# ALSTON\&BiRDup 

The Atlantic Building 950 F Street, NW
Washington, DC 20004-1404

202-239-3300
Fax: 202-239-3333
www.alston.com

May 1, 2014
The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

## Re: American Transmission Systems, Incorporated Informational Filing 2014 Transmission Formula Rate Annual Update Docket No. ER11-3508-000

## Dear Secretary Bose:

American Transmission Systems, Incorporated ("ATSI") hereby submits for informational purposes only its 2014 Transmission Formula Rate Annual Update as required under Attachment H-21B (Formula Rate Implementation Protocols) (the "ATSI Protocols") under the Open Access Transmission Tariff ("OATT") of PJM Interconnection, L.L.C. ("PJM"). As provided in Section 1.b of the ATSI Protocols, this 2014 Annual Update is an informational filing, and therefore does not require any Commission action.

## Description of Filing

ATSI makes its transmission facilities available on an open access basis under the PJM OATT. ATSI recovers its transmission revenue requirements through a formula rate that is designated as Attachment $\mathrm{H}-21$ under the PJM OATT. ${ }^{1}$ Pursuant to the ATSI Protocols, on or before May 1 of each year, ATSI is required to recalculate its annual transmission revenue requirements, producing the "Annual Update" for the upcoming rate year. ${ }^{2}$ ATSI is required to submit the Annual Update as an informational filing with the Commission. The annual transmission revenue requirements identified in the Annual Update are used to derive the Network Integration Transmission Service and Point-to-Point rates under the PJM OATT for service in the ATSI zone.

1 Certain aspects of ATSI's formula rate are pending on rehearing and compliance in Docket Nos. ER11-2814, et al.

The revenue requirements submitted in this Annual Update will be used to derive the transmission rates for service on and after June 1, 2014 through May 31, 2015. Each input to the formula rate is either taken directly from the FERC Form No. 1 or reconcilable to the FERC Form No. 1 by the application of clearly identified and supported information. ${ }^{3}$ The Annual Update is subject to the review procedures set forth in Section 2 of the ATSI Protocols.

The Annual Update is attached to this filing as Attachment A. It includes ATSI's formula rate template, which includes Attachment H-21A and Appendices A-G, populated, where appropriate, with inputs for 2014 . Workpapers that support the Annual Update are attached as Attachment B. Each of the supporting workpapers is separately described below.

Workpaper 1 - Other Electric Revenue: Supporting the value listed in Attachment H-21A, Page 4, Line 35.

Workpaper 2 - Revenue Credit Adjustment: Supporting the value listed in Appendix G (Revenue Credit Adjustment Worksheet), Column 3 (Firm PTP and NITS Revenue Included in Rates Excluding True-Up, June - December 2011).

Workpaper 3 - Input Calculations for Appendix G: Supporting values listed in Appendix G (Revenue Credit Adjustment Worksheet), Columns 2, 3, and 5.

Workpaper 4 - Accumulated Deferred Investment Tax Credits (Account 255): Supporting the value for Account 255 that appears in Attachment H-21A, Page 2, Line 23.

Workpaper 5 - Deferred Income Tax Rate: Supporting the deferred income tax rate listed in Attachment H-21A, Appendix G, Line 3 and supporting the Federal income tax rate and Composite State income tax rate in Attachment H-21A, Page 5, Note K.

[^0]
# Workpaper 6 - FAS 109 Deferred Income Taxes Depreciation Adjustment: Supporting the values listed in Attachment H-21A, Page 2, Column 3, Lines 20 and 21. 

Workpaper 7 - Taxes Other Than Income Taxes Reconciliation: Supporting the value used to adjust Property Tax listed in Attachment H21A, Page 3, Column 3, Line 16.

Workpaper 8 - General Advertising Reconciliation: Supporting the value used to adjust Line 5a in Attachment H-21A, Page 3, Column 3.

Workpaper 9 - General \& Intangible Accumulated Depreciation: Supporting the value listed in Attachment H-21A, Page 2, Column 3, Line 10.

Workpaper 10 - Stated values for: (i) rate of return on common equity; (ii) "Post- Employment Benefits Other Than Pension" pursuant to Statement of Financial Accounting Standards No. 106, Employers' Accounting for Postretirement Benefits Other Than Pensions charges; and (iii) depreciation and/or amortization rates.

Workpaper 11 - Asset Retirement Obligation Adjustments: Supporting the values listed in Attachment H-21A, Page 2, Column 3, Lines 2 and 8.

ATSI will submit this filing to PJM for posting on its website (www.pjm.com). Moreover, pursuant to Section 1.e of the ATSI Protocols, this Annual Update includes a "workable" Excel file or files containing the data-populated Formula Rate Template.

