid Growth Ohio EHV. The Annual Update Meeting shall: (i) permit Grid Growth Ohio EHV to explain and clarify its ATRR and True-up; and (ii) provide Interested Parties an opportunity to seek information and clarifications from Grid Growth Ohio EHV about the ATRR and True-up.

J. Commencing at the time that Grid Growth Ohio EHV's formula rate is initially populated, Grid Growth Ohio EHV shall hold an open meeting among Interested Parties ("Annual Projected Rate Meeting"), to be conducted via Internet webcast, no earlier than seven (7) business days following the posting of the PTRR (as described in Section II.C of these Protocols) and no later than November 30. No fewer than seven (7) calendar days prior to such Annual Projected Rate Meeting, Grid Growth Ohio EHV shall provide notice on PJM's website of the time and date of the Annual Projected Rate Meeting, and shall provide notice of the posting via the e-mail exploder list for Grid Growth Ohio EHV. The Annual Projected Rate Meeting shall: (i) permit Grid Growth Ohio EHV to explain and clarify its PTRR and (ii) provide Interested Parties an opportunity to seek information and clarifications from Grid Growth Ohio EHV about the PTRR.

Section III. Information Exchange Procedures

Each Annual Update and PTRR shall be subject to the following information exchange procedures ("Information Exchange Procedures"):

A. Commencing at the time that Grid Growth Ohio EHV's formula rate is initially populated, Interested Parties shall have until August 31 following the Annual Update posting date (unless such period is extended with the written consent of Grid Growth Ohio EHV or by FERC order) to serve a first set of information and document requests on Grid Growth Ohio EHV pertaining to the Annual Update. Interested parties shall have until January 15 to serve follow-up information and document requests pertaining to the Annal Update (together with the August 31 deadline, the "ATRR Information Exchange Period")~~, but such requests must be specifically limited to clarification or additional information regarding Grid Growth Ohio EHV's responses provided to any sets of information and document requests issued to Grid Growth Ohio EHV on or before August 31.~~.

Interested Parties shall have until January 15 following the PTRR posting date (unless such period is extended with the written consent of Grid Growth Ohio EHV or by FERC order) to serve reasonable information and document requests on Grid Growth Ohio EHV pertaining to the PTRR ("PTRR Information Exchange Period"). If August 31 or January 15 falls on a weekend or a holiday recognized by FERC, the deadline for submitting all information and document requests shall be extended to the next business day. Such information and document requests shall be limited to what is necessary to determine:

1. the extent or effect of an Accounting Change on the inputs to the Formula Rate or the resulting charges under the Formula Rate;

2. whether the ATRR or PTRR fails to include data properly recorded in accordance with these Protocols;

3. the proper application of the Formula Rate and procedures in these Protocols;

4. the accuracy of data and consistency with the Formula Rate of the calculations shown in the ATRR or PTRR;

5. the prudence of actual costs and expenditures included in the ATRR or the reasonableness of projected costs and expenditures included in the PTRR;

6. the effect of any change to the underlying Uniform System of Accounts or FERC Form No. 1; or

7. any other information that may reasonably have a substantive effect on the calculation of the charge pursuant to the Formula Rate.

The information and document requests shall not be directed to ascertaining whether the Formula Rate is just and reasonable.

B. Grid Growth Ohio EHV shall make a good faith effort to respond to any information and document request within fifteen (15) business days of receipt of such request. Commencing at the time that Grid Growth Ohio EHV's formula rate is initially populated, Grid Growth Ohio EHV shall respond to all information and document requests by no later than February 25 following the Publication Date, unless the ATRR Information Exchange Period or PTRR Information Exchange Period is extended with written consent of Grid Growth Ohio EHV or by FERC order.

C. Grid Growth Ohio EHV shall not claim that responses to information and document requests provided pursuant to these Protocols are subject to any settlement privilege in any proceeding addressing Grid Growth Ohio EHV's Annual Update or PTRR, and such responses may be included in any Formal Challenge or other submittal addressing Grid Growth Ohio EHV's Annual Update or PTRR.

D. Grid Growth Ohio EHV shall use best efforts to timely notify the proponent of an Information Request if all or any part of an Information Request is unclear or the subject matter is outside the scope of Section III.B. If the parties are unable to resolve any dispute regarding an information request, the matter may be referred to the FERC Dispute Resolution Service.

Section IV. Challenge Procedures

A. Interested Parties shall have until March 31 following the Publication Date (unless such period is extended with the written consent of Grid Growth Ohio EHV or by FERC order) ("Review Period") to review the inputs, supporting explanations, allocations and calculations and to notify Grid Growth Ohio EHV in writing, which may be made electronically, of any specific Preliminary Challenges to the Annual Update or PTRR. If the final day of the Review Period falls on a holiday recognized by FERC, the deadline for submitting all Preliminary Challenges shall be extended to the next business day. An Interested Party may not pursue a Formal Challenge unless it submitted a Preliminary Challenge on some issue (which may be different from the Formal Challenge issue) during the applicable Review Period. Failure to raise an issue in one year's Formal Challenge shall not bar the lodging of that issue as related to a subsequent Annual Update or PTRR. This Section IV.A in no way shall affect a party's rights under Federal Power Act ("FPA") section 206 as set forth in Section IV.I of these Protocols.

B. Preliminary Challenges shall be subject to the resolution procedures and limitations in this Section IV. Preliminary Challenges shall be filed pursuant to these Protocols and shall satisfy all of the following requirements.

1. A party submitting a Preliminary Challenge to Grid Growth Ohio EHV must specify the inputs, supporting explanations, allocations, calculations, or other information to which it objects, and provide an explanation and documents to support its challenge.

