

**AMP Transmission, LLC**  
**Pre-Qualification Filing**

Feb 12, 2021

In accordance with Schedule 6, section 1.5.8, of the PJM Operating Agreement and Manual 14F, AMP Transmission, LLC (“AMPT”) submits the following information to the Office of the Interconnection for the purpose of pre-qualifying as a Designated Entity.

**1. Name and address of the entity including a point of contact.**

AMP Transmission, LLC  
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Columbus, Ohio 43229

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Vice President Transmission Planning  
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**2. Technical and engineering qualifications of the entity or its affiliate, partner, or partner company.**

AMP Transmission LLC (“AMPT”) is a wholly owned and consolidated subsidiary of American Municipal Power, Inc. (“AMP”), an Ohio not-for-profit that owns and provides transmission services in Delaware, Indiana, Kentucky, Maryland, Michigan, Ohio, Pennsylvania, Virginia and West Virginia for the Members. AMP currently employs two licensed professional engineers on its staff that oversee the development, engineering and construction of AMPT transmission facilities. AMP is in the process of hiring additional positions as well. Key AMPT activities include the development of project specifications for electrical equipment, design of transmission facilities, evaluations of proposals for engineering and construction services, and project oversight of construction activities. AMP and its 135-affiliate members have a multitude of various industry expertise including the development, operation and maintenance of generation, transmission and distribution facilities.

For the development of capital projects, AMPT procures necessary services for technical and engineering activities in order to address PJM Transmission Owner or Designated Entity obligations. Partners that provide services to AMPT are thoroughly vetted and provide the same types of services for other PJM transmission owners.

In addition to AMP’s subject matter experts and contractual partners, GridForce Energy Management and Utility Services, Inc. provide NERC compliance functions and services to AMPT. Additionally, AMP members perform operation and maintenance on AMPT facilities pursuant to standard operation and maintenance contracts. These service agreements provide AMPT access to highly qualified personnel with extensive background in day-to-day operation of the assets that AMPT owns.

**3. Demonstrated experience of the entity or its affiliate, partner, or parent company to develop, construct, maintain, and operate transmission facilities including a list or other evidence of transmission facilities previously developed**

**regarding construction, maintenance, or operation of transmission facilities both inside and outside of the PJM Region.**

AMP owns in whole or part approximately 40 miles of transmission voltage, non-networked, generation lead lines that connect AMP’s generating facilities with integrated transmission system in both PJM and MISO:

<b>Generator</b>	<b>Description of Associated Transmission</b>
Meldahl Hydroelectric Facility	3-mile, 138 kV generator interconnection line
Belleville Hydroelectric Facility	26.5-mile, 138 kV generator interconnection line
Prairie State Energy Campus (23.26% ownership interest)	Two roughly 600-foot 345 kV lines, two generator step-up transformers, and a substation
Fremont Energy Center (93.84% ownership interest)	900 feet of 138 kV generator interconnection lines (comprising three interconnection lines, one for each turbine on site, each individually less than 300 feet long)
Cannelton Hydroelectric Facility	1,000-foot, 138 kV generator interconnection line and a 138 kV three breaker ring bus
Smithland Hydroelectric Facility	2.3-mile, 161 kV generator interconnection line
Willow Island Hydroelectric Facility	1.6-mile, 138 kV generator interconnection line
Greenup Hydroelectric Facility (48.6% ownership interest)	14.51 miles of 138 kV generator interconnection line

AMPT currently owns a limited and discrete set of transmission assets acquired from municipal utility members of AMP. The location and specifics of those facilities are as follows:

<b>Facility Location</b>	<b>Description of Transmission Facilities</b>
Napoleon, Ohio	138 kV four-breaker ring bus and two short station entrance span looping in and out of the substation, each less than 50 feet
Amherst, Ohio	1.84-mile, 69 kV transmission line and two substations, associated station bus work and one 69kV circuit breaker
Wadsworth, Ohio	Four 138 kV circuit breakers; fourteen 1200A switches; two 138 kV line entrance guard gaps; six 138 kV capacitor coupled voltage transformers (CCVTs); forty-eight current transformers mounted on 138kV circuit breakers; twelve current transformers only mounted on 69 kV circuit breakers; six current transformers only

	mounted on power transformers; 138kV steel structures; 138kV insulators; associated 138kV conductor, bus work, grounding, grounding platforms, fittings and connectors
Deshler, Ohio	Approximately 10.7 miles of 69 kV transmission lines and two substations
Brewster, Ohio	Approximately 3.5 miles of 69 kV transmission lines and two substations
Huron, Ohio	69kV facility and associated equipment at the substation, including three circuit breakers, six disconnect switches, three Surge Arrestors, various structures, ground grid and fencing, and associated hardware

AMPT is currently developing two baseline transmission projects in the ATSI zone, totaling to \$12M in projected investments by 2023. Projects include the construction of two new 138/69kV step down substations and approximately 0.5 miles of new 138kV transmission line. AMPT is also developing a proposal to construct a new 5.5 mile 69kV line along with a new 3-4 breaker 69kV ring station at an estimated cost of \$17.7M.