## Notice to Interested Parties

Pursuant to section 1.f (i) of the ATSI Protocols, notice is hereby given that a conference call open to all Interested Parties will be held on May 21, 2014 from 10:00 a.m. to $12: 00$ p.m. to discuss the Annual Update. The term "Interested Party" means any person or entity having standing under section 206 of the Federal Power Act with respect to the Annual Update. Any Interested Party wishing to join the conference call should RSVP to Rick Sparling, Alston \& Bird, LLP by phone (202-239-3077) or email (richard.sparling@alston.com) by May 20, 2014 to obtain the call-in information.

The Honorable Kimberly D. Bose
May 1, 2014
Page 4

## Communications

Communications with respect to this filing should be directed to:

Randall B. Palmer, Esq.<br>Senior Corporate Counsel II<br>FirstEnergy Service Company<br>800 Cabin Hill Drive<br>Greensburg, PA 15601<br>(724) 838-6894<br>rpalmer@firstenergycorp.com<br>Roger Ruch<br>Director, Rates Support<br>76 South Main Street<br>Akron, OH 44308<br>(330) 384-5130<br>ruchr@firstenergycorp.com<br>Kenneth G. Jaffe, Esq.<br>Richard P. Sparling, Esq.<br>Alston \& Bird LLP<br>950 F Street, NW<br>Washington, DC 20004<br>(202) 239-3300<br>kenneth.jaffe@alston.com<br>richard.sparling@alston.com

Please contact the undersigned if you have any questions.

Respectfully submitted,

## /s/Kenneth G. Jaffe

Kenneth G. Jaffe
Richard P. Sparling
Alston \& Bird LLP

Attorneys for American Transmission
Systems, Incorporated

Attachment A
2014 Annual Update

|  |  |  |  |  |
| :--- | :--- | :--- | :--- | :--- |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |


|  |  |  |  |
| :--- | :--- | :--- | :--- |
|  |  |  |  |
|  |  |  |  |


|  |  |  |  |
| :--- | :--- | :--- | :--- |
|  |  |  |  |

Formula Rate - Non-Levelized

Rate Formula Template Utilizing FERC Form 1 Data

American Transmission Systems, Inc



General Note: References to pages in this formulary rate are indicated as: (page\#, line\#, col.\#) References to data from FERC Form 1 are indicated as: \#.y.x (page, line, column)
Note
$\underline{\text { Letter }}$
A As provided by PJM and in effect at the time of the annual rate calculations pursuant to Section 34.1 of the PJM OATT. The percentage of load served below 138 kV for the ATSI zone shall be updated annually in accordance with the settlement agreement in Docket No. ER05-285.
B Peak as would be reported on page 401, column d of Form 1 at the time of the zonal peak for the twelve month period ending October 31 of the calendar year used to calculate rates. The percentage of load served below 138 kV for the ATSI zone shall be updated annually in accordance with the settlement agreement in Docket No. ER05-285.
C Reserved
D Reserved
E Reserved
F The balances in Accounts 190, 281, 282 and 283, as adjusted by any amounts in contra accounts identified as regulatory assets or liabilities related to FASB 106 or 109 . Balance of Account 255 is reduced by prior flow throughs and excluded if the utility chose to utilize amortization of tax credits against taxable income as discussed in Note K. Account 281 is not allocated.

G Identified in Form 1 as being only transmission related.
H Cash Working Capital assigned to transmission is one-eighth of O\&M allocated to transmission at page 3, line 8, column 5. Prepayments are the electric related prepayments booked to Account No. 165 and reported on Page 111, line 57 in the Form 1.
I Line 5 - EPRI Annual Membership Dues listed in Form 1 at 353.f, all Regulatory Commission Expenses itemized at 351.h, and non-safety related advertising included in Account 930.1 . Line 5a - Regulatory Commission Expenses directly related to transmission service, ISO filings, or transmission siting itemized at 351.h.
J Includes only FICA, unemployment, highway, property, gross receipts, and other assessments charged in the current year. Taxes related to income are excluded. Gross receipts taxes are not included in transmission revenue requirement in the Rate Formula Template, since they are recovered elsewhere.
K The currently effective income tax rate, where FIT is the Federal income tax rate; SIT is the State income tax rate, and p = "the percentage of federal income tax deductible for state income taxes". If the utility is taxed in more than one state it must attach a work paper showing the name of each state and how the blended or composite SIT was developed. Furthermore, a utility that elected to utilize amortization of tax credits against taxable income, rather than book tax credits to Account No. 255 and reduce rate base, must reduce its income tax expense by the amount of the Amortized Investment Tax Credit (Form 1, 266.8.f) multiplied by (1/1-T) (page 3, line 26).