2. Grid Growth Ohio EHV shall make a good faith effort to respond to any Preliminary Challenge within twenty (20) business days of written receipt of such challenge.

3. Grid Growth Ohio EHV, and where applicable, PJM, shall appoint a senior representative to work with each party that submitted a Preliminary Challenge (or its representative) toward a resolution of the challenge.

4. If Grid Growth Ohio EHV disagrees with such challenge, they will provide the Interested Party(ies) with a written explanation supporting the inputs, supporting explanations, allocations, calculations, or other information.

5. No Preliminary Challenge may be submitted after March 31, and Grid Growth Ohio EHV must respond to all Preliminary Challenges by no later than April 30 unless the Review Period is extended with written consent of Grid Growth Ohio EHV or by FERC order, or as provided in Section IV.A above.

6. Grid Growth Ohio EHV will serve all Preliminary Challenges and its response(s) to such Preliminary Challenges upon any Interested Party that requests such service, subject to the protection of any confidential information contained in such Preliminary Challenges or responses, as needed, under the Protective Agreement and Non-Disclosure Certificate.

C. Formal Challenges shall be subject to the resolution procedures and limitations in this Section IV. Formal Challenges shall be filed pursuant to these Protocols and shall satisfy all of the following requirements.

1. A Formal Challenge shall:

a. Clearly identify the action or inaction which is alleged to violate the filed Formula Rate or these Protocols;

b. Explain how the action or inaction violates the filed Formula Rate or these Protocols;

c. 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:

i. the extent or effect of an Accounting Change;

ii. whether the ATRR or PTRR 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 charges shown in the ATRR or PTRR;

v. the prudence of actual costs and expenditures;

vi. the effect of any change to the underlying Uniform System of Accounts or FERC Form No. 1; or

vii. any other information that may reasonably have a substantive effect on the calculation of the charge pursuant to the Formula Rate.

d. 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 challenged action or inaction;

e. State whether the claim(s) 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;

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

g. 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

2. Service. Any person filing a Formal Challenge must serve a copy of such Formal Challenge on Grid Growth Ohio EHV. Service to Grid Growth Ohio EHV must be simultaneous with filing at FERC. Simultaneous service can be accomplished by electronic mail in accordance with 18 C.F.R. § 385.2010, express delivery, or messenger. A party filing a Formal Challenge shall serve the individual listed as the contact person on Grid Growth Ohio EHV's Informational Filing required under Section VI of these Protocols.

D. Preliminary and Formal Challenges shall be limited to all issues that may be necessary to determine:

1. the extent or effect of an Accounting Change;

2. whether the ATRR or PTRR fails to include data properly recorded in accordance with these Protocols, or includes data not properly recorded in accordance with these Protocols;

3. the proper application of the Formula Rate and procedures in these Protocols;

4. the accuracy of data and consistency with the Formula Rate of the calculations shown in the ATRR and PTRR;

5. the prudence of actual costs and expenditures included as inputs to the Formula Rate;

6. the reasonableness of any projection that forms a basis of the PTRR;

7. the effect of any change to the underlying Uniform System of Accounts or FERC Form No. 1; or

8. any other information that may reasonably have a substantive effect on the calculation of the charge pursuant to the Formula Rate.

E. Any changes or adjustments to the ATRR and PTRR resulting from the information exchange and Preliminary Challenge processes that are agreed to by Grid Growth Ohio EHV will be reported in the applicable Informational Filing required pursuant to Section VI of these Protocols. Any such changes or adjustments agreed to by Grid Growth Ohio EHV on or before December 1 will be reflected in the PTRR for the upcoming Rate Year. Any changes or adjustments agreed to by Grid Growth Ohio EHV after December 1 will be reflected in the following year's Annual Update, as discussed in Section V of these Protocols.

F. An Interested Party shall have until June 1 following the Review Period (unless such date is extended with the written consent of Grid Growth Ohio EHV to continue efforts to resolve the Preliminary Challenge) to make a Formal Challenge with FERC, which shall be served on Grid Growth Ohio EHV on the date of such filing as specified in Section IV.C.2 above. A Formal Challenge shall be filed in the same docket as Grid Growth Ohio EHV's Informational Filing discussed in Section VI of these Protocols. Grid Growth Ohio EHV shall respond to the Formal Challenge by the deadline established by FERC.

G. In any proceeding initiated by FERC concerning the Annual Update or PTRR or in response to a Formal Challenge, Grid Growth Ohio EHV shall bear the burden, consistent with FPA section 205, of proving 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 the Formula Rate. Nothing herein is intended to alter the burdens applied by FERC with respect to prudence challenges.

H. Except as specifically provided herein, nothing herein shall be deemed to limit in any way the right of Grid Growth Ohio EHV to file unilaterally, pursuant to FPA section 205 and the regulations thereunder, to change these Protocols, the Formula Rate, or any of its inputs (including, but not limited to, rate of return and transmission incentive rate treatment), or to replace the Formula Rate with a stated rate, or the right of any other party to request such changes pursuant to FPA section 206.

I. Grid Growth Ohio EHV reserves the right to file under FPA section 205: (i) to modify the stated values for amortization and depreciation rates in the filed template, (ii) to reflect ministerial changes to the FERC Form 1 reporting requirements (i.e., changes in account descriptions or line numbers that do not reflect changes in the nature or type of costs or expenses recorded therein), or (iii) to seek recovery of prudently-incurred abandoned plant expenses. ~~Interested Parties may have the right to contest such filing(s), but the sole issue in any such limited Section 205 proceeding shall be whether the proposed limited change is just and reasonable, and it shall not address other aspects of the Formula Rate.~~

J. Any Interested Party seeking changes to the application of the Formula Rate due to a change in the Uniform System of Accounts or FERC Form No. 1 shall first raise the matter with Grid Growth Ohio EHV in accordance with this Section IV before pursuing a Formal Challenge.

