

**AMERICAN TRANSMISSION SYSTEMS, INCORPORATED
A FIRSTENERGY COMPANY**

LETTER OF NOTIFICATION

**SAMMIS-STAR 345 kV TRANSMISSION LINE
REBUILD PROJECT
(SAMMIS SUBSTATION TO STRUCTURE 39 SEGMENT)**

OPSB CASE No. 26-0832-EL-BLN

October 19, 2026

**American Transmission Systems, Incorporated
341 White Pond Drive
Akron, Ohio 44320**

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The following information is being provided in accordance with Chapter 4906-6 of the Ohio Administrative Code (“Adm.Code”) for the application and review of Accelerated Certificate Applications. Based upon the requirements found in Appendix A to Adm.Code 4906-1-01, this Project qualifies for submittal to the Ohio Power Siting Board (“OPSB”) as a Letter of Notification application.

4906-6-05(B): LETTER OF NOTIFICATION REQUIREMENTS

4906-6-05(B) (1): Name and Reference Number

Name of Project: Sammis-Star 345 kV Transmission Lines Rebuild Project
(Sammis Substation to Structure 39 Segment) (“Project”)

Reference Numbers: 1015 - Sammis-Star 345 Transmission Line

4906-6-05(B)(1): Brief Description of Project

In this Project, American Transmission Systems, Incorporated, (“ATSI”), a FirstEnergy company, is proposing to rebuild the approximate 8.3-mile long Sammis Substation to Structure 39 segment (“Project”) of the approximate 68.63-mile long Sammis-Star 345 kV Transmission Line.

The existing transmission line for this segment is currently supported by thirty-eight (38) lattice towers and one (1) 2-pole steel structure. The existing conductor is 954 kcmil 48/7 ACSR with 159 kcmil ACSR shield wire. In connection with this Project, the thirty-eight (38) existing lattice towers and existing conductor and shield wire will be removed. Thirty-nine (39) new single circuit tubular steel structures on drilled shaft foundations will be installed on the existing Sammis-Star 345 kV Transmission Line centerline. In addition, new 954 kcmil 54/7 ACSS/HS “Cardinal” conductor and SFSJ-J-14069 (OPGW) and 7#6

Alumoweld shield wires will be installed. The existing 2-pole steel structure (existing structure #41053) will remain and will be renumbered (proposed structure #8). The conductor between existing structure #41085 and proposed structure #39 (existing structure #41084) will be transferred until the next phase of the project.

The proposed project will also require the installation of one new structure on the Sammis-Wellsville 345 kV Transmission Line. Currently the Sammis-Wellsville and Sammis-Star 345 kV Transmission Lines share a common double circuit lattice structure (#40416) directly outside of the Sammis Substation. The Project will remove structure #40416 and replace it with one new single circuit tubular steel monopole deadend structure (#40416) on the Sammis-Wellsville 345 kV Transmission Line. This will separate the two existing transmission lines onto separate structures. The existing conductor and shield wire will be transferred.

The Project is in the Village of Stratton, Brush Creek and Saline Townships in Jefferson County, Ohio. The general location of the Project is shown in **Exhibit 1**, a partial copy of the United States Geologic Survey, Jefferson County, OH, Quad Map. **Exhibit 2** is a copy of ESRI aerial imagery of the Project area. The general layout of the Project is shown in **Exhibit 3**.

4906-6-05(B)(1): Letter of Notification Requirement

The Project meets the requirements for a Letter of Notification because the Project is within the types of projects defined by Items (2)(a) of the Application Requirement Matrix for Electric Power Transmission Lines, Appendix A of Adm. Code 4906-1-01. These items state:

(2) Adding new circuits on existing structures designed for multiple circuit use, replacing conductors on existing structures with larger or bundled conductors, adding structures to an existing line or replacing structures with a different type of structure, for a distance of:

(b) more than two miles.

The proposed Project is within the requirements of Item (2)(b) because it involves replacing existing structures with new structures of a different type on existing transmission lines for a distance of approximately 8.3-miles.

4906-6-05 (B)(2): Need for the Project

ATSI is proposing to rebuild all 68.63 miles of the Sammis-Star 345 kV Transmission Line due to deteriorating facility conditions such as condition and structural capacity, and the growing amount of maintenance required to maintain the transmission line. The primary benefit of the Project is to enhance system reliability through protection from unplanned outages, and to augment ATSI's operating flexibility as well as system resiliency by replacing deteriorating structures and by updating the existing conductor and shield wires.