|  | Inputs Required: | FIT $=$ | $35.00 \%$ |
| :---: | :--- | :--- | :--- |
|  |  | SIT $=$ | $1.34 \%$ |
|  |  | (State Income Tax Rate or Composite SIT) |  |
|  |  | $0.00 \%$ | (percent of federal income tax deductible for state purposes) |
| L | Removes dollar amount of transmission expenses included in the OATT ancillary services rates, including Account Nos. |  |  |

L Removes dollar amount of transmission expenses included in the OATT ancillary services rates, including Account Nos. 561.1-561.3, and 561.BA.
M Removes transmission plant determined by Commission order to be state-jurisdictional according to the seven-factor test (until Form 1 balances are adjusted to reflect application of seven-factor test).
N Removes dollar amount of transmission plant included in the development of OATT ancillary services rates and generation step-up facilities, which are deemed included in OATT ancillary services. For these purposes, generation stepup facilities are those facilities at a generator substation on which there is no through-flow when the generator is shut down.

O Enter dollar amounts
P Debt cost rate $=$ long-term interest (line 21) / long term debt (line 27). Preferred cost rate $=$ preferred dividends (line 22) / preferred outstanding (line 28). ROE will be supported in the original filing and no change in ROE may be made absent a filing with FERC.
Q Line 33 must equal zero since all short-term power sales must be unbundled and the transmission component reflected in Account No. 456.1 and all other uses are to be included in the divisor
R Includes income related only to transmission facilities, such as pole attachments, rentals and special use.
Reserved
T The revenues credited on page 1, lines 2-4b shall include only the amounts received directly (in the case of grandfathered agreements) or from the ISO (for service under this tariff) reflecting the Transmission Owner's integrated transmission facilities. They do not include revenues associated with FERC annual charges, gross receipts taxes, ancillary services, or facilities not included in this template (e.g., direct assignment facilities and GSUs) which are not recovered under this Rate Formula Template. The revenues on lines 5 a -5d are supported by separate references for each item.
U Gross plant and depreciation reserve balances for facilities below 138 kV are reported in a footnote to the FERC Form 1 pages.
V On Line 35, enter revenues from RTO settlements that are associated with NITS and firm Point-to-Point Service for which the load is not included in the divisor to derive ATSI's zonal rates. Exclude non-firm Point-to-Point revenues, and revenues related to MTEP and RTEP projects. Include revenues and revenue adjustments associated with Docket EL02-111, and revenue credit adjustments related to ATSI's PJM integration as supported by Appendix G.

W Account Nos. 561.4, 561.8, and 575.7 consist of RTO expenses billed to load-serving entities and are not included in Transmission Owner revenue requirements.
X Reserved
$\begin{array}{ll}\mathrm{X} & \text { Reserved } \\ \text { Y } & \text { Reserved }\end{array}$
Y Reserved

## Schedule 1A Rate Calculation

| 1 | $\$$ | $1,650,325$ | Attachment H-21A, Page 4, Line 7 |
| :--- | :--- | ---: | :--- |
| 2 | $\$$ | 89,827 |  |
| 3 | $\$ 1,560,498$ | Revenue Credits for Sched 1A - Note A |  |
|  |  |  |  |
| 4 | $68,386,245$ | Annual MWh in ATSI Zone - Note B |  |
| 5 | $\$$ | 0.0228 | Schedule 1A rate \$/MWh (Line 3/ Line 4) |

Note:
A Revenues received pursuant to PJM Schedule 1A revenue allocation procedures for transmission service outside of ATSI's zone during the year used to calculate rates under Attachment H-21A.

B Load expressed in MWh consistent with load used for billing under Schedule 1A for the ATSI zone. Data from RTO settlement systems for the calendar year prior to the rate year.

# Attachment H-21A, Appendix B, Page 1 of 3 <br> Dual Voltage Billing Factors Calculation Example <br> (Current Dual Voltage Billing factors and Rates are posted on PJM.com on the MSWG page) 

## Assumptions:

Total Annual Peak Load for ATSI Zone $=12,000$ MW, with the breakdown of the peak within each state approved service territory below:
CEI: 4,100 MW
OE: 5,000 MW
PP: 900 MW
TE: 2,000 MW
Based on engineering studies, the percentage of ATSI's total annual peak load deemed to be utilizing transmission facilities below 138 kV is $34 \%$, with $0 \%$ in CEI's territory, $22 \%$ in OE's territory, $5 \%$ in PennPower's territory, and $7 \%$ in TE's territory.
Two municipal/rural customers have loads metered at each interconnection point.
Customers A and B's peak loads for each of the 3 service territories having transmission facilities below 138 kV facilities are provided below:
Customer A
Total Metered Load
Metered load at locations served below 138 kV
Customer B
Total Metered Load
Metered load at locations served below 138 kV
OE
TE
PP