Section V. Changes to Actual Transmission Revenue Requirement or Projected Transmission Revenue Requirement

Except as provided in Section IV.E of these Protocols, any changes to the data inputs, including but not limited to revisions to Grid Growth Ohio EHV's FERC Form No. 1, or as the result of any FERC proceeding to consider the ATRR or PTRR, or as a result of the procedures set forth herein, shall be incorporated into the Formula Rate and the charges produced by the Formula Rate in the PTRR for the next Rate Year. This true-up mechanism shall apply in lieu of mid-Rate Year adjustments. Interest on any refund or surcharge shall be calculated in accordance with the procedures outlined in Section VII of these Protocols.

Section VI. Informational Filings

A. Commencing at the time that Grid Growth Ohio EHV's formula rate is initially populated, Grid Growth Ohio EHV shall submit to FERC informational filings (Informational Filing) of its PTRR for the Rate Year or ATRR for the Rate Year as applicable under the respective procedures set forth in Section II. The relevant Informational Filing must include information that is reasonably necessary to determine:

1. that input data to the Formula Rate are properly recorded in any underlying work papers;

2. that Grid Growth Ohio EHV has properly applied the Formula Rate and these Protocols;

3. the accuracy of data and the consistency with the Formula Rate of the transmission revenue requirement and rates under review;

4. the extent of Accounting Changes that affect Formula Rate inputs; and

5. the reasonableness of projected costs.

The Informational Filing must also describe any corrections or adjustments made during the period since the Publication Date, and must describe all aspects of the Formula Rate or its inputs that are the subject of an ongoing dispute under the Preliminary Challenge or Formal Challenge procedures.

Finally, the Informational Filing shall include for the applicable Rate Year the following information related to affiliate cost allocation: a detailed description of the methodologies used to allocate and directly assign costs between Grid Growth Ohio EHV and its affiliates by service category or function, including any changes to such cost allocation methodologies from the prior Rate Year, and the reasons and justification for those changes; the magnitude of such costs that have been allocated or directly assigned between Grid Growth Ohio EHV and each affiliate by service category or function; and a copy of any service agreement between Grid Growth Ohio EHV and any affiliate that went into effect during the Rate Year.

On the date of submission to FERC, Grid Growth Ohio EHV shall provide notice of the Informational Filing via the e-mail exploder list for Grid Growth Ohio EHV and by posting the docket number assigned to Grid Growth Ohio EHV's relevant Informational Filing on the PJM website~~, subject to the protection of any confidential information contained in the Informational Filing, as needed, under the Protective Agreement and Non-Disclosure Certificate.~~.[5]

B. Any challenges to the implementation of the Formula Rate must be made through the challenge procedures described in Section IV of these Protocols or in a separate complaint proceeding, and not in response to the Informational Filing.

Section VII. Calculation of True-up

The True-up will be determined in the following manner:

A. As part of the Annual Update for each Rate Year, Grid Growth Ohio EHV shall determine the difference between the revenues received by Grid Growth Ohio EHV corresponding to the rate effective period based on the PTRR for the Rate Year (net of the True-up from the prior year) and the ATRR for the same Rate Year based on actual cost data as reflected in its FERC Form No. 1. The True-up will be determined as follows:

1. The ATRR for the previous Rate Year as determined using Grid Growth Ohio EHV's completed FERC Form No. 1 report shall be compared to the revenues received by Grid Growth Ohio EHV corresponding to the rate effective period based on the PTRR (net of the True-up from the prior year) for that same Rate

[5] *See* note 1.

Year ("True-up Year") to determine any excess or shortfall in the revenues received by Grid Growth Ohio EHV corresponding to the rate effective period in the True-up Year. The revenue excess or shortfall determined by this comparison shall constitute the "True-up."

2. Interest on any True-up shall be based on the interest rate equal to the interest rate determined by 18 C.F.R. § 35.19a. Interest rates will be used to calculate the time value of money for the period that the True-up exists. The interest rate to be applied to the True-up will be determined using the average rate for the twenty (20) months preceding September 1 of the current year. Interest on refunds and surcharges shall be compounded on a quarterly basis.

B. Grid Growth Ohio EHV will post on PJM's website all information relating to the True-up as part of the Annual Update. As provided in Section II.B of these Protocols, Grid Growth Ohio EHV shall provide its Annual Update for the immediately preceding calendar year to PJM and cause such information to be posted on the PJM website on or before June 15 of each year subsequent to calendar year 2026.

Section VIII. Formula Rate Inputs

A. Fixed components to the Formula Rate: for (i) rate of return on common equity; and (ii) depreciation and/or amortization rates, the values in the Formula Rate shall be stated values specified in the Formula Rate and may be changed only pursuant to a FPA section 205 or section 206 proceeding~~; provided, however, that Grid Growth Ohio EHV may at its discretion and at a time of its choosing, make a limited, single-issue Section 205 filing to revise the stated depreciation rates and/or amortization rates. All parties reserve the right to contest such filing(s), but the sole issue in any such limited Section 205 proceeding shall be whether such proposed change is just and reasonable, and it shall not address other aspects of the Formula Rate.~~.

B. Unpopulated Formula Rate line items: with respect to line items in the Formula Rate that are not currently populated with non-zero numerical values because FERC policy requires prior authorization for recovery of the underlying costs or because, due to the nature of the associated functional activities, such costs are not considered part of Grid Growth Ohio EHV's transmission-related revenue requirement (but not line items that are zero values in a particular Rate Year for the sole reason that no such costs or revenues were incurred or revenues received or projected to be incurred or received during the Rate Year), such line items shall not be populated with non-zero values except as may be authorized following a FPA section 205 or section 206 proceeding.

