

April 10, 2026

Via E-File

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105

Re: American Transmission Systems, Incorporated, Application for the Acquisition of Certain Real Property from The Cleveland Illuminating Company - Docket Nos. A-2026-3061170, G-2026-3061176

Dear Secretary Homsher:

On behalf of American Transmission Systems, Incorporated (“ATSI”) please accept this filing made in connection with the above-referenced action, filed with the Commission on April 13, 2026. The Bureau of Technical Utility Services is reviewing the filing and asked via letter dated April 8, 2026 that ATSI address certain requests for additional information. Those requests are addressed herein.

Please do not hesitate to contact me if you have any questions.

Sincerely,



Courtney L. Schultz

Encls.

Cc: Jordan Van Order (via E-Mail jvanorder@pa.gov)
Per Certificate of Service

TUS Request No. 15:

Reference the Application, Paragraph 13. Please provide a complete list of all fixtures, appurtenant rights, and interests to be transferred.

RESPONSE:

With respect to fixtures and appurtenances, given that the facility will be renovated following the transfer, only the following fixtures are anticipated to remain and be transferred: HVAC Systems, Electrical Systems, Plumbing Systems, Built-in Cabinets, Light fixtures, and Elevator Equipment. All interests to be transferred are set forth in the Agreement.

TUS Request No. 16:

Reference the Application, Exhibit A. Please provide a fully executed copy of the Agreement.

RESPONSE:

ATSI does not have an executed copy of the Agreement, because it is ATSI's standard practice not to execute an affiliate agreement until after all necessary regulatory approvals have been obtained, including from the Commission. This practice was adopted years ago, based on feedback received in other affiliate interest agreement proceedings filed by ATSI's affiliates in Pennsylvania where it was requested that executed agreements not be submitted with filings seeking approval of those agreements, i.e., presuming approval. ATSI is willing to promptly file an executed copy of the Agreement (which is in final form as presented in Exhibit A) with the Commission for compliance purposes, if its request for approval to enter into the affiliated transaction is approved.

TUS Request No. 17:

Reference the Application, Exhibit C, Question No. 5. Please provide a copy of the financial analysis.

RESPONSE:

In Q1-Q2 2025, ATSI worked with an outside Real Estate consultant, Newmark, to study and provide real estate options that align with the Transmission & Power Delivery short- and long-term needs for facility optimization. Several scenarios were considered, and ultimately, Scenario 1, purchase NRHQ and renovate, showed the lowest long-term cost investment in terms of cash flow over a 10-year period. The analysis included the estimated purchase price of approximately \$7M and renovation costs of approximately \$23.5M. A copy of the analysis and the supporting workpapers, which are confidential have been

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marked as TUS-17 Attachment 1 (Confidential) and TUS-17 Attachment 2 (Confidential) (Excel Only), will be uploaded to the Commission's Sharefile site.

TUS Request No. 18:

Reference the Application, Exhibit C, Question No. 5 and ATSI Data Request Response No. 12. Please explain whether the \$20-25 million in facility renovations were considered in the financial analysis.

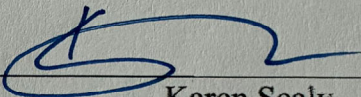
RESPONSE:

Yes, please refer to the response to TUS-17, above.

VERIFICATION

I, Karen Sealy, Corporate Secretary for American Transmission Systems, Incorporated ("ATSI"), hereby state that the facts set forth in the letter of Counsel for ATSI dated April 10, 2020, addressing information requests of the Bureau of Technical Utility Services in the matter at Docket Nos. A-2026-3061170 and G-2026-3061176 are true and correct to the best of my knowledge, information and belief, and 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).

Dated: April 10, 2026



Karen Sealy

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**APPLICATION OF AMERICAN
TRANSMISSION SYSTEMS,
INCORPORATED (“ATSI”) FOR
EXPEDITED APPROVAL, PURSUANT
TO 66 PA.C.S. §§ 1102(A)(3) AND 2102,
OF ACQUISITION OF REAL
PROPERTY FROM AFFILIATED
INTEREST, CLEVELAND ELECTRIC
ILLUMINATING COMPANY** :
:
: **Docket No.: A-2026-3061170**
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the entities listed below in accordance with the requirements of 52 Pa. C.S. § 1.54 (relating to service by a participant) via email:

Darryl Lawrence
Office of Consumer Advocate
555 Walnut Street, 5th Floor
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pdiskin@pa.gov
dgill@pa.gov

Dated: April 10, 2026

/s/ Courtney L. Schultz

Courtney L. Schultz, Esq.
Devan McCarrie, Esq.
Saul Ewing LLP
*Counsel for American Transmission
Systems, Incorporated*