50
40
25
25
10
10

138 kV and above $\quad \$$
1,000 /MW-month
1,200 /MW-month

## Attachment H-21A, Appendix B, Page 2 of 3

Dual Voltage Billing Factors Calculation Example
(Current Dual Voltage Billing factors and Rates are posted on PJM.com)

|  | (1) | (2) | $(3)=(2) /(1)$ |
| :---: | :---: | :---: | :---: |
|  | NPLS- Network <br> Peak Load (MW) | NPLS-Network Peak Load Utilizing Below 138 kV Facilities | Billing Factor for Below 138 kV \% Load |
| Total For ATSI Zone | 12,000 | 4,080 | 34.00\% |
| Cleveland Electric Illuminating (CEI) |  |  |  |
| CEI Total | 4,100 | 0 | 0.00\% |
| CEI Wholesale, Retail, POLR Load Suppliers | 4,100 | 0 | 0.00\% |
| Ohio Edison (OE) |  |  |  |
| OE Total | 5,000 | 2,640 | 52.80\% |
| Specifically Metered Wholesale Load |  |  |  |
| Customer A | 50 | 40 | 80.00\% |
| Customer B | 20 | 15 | 75.00\% |
|  | 70 | 55 |  |
| OE Retail, POLR Load Suppliers | 4,930 | 2,585 | 52.43\% |
| Toledo Edison (TE) |  |  |  |
| TE Total | 2,000 | 840 | 42.00\% |
| Specifically Metered Wholesale Load |  |  |  |
| Customer A | 25 | 25 | 100.00\% |
| Customer B | 10 | 10 | 100.00\% |
|  | 35 | 35 |  |
| TE Retail, POLR Load Suppliers | 1,965 | 805 | 40.97\% |
| Pennsylvania Power (PP) |  |  |  |
| PP Total | 900 | 600 | 66.67\% |
| Specifically Metered Wholesale Load |  |  |  |
| Customer A | 10 | 10 | 100.00\% |
| Customer B | - | - | N/A |
|  | 10 | 10 |  |
| PP Retail, POLR Load Suppliers | 890 | 590 | 66.29\% |

# Attachment H-21A, Appendix B, Page 3 of 3 <br> Dual Voltage Billing Factors Calculation Example (Current Dual Voltage Billing factors and Rates are posted on PJM.com) 

## Calculation of Monthly Transmission Bill Based Using the Dual Voltage Rates

Example: For a Transmission Customer serving 100 MW of retail load in Ohio Edison (OE) territory:

1) Multiply the Customer's Daily Average NPLS by the ' 138 kV and Above Rate' to get the 138 kV and above portion of the bill.
$100 \mathrm{MW} \times \$ 1,000.00=\$ 100,000$
2) Multiply the Daily Average NPLS by the Billing Factor for OE Retail Load, then multiply the resultant product by the 'Below 138 kV Rate'

100 MW x 52\% = 52 MW
52 MW x \$1,200=\$62,400
3) Add the results of step 1 and 2 to get the total NITS charges
$\$ 100,000+\$ 62,400=\$ 162,400$

## Reserved

| Line <br> No. |  | Reference | Transmission |
| :--- | :--- | :--- | :--- | :--- | Allocator

Transmission Enhancement Credit
To be completed in conjunction with Attachment $\mathrm{H}-21 \mathrm{~A}$


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

## Legacy MTEP Credit Calculation

To be completed in conjunction with Attachment $\mathrm{H}-21 \mathrm{~A}$

## (1)

1 Gross Transmission Plant - Total
2 Net Transmission Plant - Total O\&M EXPENSE
Total O\&M Allocated to Transmission
4 Annual Allocation Factor for O\&M
TAXES OTHER THAN INCOME TAXES
5 Total Other Taxes
6 Annual Allocation Factor for Other Taxes
7 Annual Allocation Factor for Expense INCOME TAXES
8
Total Income Taxes
9 Annual Allocation Factor for Income Taxes

## RETURN

10
Return on Rate Base
Annual Allocation Factor for Return on Rate Base
12 Annual Allocation Factor for Return
(2)
(3)

Transmission
\$ 1,989,708,176 \$ 1,035, 150, 274

Attach. H-21A, p. 3, line 8, col. 5
(line 3 divided by line $1, \mathrm{col} .3$ )

Attach. H-21A, p. 3, line 20, col. 5 (line 5 divided by line 1 , col. 3 )

## Sum of line 4 and 6

Attach. H-21A, p. 3, line 27, col. 5
(line 8 divided by line 2, col. 3 )

Attach. H-21A, p. 3, line 28, col. 5
(line 10 divided by line 2, col. 3)
Sum of line 9 and 11
(4)

Allocator 2.307516\%
1.944077\%
4.251593\%
$3.610022 \%$
8.655432\%

## Legacy MTEP Credit Calculation

To be completed in conjunction with Attachment H-21A


For the 12 months ended $12 / 31 / 2013$

## Reserved

## Revenue Credit Adjustment Calculation <br> To be completed in conjunction with Attachment H-21A

(1)

Line
No.