**4. Previous record of the entity or its affiliate, partner, or parent company to adhere to standardized construction, maintenance and operating practices.**

AMP, AMPT and AMP’s members have owned and operated transmission facilities for many decades. Since AMPT’s establishment in 2018, AMPT has begun to standardize its construction, maintenance and operating practices, including the development of its transmission interconnection requirements, transmission construction design standards, and standardized operation and maintenance procedures. AMPT’s affiliate AMP has extensive history of constructing, maintain and operating utility scale electrical facilities, pursuant to and in compliance with PJM’s and MISO’s interconnection and construction service agreements. Most notable of these are the AMP hydropower generation facilities, which required over ten years of regulatory, siting and construction activities to bring the \$1B of investments online. Since bringing these facilities online, AMP and AMPT have continued to operate the facilities in compliance with all FERC, NESC, PJM and NERC requirements.

**5. Capability of the entity or its affiliate, partner, or parent company to adhere to standardized construction, maintenance and operating practices.**

AMPT through its affiliate AMP, maintains an internal staff of engineering and maintenance personnel that are responsible for the oversight of construction and maintenance activities on AMPT’s transmission facilities. AMP’s personnel are responsible for successfully overseeing all engineering activities associated with AMPT’s capital and maintenance projects. These projects have and will vary in scope from routine equipment replacements due to failures, to the addition of new transmission facilities pursuant to AMPT’s and PJM’s planning requirements. In addition to AMPT’s internal resources, AMPT also contracts additional planning, engineering, construction, operation

and compliance support. Additionally, AMPT is currently in the process of developing its engineering standards.

**6. Financial statements of the entity or its affiliate, partner, or parent company. Please provide the most recent fiscal quarter, as well as the most recent three fiscal years, or the period of existence of the entity, if shorter, or other evidence demonstrating an entity's current and expected financial capability acceptable to the Office of the Interconnection.**

The audited 2019 AMP consolidated financial statements that include 2018 and the AMP Q3 2020 unaudited financial statements are attached hereto. AMPT's financial results are consolidated with AMP's for reporting purposes. In addition to AMPT, the consolidated financial statements include the accounts of AMP's wholly owned subsidiaries, AMPO, Inc., Meldahl LLC, and AMP 368. All intercompany transactions have been eliminated in the preparation of the consolidated financial statements.

**7. Commitment by the entity to execute the Consolidated Transmission Owners Agreement, if the entity becomes a Designated Entity.**

AMPT executed the Consolidated Transmission Owners Agreement in October 2018.

**8. Evidence demonstrating the ability of the entity to address and timely remedy failure of facilities.**

AMPT has entered into operation and maintenance agreements with municipal members local to each asset owned by AMPT. Consequently, AMPT has the ability to respond to and remedy facility failures expeditiously. For example, the facilities in Brewster, Ohio were struck by trees falling from outside of the right of way, resulting in an outage. AMPT was able to remedy the outage by repairing all damaged facilities and place the repaired facilities back into normal operation within hours of the event occurrence as a result of the operation and maintenance agreement in place with AMP's local municipal members.

In addition to local onsite personnel, AMPT is currently working to identify and develop lists of spare equipment and parts and maintains spare inventory of replacement equipment to address failures that may occur during normal course of business. Finally, AMPT is developing master trade agreements with capable service providers to assist in the event of an emergency that cannot be handled by AMPT and AMP members alone.

**9. Description of the experience of the entity in acquiring rights of way.**

AMP and AMPT have acquired over 50 miles of transmission right of way to date (see references above). AMPT is also working with AMP member communities and contractual partners with additional local experience in right of way acquisition for the projects that are in process.

**10. Any other supporting information the PJM requires to determine the entity's prequalification status.**

AMPT entered into an Amended and Restated Loan Agreement (the "Loan Agreement") with AMP, the sole member of AMPT, which became effective on September 1, 2020. Pursuant to the terms of the Loan Agreement, AMP will loan AMPT up to \$50,000,000, in tranches as needed, for any of the following purposes: (i) acquiring transmission assets from AMP members pursuant to an Asset Purchase and Sales Agreement between AMPT and such member; (ii) construction of new facilities; and (iii) working capital for the costs of operating and maintaining transmission facilities and providing technical services. The Loan Agreement is evidenced by a promissory note executed by AMPT and delivered to AMP concurrently with the execution of the Loan Agreement and is repayable by AMPT solely from revenues received from AMPT's Commission-accepted formula rate. While the Loan Agreement is outstanding AMP has a security interest in the transmission assets purchased or constructed by AMPT. The interest rate charged by AMP on any outstanding amounts borrowed under the Loan Agreement is the higher of the prime rate as published by the Wall Street Journal or AMP's cost of borrowing as reflected in the interest rate borne by AMP's revolving credit agreement, which adjusts monthly.