Section IX. Competitive Concessions

A. For transmission development projects assigned to Grid Growth Ohio EHV as a result of the PJM competitive proposal process, Grid Growth Ohio EHV may, in its sole discretion, agree with PJM to apply a competitive concession that will result in a lower Net Revenue Requirement on a project-specific basis than that which would otherwise be produced by the Grid Growth Ohio EHV Attachment H-40A Formula Rate. Any competitive concession will appear as a zero or negative input to the formula, and will be determined on a project-specific basis using a workpaper that will be provided to Interested Parties as supporting documentation for each Grid Growth Ohio EHV Annual Update.

~~B.~~

ATTACHMENT H-41B

Formula Rate Implementation Protocols
Grid Growth Ohio, LLC ("Grid Growth Ohio")

ANNUAL TRUE-UP, INFORMATION EXCHANGE, AND CHALLENGE PROCEDURES

Definitions

"Actual Transmission Revenue Requirement" or "ATRR" means the actual net transmission revenue requirement of Grid Growth Ohio calculated and posted on the PJM website[1] no later than June 15 of each year subsequent to calendar year 2026 for the immediately preceding calendar year in accordance with Grid Growth Ohio's Formula Rate and based upon Grid Growth Ohio's actual costs and expenditures.

"Annual Update" means Grid Growth Ohio's ATRR for the preceding calendar year, as well as the True-up for the prior Rate Year, as posted on or before June 15 of each year.

"Formal Challenge" means a written challenge to an Annual Update or Projected Transmission Revenue Requirement submitted to the Federal Energy Regulatory Commission (the "Commission" or "FERC") as provided in Section IV below.

"Formula Rate" means the collection of formulas and worksheets included as Attachment H-41A of the PJM Tariff.

"Informational Filing" means the informational filing to FERC containing Grid Growth Ohio's, as applicable: (1) the PTRR for the upcoming Rate Year, as filed on or before October 31 of each year, and (2) the ATRR for the preceding calendar year, as well as its related True-up to the PTRR for the respective Rate Year, as filed on or before June 15 of each year.

"Interested Parties" include, but are not limited to, customers under the PJM Tariff, state utility regulatory commissions, the Organization of PJM States, Inc., consumer advocacy agencies, state attorneys general, and any party to any docket assigned by the Commission to Grid Growth Ohio's Formula Rate Filing and Annual Update.

"PJM Tariff" means the Open Access Transmission Tariff of the PJM Interconnection, L.L.C.

"Preliminary Challenge" means a written challenge to the Annual Update or Projected Transmission Revenue Requirement submitted to Grid Growth Ohio as provided in Section IV below.

"Projected Transmission Revenue Requirement" or "PTRR" means the projected net transmission revenue requirement of Grid Growth Ohio calculated for the forthcoming Rate

[1] The posting of revenue requirement information to the PJM website will cause such information to be accessible via PJM's OASIS at the "Transmission Owner Formula Rates" link on OASIS.

Year, as well as, where applicable, the most recently calculated True-up, with interest, to be posted on the PJM website[2] no later than October 31 of each year for rates effective the next calendar year starting January 1.

"Protective Agreement and Non-Disclosure Certificate" means the agreement and certificate executed by Interested Parties and their representatives for a Rate Year in order to obtain access to material that Grid Growth Ohio deems confidential or that contains Critical Energy Infrastructure Information as that term is defined in 18 C.F.R. § 388.113(c)(1) (2024).

"Protocols" means these Protocols, included as Attachment H-41B of the PJM Tariff.

"Publication Date" means the date on which the Annual Update is posted on the PJM website.[3]

"Rate Year" means the twelve consecutive month period that begins on January 1 and continues through December 31.

"Transmission Provider" means PJM Interconnection, L.L.C., or its successor or assignee.

"True-up" means the difference between the revenues received by Grid Growth Ohio corresponding to the rate effective period of the PTRR (net of the True-up from the prior year) and the ATRR, for the same Rate Year, which shall be provided in the Annual Update on or before June 15 of the year subsequent to the Rate Year. The True-up will be a component of the PTRR.

Section I. Applicability

The following procedures shall apply to Grid Growth Ohio's calculation of its Actual Transmission Revenue Requirement, True-up, and Projected Transmission Revenue Requirement.

Section II. Annual Update and Projected Transmission Revenue Requirement

A. On or before June 15 of each year subsequent to calendar year 2026, commencing at the time that Grid Growth Ohio's formula rate is initially populated, Grid Growth Ohio shall determine its Annual Update for the immediately preceding calendar year under Attachment H-41A and Section VII of these Protocols, including calculation of the True-up to be included in its PTRR for the subsequent Rate Year.

B. On or before June 15 of each year subsequent to calendar year 2026, commencing at the time that Grid Growth Ohio's formula rate is initially populated, Grid Growth Ohio shall:

[2] *See* note 1.

[3] *See* note 1.

1. provide its Annual Update for the immediately preceding calendar year ~~and Protective Agreement and Non-Disclosure Certificate~~ to PJM and cause such information to be posted on the PJM website;[4] and

2. provide notice of such posting via the e-mail exploder list for Grid Growth Ohio.

C. Commencing at the time that Grid Growth Ohio's formula rate is initially populated, on or before October 31, Grid Growth Ohio shall:

1. provide its PTRR to PJM and cause such information to be posted on the PJM website, in both a Portable Document Format ("PDF") and fully-functioning Excel file, and

2. provide notice of such posting via the e-mail exploder list for Grid Growth Ohio.