## REVENUE CREDIT TRUE-UP

1 Difference Between Revenues Received Under Midwest ISO
and PJM Protocols
ACCUMULATED REVENUE CREDIT BALANCE

ACCUMULATED REVENUE CREDIT BALANCE
Accumulated Balance
(Note B)
Deferred Income Tax Rate
(Note C)
Deferred Income Taxes (Line 2 * Line 3)
Regulatory Rate Base (Line 2 - Line 4)
(2)

Reference
(3)

Company Total

## INCOME TAXES

$\mathrm{CIT}=(\mathrm{T} / 1-\mathrm{T}) *(1-(\mathrm{WCLTD} / \mathrm{R}))$
Attachment H-21A, page 3, line 22
42.85\%

Income Taxes (Line 6 * Line 9)

| $\$$ | $(79,869)$ |
| :---: | ---: |
| $\$$ | $(1,031,355)$ |
|  | $35.867778 \%$ |
| $\$$ | $(369,924)$ |
| $\$$ | $(661,431)$ |

## RETURN

FERC Refund Rate (Note D) $\quad 3.25 \%$

Return (Line 5 * Line 8)
$\xlongequal{\$ \quad(21,497)}$

Revenue Credit Adjustment (Lines $1+7+9$ )
\$
(110,578)

Note
Letter
A Revenue Credit Adjustment Worksheet, Column 4 for calendar year prior to rate year.

B Accumulated balance as of December 31 of the calendar year prior to the rate year (Column 7 of Revenue Credit Adjustment Worksheet).
C Effective deferred tax rate as of December 31 of the calendar year prior to the rate year.
D The applied FERC Refund Rate is the rate approved as of December 31 of the calendar year prior to the rate year, as described under section 35.19a(a)(2) of the Commission's Regulations, 18 C.F.R. § 35.19a(a)(2) (2005).

## Revenue Credit Adjustment Worksheet



## Attachment B

Workpapers

## other electric revenue

| Line | Description |  | Amount | Reference | Input |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 1 | MISO 2013 Point-to-Point Transmission Revenues | \$ | - | 2013 Q4 FERC Form 1, 330.x.n |  |
| 2 | PJM 2013 Point-to-Point Transmission Revenues | \$ | 2,982,478 | 2013 Q4 FERC Form 1, 330.4.n |  |
| 3 | Appendix G Revenue Credit Adjustment | \$ | $(110,578)$ | 2013 Year End Formula Rate Filing, Attachment H-21A, Appendix G, Line 10 |  |
| 4 | Total Other Electric Revenues | \$ | 2,871,900 | (Line $1+$ Line $2+$ Line 3) | Attachment H-21A, Page 4, Line 35 |

## APPENDIX G: REVENUE CREDIT ADJUSTMENT WORKPAPER

| Line | Description |  | Amount | Reference | Source |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 1 | Point-To-Point Revenues Reported | \$ | 11,884,189 | Form 1 - Page 330, Line 5, Col n | FERC Form 1, 2010 |
| 1a | LTF Point-To-Point Revenues Related to Load in Divisor | \$ | 4,299,654 | Footnote | FERC Form 1, 2010 |
| 1 b | Non-Firm Point-to-Point Revenues | \$ | 1,041,268 | Footnote | FERC Form 1, 2010 |
| 2 | Total Reported on Line 35, Attachment H-21A Page 4 | \$ | 6,543,267 | (Line 1 - Line 1a - Line 1b) |  |
| 3 | Revenue and Revenue Adjustments Associated with Docket EL02-111 | \$ | $(1,475,695)$ |  | Company Records |
|  | Total adjusted for Docket EL02-111 Revenue and |  |  |  |  |
| 4 | Revenue Adjustments | \$ | 8,018,962 | (Line 2 - Line 3) |  |
| 5 | Monthly Total reported in Column 3, June-December 2011, Appendix G - Revenue Credit Adjustment Worksheet | \$ | 668,247 | (Line 4 / 12) |  |

