



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET
HARRISBURG, PENNSYLVANIA 17120

March 25, 2026

Docket Nos. A-2026-3061170
G-2026-3061176
Utility Code: 111250

COURTNEY L SCHULTZ
SAUL EWING LLP
1735 MARKET STREET SUITE 3400
PHILADELPHIA PA 19103

Re: Application of American Transmission Systems, Incorporated for the Acquisition of Certain Real Property from The Cleveland Illuminating Company and for the associated Affiliate Transaction.

Dear Ms. Schultz:

On March 17, 2026, American Transmission Systems, Incorporated (ATSI) filed an application for the acquisition of certain electric distribution facilities from The Cleveland Illuminating Company (CEI) and for the associated affiliate transaction. In order for us to complete our analysis of the subject application, the Bureau of Technical Utility Services requires answers to the enclosed data requests. This information is necessary for completion of our review of the filing.

Please forward the requested information to the Secretary of the Commission **within five (5) days** of receipt of this letter. Failure to respond may result in the Application being denied. As well, if ATSI or CEI has decided to withdraw its filing, please reply notifying the Commission of such a decision.

All documents requiring notary stamps must have original signatures. The Commission strongly encourages submission through efilings with the Secretary of the Commission by opening an efilings account through the Commission's website and accepting eservice at <https://efiling.puc.pa.gov>. The Commission is accepting all public documents through our efilings system at this time.

If your filing contains confidential material, you are required to either file by overnight delivery or submit to the Secretary's Share Point File system to ensure the timely filing of your submission. Filers should contact the Secretary's Bureau in advance to gain access to the Share Point File system. Make sure to reference the Docket Number listed above when filing your response and mark the materials "CONFIDENTIAL" in bold or highlighted manner if any of the requested information is deemed to be of a confidential nature.

The overnight address for hard-copy or confidential responses is:

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
400 North Street, 2nd Floor
Harrisburg, PA 17120


Your answers should be verified per 52 Pa Code § 1.36. Accordingly, you must provide the following statement with your responses:

I, [print name of appropriate company representative], hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Signature _____
Title _____
Date _____

In addition, to expedite analysis of the Application, send a copy of your response to Jordan Van Order at jvanorder@pa.gov. If any problems arise that prevent a full timely response or if any clarification of these data requests is needed, contact Jordan Van Order, Bureau of Technical Utility Services, at jvanorder@pa.gov (preferred) or 717-787-8763.

Sincerely,



Matthew L. Homsher
Secretary

Enclosure

Bureau of Technical Utility Services
Data Requests
Docket No. A-2026-3061170 and G-2026-3061176

- A-1 Reference the Application, Page 1. Please confirm the transaction between affiliates is limited to the acquisition of Lot #1 by ATSI from CEI.
- A-2 Reference the Application, Page 1. Please provide a detailed explanation as to why the sale needs to be closed on May 1, 2026.
- A-3 Reference the Application, Paragraph 3. Please provide a general description of The Cleveland Electric Illuminating Company.
- A-4 Reference the Application, Paragraph 3. Please provide an organizational chart which clearly shows the relationship between ATSI and CEI.
- A-5 Reference the Application, Paragraph 3. Please explain whether ATSI has made a similar filing with the Public Utilities Commission of Ohio. If so, please state the status of the filing. If not, please provide a detailed explanation as to why.
- A-6 Reference the Application, Paragraph 20. The filing appears to include more than one Exhibit C. Please explain.
- A-7 Reference the Application, Paragraph 21. Please provide a detailed explanation as to why the current location of FirstEnergy employees who work primarily on transmission is not adequate.
- A-8 Reference the Application, Paragraph 21. Please provide a detailed explanation as to why the acquisition of Lot #1 is necessary.
- A-9 Reference the Application, Paragraph 21. Please explain whether the acquisition will result in increased operating costs to ATSI. If so, please quantify these costs.
- A-10 Reference the Real Estate Purchase Agreement, Section 2. Please explain how ATSI will finance the purchase of the CEI property.
- A-11 Reference the Real Estate Purchase Agreement, Section 4. Please explain whether inspections of the property and buildings have been completed. If so, please provide a detailed description of the conditions and provide photos documenting the interior condition of the buildings.
- A-12 Reference the Real Estate Purchase Agreement, Section 4. Please explain whether any repairs or upgrades are necessary prior to ATSI occupying the subject property or buildings. Additionally, please provide the approximate cost associated with these repairs or upgrades.
- A-13 Reference the Application, Exhibit C, Question No. 10. Please state the approximate dollar amount that will be allocated to rate payers in the Commonwealth of Pennsylvania.

A-14 Reference the Application, Exhibit C, Question No. 10. Please state the name of any other entity that will be allocated a portion of the costs and provide the corresponding dollar amount.