D. If transmission plant is projected to be placed in service (PTRR) or actually placed in service (ATRR) in the respective rate period, at an amount other than on a historic cost basis (e.g., fair value adjustments), Grid Growth Ohio will provide a worksheet identifying such transmission plant and a narrative explanation of the individual impact of such items to the Annual Update.

E. The ATRR shall:

1. Include a workable data-populated version of the Formula Rate template and underlying work papers in Excel format with all formulas and links intact;

2. Be based on Grid Growth Ohio's FERC Form No. 1 for the prior calendar year;

3. Provide the Formula Rate calculations and all inputs thereto, as well as supporting documentation and work papers for data that are used in the ATRR that are not otherwise available in the FERC Form No. ls~~, subject to the protection of any confidential information, as needed, under the Protective Agreement and Non-Disclosure Certificate~~;

4. Provide sufficient information to enable Interested Parties to replicate the calculation of the ATRR results from the FERC Form No. ls;

5. Identify any changes in the formula references (page and line numbers) to the FERC Form No. ls;

6. Identify and, to the extent not explained in a worksheet included in the ATRR, explain, all material adjustments made to the FERC Form No. 1 data in determining formula inputs, including relevant footnotes to the FERC Form No. ls and any adjustments not shown in the FERC Form No. ls;

[4] *See* note 1.

7. Provide underlying data for Formula Rate inputs that provide greater granularity than is required for the FERC Form No. 1;

8. As part of the ATRR open meeting, Grid Growth Ohio shall provide a summary of the actual year results to the PTRR for the same rate period, to accompany further discussion of key drivers of the ATRR and PTRR.

9. With respect to any change in accounting that affects inputs to the Formula Rate or the resulting charges billed under the Formula Rate ("Accounting Change"):

    a. Identify any Accounting Change, including:

        i. the initial adoption of a new 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 affect the ATRR and True-up calculation;

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

        v. changes to income tax elections; and

        vi. the initial implementation of accounting changes in the reporting of the FERC Form No. 1 accounts from the prior year to the current year to the extent such change(s) affect(s) the Formula Rate revenue requirement: changes in (1) FERC's Uniform System of Accounts, (2) FERC Form No. 1 reporting requirements as applicable, (3) any FERC ratemaking orders applicable to the Formula Rate, and (4) the accounting policies of Grid Growth Ohio.

    b. Identify items included in the ATRR 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 ATRR;

    d. Provide, for each Accounting Change, a narrative explanation of the individual impact of such change on the ATRR; and

10. Include for the applicable Rate Year the following information related to affiliate cost allocation: (A) a detailed description of the methodologies used to allocate and directly assign costs between Grid Growth Ohio and its affiliates by service

category and function, including any changes to such cost allocation methodologies from the prior year, and the reasons and justification for those changes; and (B) the magnitude of such costs that have been allocated or directly assigned between Grid Growth Ohio and each affiliate by service category or function.

F. It is the intent of the Formula Rate, including the supporting explanations and allocation described therein, that each input to the Formula Rate will be either taken directly from FERC Form No. 1 or reconcilable to FERC Form No. 1 by the application of clearly identified and supported information. If the referenced form is superseded, the successor form(s) shall be utilized and supplemented as necessary to provide equivalent information as that provided in the superseded form. If the referenced form(s) is (are) discontinued, equivalent information as that provided in the discontinued form(s) shall be utilized.

G. The PTRR shall:

1. Include a workable data-populated version of the Formula Rate template and underlying work papers in Excel format with all formulas and links intact;

2. Provide the Formula Rate calculations and all inputs thereto, as well as supporting documentation and work papers for data that are used in the PTRR;

3. Provide sufficient information to enable Interested Parties to replicate the calculation of the PTRR. If transmission plant is projected to be placed in service (PTRR) or actually placed in service (ATRR) in the respective rate period at an amount other than on a historic cost basis (e.g., fair value adjustments), Grid Growth Ohio will provide a worksheet identifying such transmission plant and a narrative explanation of the individual impact of such items to the Annual Update;

4. With respect to any Accounting Change:

a. Identify any Accounting Change, including:

i. the initial adoption of a new 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 affect the PTRR calculation;

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

v. changes to income tax elections;

vi. the initial implementation of accounting changes in the reporting of the FERC Form 1 accounts from the prior year to the current year to the extent such change(s) affect(s) the Formula Rate revenue requirement: changes in (1) FERC's Uniform System of Accounts, (2) FERC Form No. 1 reporting requirements as applicable, (3) any FERC ratemaking orders applicable to the Formula Rate, and (4) the accounting policies of Grid Growth Ohio.

b. Identify items included in the PTRR 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 PTRR; and

d. Provide, for each Accounting Change, a narrative explanation of the individual impact of such change on the PTRR.

H. If the date for posting the Annual Update or PTRR falls on a weekend or a holiday recognized by FERC, then the posting shall be due on the next business day. The date on which posting of the Annual Update occurs shall be that year's Publication Date. Any delay in the Publication Date or in the posting of the PTRR will result in an equivalent extension of time for the submission of information requests discussed in Section III of these Protocols.

I. Commencing at the time that Grid Growth Ohio's formula rate is initially populated, Grid Growth Ohio shall hold an open meeting among Interested Parties ("Annual Update Meeting"), to be conducted via Internet webcast, no earlier than ten (10) business days following the Publication Date and no later than July 15. No fewer than seven (7) calendar days prior to such Annual Update Meeting, Grid Growth Ohio shall provide notice on PJM's website of the time and date of the Annual Update Meeting, and shall provide notice of the posting via the e-mail exploder list for Grid Growth Ohio. The Annual Update Meeting shall: (i) permit Grid Growth Ohio to explain and clarify its ATRR and True-up; and (ii) provide Interested Parties an opportunity to seek information and clarifications from Grid Growth Ohio about the ATRR and True-up.