## INPUT CALCULATIONS for APPENDIX G

| Line | Description |  | Amount | Reference | Input |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 1 Monthly Revenue From MISO: Jan - May 2011 |  |  |  |  |  |
| 2 | MISO 2011 Point-to-Point Transmission Revenues | \$ | 3,496,306 | 2011 FERC Form 1, 330.5.n |  |
| 3 | MISO 2011 Point-to-Point Revenue Associated with Non-Firm Point-to-Point Service | \$ | 258,448 | 2011 FERC Form 1, Footnote for 328.5.m |  |
| 4 | MISO 2011 Point-to-Point Revenue Associated with Load Included in the Divisor | \$ | 1,736,650 | 2011 FERC Form 1, Footnote for 328.5.m |  |
| 5 | Total MISO 2011 Firm Point-to-Point Transmission Revenues | \$ | 1,501,208 | (Line 1-Line 2 - Line 3) |  |
| 6 | Average Monthly Revenue Received From MISO for Jan - May 2011 | \$ | 300,242 | (Line 5) / 5 | Appendix G Worksheet, Column (2) |
| 7 |  |  |  |  |  |
| 8 | Monthly Revenue From PJM: Jan - May 2012 |  |  |  |  |
| 9 | PJM Point-to-Point Transmission Revenues for Jan May 2012 | \$ | 1,239,504 | Company Records |  |
| 10 | Average Monthly Revenue Received From PJM for Jan - May 2012 | \$ | 247,901 | (Line 9) / 5 | Appendix G Worksheet, Column (2) |
| 11 |  |  |  |  |  |
| 12 Monthly Revenue Included in Rates for Jun 2012 - May 2013 Exclud |  |  |  |  |  |
| 13 | Sum RTO Firm Point-to-Point Transmission Revenues for 2011 | \$ | 3,166,495 | Revenue Credit Adj WS, Column (2) |  |
| 14 | Average Monthly Rev. Included in Rates for Jun 2012 - May 2013 Excl. True-up | \$ | 263,875 | (Line 13) / 12 | Appendix G Worksheet, Column (3) |
| 15 |  |  |  |  |  |
| 16 True-up Adjustment Included in ATSI's Net Revenue Requirement for Jun 2013 - May 2014 |  |  |  |  |  |
| 17 | Difference Between Rev Rec'd and Amt in Rates Excl True-up for Jan - Dec 2012 | \$ | 2,283,567 | Att. G Worksheet, Col (4), Sum (Jan - Dec 2012) |  |
| 18 | Monthly True-up Adjustment for Jun 2013 - May 2014 | \$ | 190,297 | (Line 17) / 12 | Appendix G Worksheet, Column (5) |
| 19 |  |  |  |  |  |
| 20 | True-up Adjustment Included in ATSI's Net Revenue Requirement for Jun 2014 - May 2015 |  |  |  |  |
| 21 | Difference Between Rev Rec'd and Amt in Rates Excl True-up for Jan - May 2013 |  | 79,869 | Att. G Worksheet, Col (4), Sum (Jan - May 2013). |  |
| 22 | Monthly True-up Adjustment for Jun 2014 - May 2015 |  | 6,656 | (Line 21) / 12 | Appendix G Worksheet, Column (5) |

ACCUMULATED DEFERRED INVESTMENT TAX CREDITS (ACCOUNT 255)

Based on prior elections and IRS rulings, the 3\% Investment Tax Credit ("ITC") and the 4\% ITC may be used to reduce rate base as well as utilizing amortization of the tax credits against taxable income.

As a result, for the rate year beginning in June 2014, the amount included on Attachment $\mathrm{H}-21$ A, page 2 of 5 , at line 23 is equal to $\$ 17,059$. This value can be found on FERC Form 1 , page 267 , at line 3 and column h .


| Description | Effective Rate | Statutory Rate | Calc Eff Rate | Calc Stat Rate | Entity Apport | Default Rows |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Federal | 0.34532735 | 0.35 | 0.00 | 0.00 | 1.00000000 | Calc Rates |
| Ohio | 0.00 | 0.00 | 0.00 | 0.00 | 0.00000000 | Update Rates |
| Pennslyvania | 0.00 | 0.0999 | 0.00 | 0.00 | 0.00000000 |  |
| West Virginia | 0.00002275 | 0.07 | 0.00 | 0.00 | 0.00032500 |  |
| Ohio OE Local | 0.00 | 0.01865202 | 0.00 | 0.00 | 0.00000000 |  |
| Ohio ATSI Local | 0.01332768 | 0.01692701 | 0.00 | 0.00 | 0.78736146 |  |
| Totals | 0.35867778 |  | 0.00 |  |  |  |