J. Commencing at the time that Grid Growth Ohio's formula rate is initially populated, Grid Growth Ohio shall hold an open meeting among Interested Parties ("Annual Projected Rate Meeting"), to be conducted via Internet webcast, no earlier than seven (7) business days following the posting of the PTRR (as described in Section II.C of these Protocols) and no later than November 30. No fewer than seven (7) calendar days prior to such Annual Projected Rate Meeting, Grid Growth Ohio shall provide notice on PJM's website of the time and date of the Annual Projected Rate Meeting, and shall provide notice of the posting via the e-mail exploder list for Grid Growth Ohio. The Annual

Projected Rate Meeting shall: (i) permit Grid Growth Ohio to explain and clarify its PTRR and (ii) provide Interested Parties an opportunity to seek information and clarifications from Grid Growth Ohio about the PTRR.

Section III. Information Exchange Procedures

Each Annual Update and PTRR shall be subject to the following information exchange procedures ("Information Exchange Procedures"):

A. Commencing at the time that Grid Growth Ohio's formula rate is initially populated, Interested Parties shall have until August 31 following the Annual Update posting date (unless such period is extended with the written consent of Grid Growth Ohio or by FERC order) to serve a first set of information and document requests on Grid Growth Ohio pertaining to the Annual Update. Interested parties shall have until January 15 to serve follow-up information and document requests pertaining to the Annal Update (together with the August 31 deadline, the "ATRR Information Exchange Period")~~, but such requests must be specifically limited to clarification or additional information regarding Grid Growth Ohio's responses provided to any sets of information and document requests issued to Grid Growth Ohio on or before August 31.~~.

Interested Parties shall have until January 15 following the PTRR posting date (unless such period is extended with the written consent of Grid Growth Ohio or by FERC order) to serve reasonable information and document requests on Grid Growth Ohio pertaining to the PTRR ("PTRR Information Exchange Period"). If August 31 or January 15 falls on a weekend or a holiday recognized by FERC, the deadline for submitting all information and document requests shall be extended to the next business day. Such information and document requests shall be limited to what is necessary to determine:

1. the extent or effect of an Accounting Change on the inputs to the Formula Rate or the resulting charges under the Formula Rate;

2. whether the ATRR or PTRR fails to include data properly recorded in accordance with these Protocols;

3. the proper application of the Formula Rate and procedures in these Protocols;

4. the accuracy of data and consistency with the Formula Rate of the calculations shown in the ATRR or PTRR;

5. the prudence of actual costs and expenditures included in the ATRR or the reasonableness of projected costs and expenditures included in the PTRR;

6. the effect of any change to the underlying Uniform System of Accounts or FERC Form No. 1; or

7. any other information that may reasonably have a substantive effect on the calculation of the charge pursuant to the Formula Rate.

The information and document requests shall not be directed to ascertaining whether the Formula Rate is just and reasonable.

B. Grid Growth Ohio shall make a good faith effort to respond to any information and document request within fifteen (15) business days of receipt of such request. Commencing at the time that Grid Growth Ohio's formula rate is initially populated, Grid Growth Ohio shall respond to all information and document requests by no later than February 25 following the Publication Date, unless the ATRR Information Exchange Period or PTRR Information Exchange Period is extended with written consent of Grid Growth Ohio or by FERC order.

C. Grid Growth Ohio shall not claim that responses to information and document requests provided pursuant to these Protocols are subject to any settlement privilege in any proceeding addressing Grid Growth Ohio's Annual Update or PTRR, and such responses may be included in any Formal Challenge or other submittal addressing Grid Growth Ohio's Annual Update or PTRR.

D. Grid Growth Ohio shall use best efforts to timely notify the proponent of an Information Request if all or any part of an Information Request is unclear or the subject matter is outside the scope of Section III.B. If the parties are unable to resolve any dispute regarding an information request, the matter may be referred to the FERC Dispute Resolution Service.

Section IV. Challenge Procedures

A. Interested Parties shall have until March 31 following the Publication Date (unless such period is extended with the written consent of Grid Growth Ohio or by FERC order) ("Review Period") to review the inputs, supporting explanations, allocations and calculations and to notify Grid Growth Ohio in writing, which may be made electronically, of any specific Preliminary Challenges to the Annual Update or PTRR. If the final day of the Review Period falls on a holiday recognized by FERC, the deadline for submitting all Preliminary Challenges shall be extended to the next business day. An Interested Party may not pursue a Formal Challenge unless it submitted a Preliminary Challenge on some issue (which may be different from the Formal Challenge issue) during the applicable Review Period. Failure to raise an issue in one year's Formal Challenge shall not bar the lodging of that issue as related to a subsequent Annual Update or PTRR. This Section IV.A in no way shall affect a party's rights under Federal Power Act ("FPA") section 206 as set forth in Section IV.I of these Protocols.

B. Preliminary Challenges shall be subject to the resolution procedures and limitations in this Section IV. Preliminary Challenges shall be filed pursuant to these Protocols and shall satisfy all of the following requirements.

1. A party submitting a Preliminary Challenge to Grid Growth Ohio must specify the inputs, supporting explanations, allocations, calculations, or other information to which it objects, and provide an explanation and documents to support its challenge.

2. Grid Growth Ohio shall make a good faith effort to respond to any Preliminary Challenge within twenty (20) business days of written receipt of such challenge.

3. Grid Growth Ohio, and where applicable, PJM, shall appoint a senior representative to work with each party that submitted a Preliminary Challenge (or its representative) toward a resolution of the challenge.

4. If Grid Growth Ohio disagrees with such challenge, they will provide the Interested Party(ies) with a written explanation supporting the inputs, supporting explanations, allocations, calculations, or other information.

5. No Preliminary Challenge may be submitted after March 31, and Grid Growth Ohio must respond to all Preliminary Challenges by no later than April 30 unless the Review Period is extended with written consent of Grid Growth Ohio or by FERC order, or as provided in Section IV.A above.

6. Grid Growth Ohio will serve all Preliminary Challenges and its response(s) to such Preliminary Challenges upon any Interested Party that requests such service, subject to the protection of any confidential information contained in such Preliminary Challenges or responses, as needed, under the Protective Agreement and Non-Disclosure Certificate.

C. Formal Challenges shall be subject to the resolution procedures and limitations in this Section IV. Formal Challenges shall be filed pursuant to these Protocols and shall satisfy all of the following requirements.

1. A Formal Challenge shall:

a. Clearly identify the action or inaction which is alleged to violate the filed Formula Rate or these Protocols;

b. Explain how the action or inaction violates the filed Formula Rate or these Protocols;

c. 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:

i. the extent or effect of an Accounting Change;

ii. whether the ATRR or PTRR 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 charges shown in the ATRR or PTRR;

v. the prudence of actual costs and expenditures;

vi. the effect of any change to the underlying Uniform System of Accounts or FERC Form No. 1; or

vii. any other information that may reasonably have a substantive effect on the calculation of the charge pursuant to the Formula Rate.

d. 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 challenged action or inaction;

e. State whether the claim(s) 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;

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

g. 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

2. Service. Any person filing a Formal Challenge must serve a copy of such Formal Challenge on Grid Growth Ohio. Service to Grid Growth Ohio must be simultaneous with filing at FERC. Simultaneous service can be accomplished by electronic mail in accordance with 18 C.F.R. § 385.2010, express delivery, or messenger. A party filing a Formal Challenge shall serve the individual listed as the contact person on Grid Growth Ohio's Informational Filing required under Section VI of these Protocols.

D. Preliminary and Formal Challenges shall be limited to all issues that may be necessary to determine:

1. the extent or effect of an Accounting Change;

2. whether the ATRR or PTRR fails to include data properly recorded in accordance with these Protocols, or includes data not properly recorded in accordance with these Protocols;

3. the proper application of the Formula Rate and procedures in these Protocols;

4. the accuracy of data and consistency with the Formula Rate of the calculations shown in the ATRR and PTRR;

5. the prudence of actual costs and expenditures included as inputs to the Formula Rate;

6. the reasonableness of any projection that forms a basis of the PTRR;

7. the effect of any change to the underlying Uniform System of Accounts or FERC Form No. 1; or

8. any other information that may reasonably have a substantive effect on the calculation of the charge pursuant to the Formula Rate.

E. Any changes or adjustments to the ATRR and PTRR resulting from the information exchange and Preliminary Challenge processes that are agreed to by Grid Growth Ohio will be reported in the applicable Informational Filing required pursuant to Section VI of these Protocols. Any such changes or adjustments agreed to by Grid Growth Ohio on or before December 1 will be reflected in the PTRR for the upcoming Rate Year. Any changes or adjustments agreed to by Grid Growth Ohio after December 1 will be reflected in the following year's Annual Update, as discussed in Section V of these Protocols.

F. An Interested Party shall have until June 1 following the Review Period (unless such date is extended with the written consent of Grid Growth Ohio to continue efforts to resolve the Preliminary Challenge) to make a Formal Challenge with FERC, which shall be served on Grid Growth Ohio on the date of such filing as specified in Section IV.C.2 above. A Formal Challenge shall be filed in the same docket as Grid Growth Ohio's Informational Filing discussed in Section VI of these Protocols. Grid Growth Ohio shall respond to the Formal Challenge by the deadline established by FERC.

G. In any proceeding initiated by FERC concerning the Annual Update or PTRR or in response to a Formal Challenge, Grid Growth Ohio shall bear the burden, consistent with FPA section 205, of proving 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 the Formula Rate. Nothing herein is intended to alter the burdens applied by FERC with respect to prudence challenges.

H. Except as specifically provided herein, nothing herein shall be deemed to limit in any way the right of Grid Growth Ohio to file unilaterally, pursuant to FPA section 205 and the regulations thereunder, to change these Protocols, the Formula Rate, or any of its inputs (including, but not limited to, rate of return and transmission incentive rate treatment), or to replace the Formula Rate with a stated rate, or the right of any other party to request such changes pursuant to FPA section 206.

I. Grid Growth Ohio reserves the right to file under FPA section 205: (i) to modify the stated values for amortization and depreciation rates in the filed template, (ii) to reflect ministerial changes to the FERC Form 1 reporting requirements (i.e., changes in account descriptions or line numbers that do not reflect changes in the nature or type of costs or expenses recorded therein), or (iii) to seek recovery of prudently-incurred abandoned plant expenses. ~~Interested Parties may have the right to contest such filing(s), but the sole issue in any such limited Section 205 proceeding shall be whether the proposed limited change is just and reasonable, and it shall not address other aspects of the Formula Rate.~~

J. Any Interested Party seeking changes to the application of the Formula Rate due to a change in the Uniform System of Accounts or FERC Form No. 1 shall first raise the matter with Grid Growth Ohio in accordance with this Section IV before pursuing a Formal Challenge.

Section V. Changes to Actual Transmission Revenue Requirement or Projected Transmission Revenue Requirement

Except as provided in Section IV.E of these Protocols, any changes to the data inputs, including but not limited to revisions to Grid Growth Ohio's FERC Form No. 1, or as the result of any FERC proceeding to consider the ATRR or PTRR, or as a result of the procedures set forth herein, shall be incorporated into the Formula Rate and the charges produced by the Formula Rate in the PTRR for the next Rate Year. This true-up mechanism shall apply in lieu of mid-Rate Year adjustments. Interest on any refund or surcharge shall be calculated in accordance with the procedures outlined in Section VII of these Protocols.