## FAS 109 DEFERRED INCOME TAXES DEPRECIATION ADJUSTMENT

| Line <br> 1 | Account 282: Electric Accumulated Deferred Income Taxes - Other Property <br> 1a |
| :---: | :--- |
| Federal Liberal Depreciation OPER Adjustment |  |
| 1b | State Liberal Depreciation OPER Adjustment |
| 2 | Total Included on Line 20, Attachment H -21A, Page 2 |


|  | Amount |  |
| :--- | ---: | :--- |
|  | Reference |  |
| $\$$ | $(251,639,454)$ | FERC Form 1, Page 275, Row 2, Column k |
| $\$$ | $3,482,979$ | GL Account 282170 |
| $\$$ | 89,027 | GL Account 282175 |
| $\$$ | $(248,067,448)$ | Attachment H-21A, Page 2, Line 20, Column 3 |


| $\$$ | $(20,726,813)$ | FERC Form 1, Page 277, Row 9, Column k |
| :--- | ---: | :--- |
| $\$$ | $1,923,388$ | GL Account 283170 |
| $\$$ | 48,367 | GL Account 283175 |
|  | $(18,755,058)$ | Attachment H-21A, Page 2, Line 21, Column 3 |

2013 FILED ATSI FORMULA RATE TAXES OTHER THAN INCOME TAXES RECONCILIATION

| Taxes Reported in 2013 Filing |  | Taxes That Should Have Been Reported in 2013 Filing |  | True-up Adjustment Over (Under) Recovery |
| :---: | :---: | :---: | :---: | :---: |
| FERC Form 1 |  | FERC Form 1 |  |  |
| 263.37.i | 33,000,000 | 263.36.i | $(52,985)$ |  |
| 263(.1).20.i | 11,244 | 263.37.i | 33,000,000 |  |
| 263.33.i | 1,252 | 263(.1).19.i | $(3,577)$ |  |
|  |  | 263(.1).20.i | 11,244 |  |
|  |  | 263.32.i | (432) |  |
|  |  | 263.33.i | 1,252 |  |
|  | 33,012,496 |  | 32,954,250 | 58,246 |


(1) Calculation of Interest

| Month of June 2013 | 1 | - | 4,854 |  | 0.0027 | 7 | 4,860 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| July 2013 through Sept 2013 | 3 | 4,860 | 14,562 |  | 0.0028 | 102 | 19,524 |
| Oct 2013 through Dec 2013 | 3 | 19,524 | 14,562 |  | 0.0028 | 225 | 34,311 |
| Jan 2014 through Mar 2014 | 3 | 34,311 | 14,562 |  | 0.0027 | 337 | 49,209 |
| Apr 2014 through May 2014 | 2 | 49,209 | 9,708 |  | 0.0027 | 292 | 59,209 |
| REVERSES |  |  |  |  |  |  |  |
| Month of June 2014 | 1 | 59,209 |  | $(5,016)$ | 0.0027 | 153 | 54,346 |
| July 2014 through Sept 2014 | 3 | 54,346 |  | $(15,048)$ | 0.0028 | 393 | 39,691 |
| Oct 2014 through Dec 2014 | 3 | 39,691 |  | $(15,048)$ | 0.0028 | 270 | 24,913 |
| Jan 2015 through Mar 2015 | 3 | 24,913 |  | $(15,048)$ | 0.0027 | 141 | 10,005 |
| Apr 2015 through May 2015 | 2 | 10,005 |  | $(10,032)$ | 0.0027 | 27 | 0 |


| Total Interest | 1,947 |
| :--- | ---: |
| Over Recovery | 58,246 |

(2) Total Reconciliation (subtracted from Property Tax in Att. H-21A, page 3 of 5, line 16)

| 58,246 |
| ---: |
| 60,193 |

(1) Adjustment calculations performed per Section 4, Part b of the Formula Rate Implementation Protocols, found in Attachment A of the Settlement Agreement and Offer of Settlement submitted July 27, 2011, and approved April 18, 2014, under Docket Nos. ER11-2814 and ER11-2815.
(2) To limit the number of adjustments in Attachment H-21A, the 2011 Ohio CAT Tax (FERC Form 1 page 263.32.i) reconciliation is included in the Property Tax line as opposed to the "Other" line in Attachment H-21A, page 3 of 5, line 18. Property Tax and Other are both summed and allocated in Attachment H-21A in the same manner.