Section VI. Informational Filings

A. Commencing at the time that Grid Growth Ohio's formula rate is initially populated, Grid Growth Ohio shall submit to FERC informational filings (Informational Filing) of its PTRR for the Rate Year or ATRR for the Rate Year as applicable under the respective procedures set forth in Section II. The relevant Informational Filing must include information that is reasonably necessary to determine:

1. that input data to the Formula Rate are properly recorded in any underlying work papers;

2. that Grid Growth Ohio has properly applied the Formula Rate and these Protocols;

3. the accuracy of data and the consistency with the Formula Rate of the transmission revenue requirement and rates under review;

4. the extent of Accounting Changes that affect Formula Rate inputs; and

5. the reasonableness of projected costs.

The Informational Filing must also describe any corrections or adjustments made during the period since the Publication Date, and must describe all aspects of the Formula Rate or its inputs that are the subject of an ongoing dispute under the Preliminary Challenge or Formal Challenge procedures.

Finally, the Informational Filing shall include for the applicable Rate Year the following information related to affiliate cost allocation: a detailed description of the methodologies used to allocate and directly assign costs between Grid Growth Ohio and its affiliates by service category or function, including any changes to such cost allocation methodologies from the prior Rate Year, and the reasons and justification for those changes; the magnitude of such costs that have been allocated or directly assigned between Grid Growth Ohio and each affiliate by service category or function; and a copy of any service agreement between Grid Growth Ohio and any affiliate that went into effect during the Rate Year.

On the date of submission to FERC, Grid Growth Ohio shall provide notice of the Informational Filing via the e-mail exploder list for Grid Growth Ohio and by posting the docket number assigned to Grid Growth Ohio's relevant Informational Filing on the PJM website~~, subject to the protection of any confidential information contained in the Informational Filing, as needed, under the Protective Agreement and Non-Disclosure Certificate.~~.[5]

B. Any challenges to the implementation of the Formula Rate must be made through the challenge procedures described in Section IV of these Protocols or in a separate complaint proceeding, and not in response to the Informational Filing.

Section VII. Calculation of True-up

The True-up will be determined in the following manner:

A. As part of the Annual Update for each Rate Year, Grid Growth Ohio shall determine the difference between the revenues received by Grid Growth Ohio corresponding to the rate effective period based on the PTRR for the Rate Year (net of the True-up from the prior year) and the ATRR for the same Rate Year based on actual cost data as reflected in its FERC Form No. 1. The True-up will be determined as follows:

1. The ATRR for the previous Rate Year as determined using Grid Growth Ohio's completed FERC Form No. 1 report shall be compared to the revenues received by Grid Growth Ohio corresponding to the rate effective period based on the PTRR (net of the True-up from the prior year) for that same Rate Year ("True-up Year") to determine any excess or shortfall in the revenues received by Grid Growth Ohio corresponding to the rate effective period in the True-up Year. The revenue excess or shortfall determined by this comparison shall constitute the "True-up."

2. Interest on any True-up shall be based on the interest rate equal to the interest rate determined by 18 C.F.R. § 35.19a. Interest rates will be used to calculate the time value of money for the period that the True-up exists. The interest rate to be applied to the True-up will be determined using the average rate for the twenty

[5] *See* note 1.

(20) months preceding September 1 of the current year. Interest on refunds and surcharges shall be compounded on a quarterly basis.

B. Grid Growth Ohio will post on PJM's website all information relating to the True-up as part of the Annual Update. As provided in Section II.B of these Protocols, Grid Growth Ohio shall provide its Annual Update for the immediately preceding calendar year to PJM and cause such information to be posted on the PJM website on or before June 15 of each year subsequent to calendar year 2026.

Section VIII. Formula Rate Inputs

A. Fixed components to the Formula Rate: for (i) rate of return on common equity; and (ii) depreciation and/or amortization rates, the values in the Formula Rate shall be stated values specified in the Formula Rate and may be changed only pursuant to a FPA section 205 or section 206 proceeding~~; provided, however, that Grid Growth Ohio may at its discretion and at a time of its choosing, make a limited, single-issue Section 205 filing to revise the stated depreciation rates and/or amortization rates. All parties reserve the right to contest such filing(s), but the sole issue in any such limited Section 205 proceeding shall be whether such proposed change is just and reasonable, and it shall not address other aspects of the Formula Rate.~~.

B. Unpopulated Formula Rate line items: with respect to line items in the Formula Rate that are not currently populated with non-zero numerical values because FERC policy requires prior authorization for recovery of the underlying costs or because, due to the nature of the associated functional activities, such costs are not considered part of Grid Growth Ohio's transmission-related revenue requirement (but not line items that are zero values in a particular Rate Year for the sole reason that no such costs or revenues were incurred or revenues received or projected to be incurred or received during the Rate Year), such line items shall not be populated with non-zero values except as may be authorized following a FPA section 205 or section 206 proceeding.

Section IX. Competitive Concessions

A. For transmission development projects assigned to Grid Growth Ohio as a result of the PJM competitive proposal process, Grid Growth Ohio may, in its sole discretion, agree with PJM to apply a competitive concession that will result in a lower Net Revenue Requirement on a project-specific basis than that which would otherwise be produced by the Grid Growth Ohio Attachment H-41A Formula Rate. Any competitive concession will appear as a zero or negative input to the formula, and will be determined on a project-specific basis using a workpaper that will be provided to Interested Parties as supporting documentation for each Grid Growth Ohio Annual Update.

~~B.~~