2013 FILED ATSI FORMULA RATE GENERAL ADVERTISING RECONCILIATION

| Over Recovery |  |  | Expense to be Trued-Up | Credit for TrueUp | Interest Rate | Calculated Interest Quarterly |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| As calculated on Workpaper \#8 Page 1 of 2 | 0 |  |  |  |  |  |  |
|  | No. of Months | Beginning Balance |  |  |  |  | Ending Balance |
| Calculation of Interest |  |  |  |  |  |  |  |
| Month of June 2013 | 1 | - | 73 |  | 0.2700\% | 0 | 74 |
| July 2013 through Sept 2013 | 3 | 74 | 220 |  | 0.2800\% | 2 | 296 |
| Oct 2013 through Dec 2013 | 3 | 296 | 220 |  | 0.2800\% | 3 | 519 |
| Jan 2014 through Mar 2014 | 3 | 519 | 220 |  | 0.2700\% | 4 | 743 |
| Apr 2014 through May 2014 | 2 | 743 | 147 |  | 0.2700\% | 3 | 892 |
| REVERSES |  |  |  |  |  |  |  |
| Month of June 2014 | 1 | 892 |  | (75) | 0.2700\% | 1 | 819 |
| July 2014 through Sept 2014 | 3 | 819 |  | (224) | 0.2800\% | 2 | 596 |
| Oct 2014 through Dec 2014 | 3 | 596 |  | (224) | 0.2800\% | 1 | 373 |
| Jan 2015 through Mar 2015 | 3 | 373 |  | (224) | 0.2700\% | (0) | 150 |
| Apr 2015 through May 2015 | 2 | 150 |  | (149) | 0.2700\% | (0) | 0 |
| Total Interest |  |  |  |  |  | 15 |  |
| Over Recovery |  |  |  |  |  | 880 |  |
| Total Reconciliation (subtracted from line 5a on page 3 of 5 in Att. H-21A) |  |  |  |  |  | 895 |  |

(1) Adjustment calculations performed per Section 4, Part b of the Formula Rate Implementation Protocols, found in Attachment A of the Settlement Agreement and Offer of Settlement submitted July 27, 2011, and approved April 18, 2014, under Docket Nos. ER11-2814 and ER11-2815.

GENERAL \& INTANGIBLE ACCUMULATED DEPRECIATION
Attachment H -21A page 2 of 5

Per Formula Rate
General
Intangible
Total
Column (2)
FF1 page 219.28.c 14,460,975
FF1 page 200.21.c $\quad 8,161,234$

Taking into Account Footnote for FERC Form 1 page 219

| General | FF1 page 219.28.C | $6,299,741$ |
| :--- | :--- | :--- |
| Intangible | FF1 page 200.21.c | $8,161,234$ |

Total to be entered in Att. $\mathrm{H}-21 \mathrm{~A}$ on page 2 of 5 , line 10, column (3)
14,460,975

STATED-VALUE INPUTS TO THE FORMULA RATE
Formula Rate Protocols
Appendix C, Section g, Item i

1. Rate of Return on Common Equity ("ROE")

Per June 3, 2005 Remand Order (Docket No. ER02-485-004), ATSI ROE set to 12.38 percent.

## 2. Postretirement Benefits Other Than Pension ("PBOP")

*sometimes referred to as Other Post Employment Benefits, or "OPEB"
PBOP included in FERC Acct. No. 926, as reported in FERC Form 1 page 323.187.b, is included in the Administrative \& General Expenses input to Attachment H-21A, page 3 of 5 line 3. The total PBOP amount in FERC Acct. No. 926 is ( $\$ 336,866$ ), per company records.
PBOP included in FERC Acct. No. 283, as reported in FERC Form 1 page 277.9.k, is included in the Adjustments to Rate Base section of Attachment $\mathrm{H}-21 \mathrm{~A}$ on page 2 of 5 , line 21. The total PBOP amount in FERC Acct. No. 283 is $\$ 192,802$, per the footnote for FERC Form 1 page 276.3.k.
3. Depreciation Rates

| FERC Account | Depr \% |
| :---: | ---: |
| 352 | $2.24 \%$ |
| 353 | $2.06 \%$ |
| 354 | $2.24 \%$ |
| 355 | $3.09 \%$ |
| 356 | $2.69 \%$ |
| 357 | $2.00 \%$ |
| 358 | $2.04 \%$ |
| 359 | $1.33 \%$ |

ASSET RETIREMENT OBLIGATION ADJUSTMENTS

| Description | Source | Amount |  |
| :--- | :--- | :--- | :--- |
| Asset Retirement Cost for Transmission Plant | FERC Form 1 page 207.57.g | 1,161,643 |  |
| Subtracted from page 2 of 5, Line 2, Column (3) |  |  |  |
| Reserve for Depreciation of Asset Retirement Costs | Company Records | 110,819 | Subtracted from page 2 of 5, Line 8, Column (3) |

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C., this 1st day of May, 2014.
/s/Richard P. Sparling
Richard P. Sparling
Alston \& Bird LLP


[^0]:    3 ATSI Protocols, Note 1. The formula rate inputs for (i) rate of return on common equity; (ii) "Post- Employment Benefits Other Than Pension" pursuant to Statement of Financial Accounting Standards No. 106, Employers' Accounting for Postretirement Benefits Other Than Pensions ("PBOP") charges; and (iii) depreciation and/or amortization rates are stated values. Pursuant to section $1 . g$ (i) of the ATSI Protocols, ATSI has specified these stated-value inputs in Workpaper 10 included with this Annual Update. Further, Attachment H-21A, Page 1, Line 8 lists a value of 13,141.1 MW. As described in Note A of Attachment H-21A, that value was provided by PJM.