The need for the proposed Project was presented at the April 2, 2024, Subregional Regional Transmission Expansion Plan ("SRRTEP") Committee – Western meeting. The solution for the proposed Project was presented at the July 08, 2025, Subregional RTEP Committee – Western meeting. PJM assigned the Upgrade ID number of s3717.1 to the Project. The PJM presentation slides are included as **Exhibit 4**.

The proposed Sammis Substation to Structure 39 segment circuit consists of 38 lattice towers, and 1 2-pole steel structure. All the existing lattice towers were installed in 1962 or before. All conductors and static wire were also installed in 1962. The proposed project includes replacing the lattice towers while reusing the 2-pole steel structure as it was installed in 2024. The proposed Sammis Substation to Structure 39 segment will replace 38 of the existing structures and approximately 8.3 miles of conductor and shield wire.

As part of a 2021 health assessment, a drone was used to inspect all structures. This inspection found that 100% of structures had worn hardware while 23% showed rusted insulators. This is a direct correlation to the priority repair history as there was a total of 180 priority repair conditions associated with static wire and conductor attachments as well

as insulators strings between 2013 and 2020 on the entire Sammis-Star 345 kV Transmission Line.

In addition, on the Sammis Substation to Structure 39 segment, 20 conductor splices were Ohmstik¹ tested as part of the 2021 health assessment. Of the 20 splices, 18 (90%) splices were considered deteriorated.. This test sample does not, however, represent the entire transmission line. Some splices were unable to be tested due to clearance concerns. Therefore, it is assumed that there are additional issues elsewhere along this line. For static wire and conductor health, there have been 2 priority repair conditions for broken static wire strands and 7 priority repair conditions for broken conductor strands since 2017 on the entire Sammis-Star 345 kV Transmission Line.

See Table 1 below for all priority repair conditions associated with the proposed Sammis Substation to Structure 39 Segment.

Table 1. Sammis-Star 345kV Priority Conditions

Affected Component	Problem Description	Number of Conditions
Static Wire Attachment	Worn, Overheated or Missing	38
Insulator String	Flashed, Broken, Deteriorated, Rusted, Corona Damage, Missing Corona Ring, or Close Clearance	9
Conductor Attachment	Loose, Slack, Corona Damage, or Worn	0
Tower	Broken, Bent, Bird Nest, or Foreign Object	4
Crossarm	Bird Nest	1
Conductor	Broken Strands or Foreign Object	0
Wood Pole	Rejected, Cracked, or Bird Nest	0
Static Wire	Broken Strands or Foreign Object	1
Brace	Broken or Rotten	1
Foundation	Eroded or Deteriorated	0
Static Bond	Broken	0
Guy Wire	Missing	0

¹ An Ohmstik test is a live-line micro-ohmmeter measurement performed to determine the micro-ohm resistance of electrical connections such as splices, connectors, terminals, jumpers, bus bars, and switches while the equipment is energized.

Pursuant to R.C. 4906.10(A)(4), the implementation of advanced transmission technologies was considered as part of this Project. “Advanced transmission technologies” is defined to mean “software or hardware technologies that increase the capacity, efficiency, reliability, or safety of an existing or new electric transmission system, including grid-enhancing technologies such as dynamic line rating, advanced power flow controllers, and topology optimization; advanced conductors; and other technologies designed to reduce transmission congestion, or increase the capacity, efficiency, reliability, or safety of an existing or new electric transmission system.” R.C. 4906.01(N).

Here, ACSS conductor and OPGW will be used in the proposed Project. ACSS provides higher operating temperature capabilities and lower sag characteristics. The high-temperature/low-sag (“HTLS”) conductor allows for higher ampacity to be run through the conductor and provides more flexibility to alleviate overloading and premature degradation. Another benefit of an HTLS conductor’s higher ampacity is the ability to add additional load to the line. OPGW enables remote power system monitoring, relay protection, and network communications through high-speed data transmission. It provides real-time data exchange for system protection schemes and SCADA, improving system reliability and operational flexibility. OPGW offers a reliable communication path with minimal maintenance. It enables critical power functions like remote monitoring, fault detection, and real-time data communication.

4906-6-05(B)(3): Location of the Project Relative to Existing or Proposed Lines

The location of the Project relative to existing or proposed transmission lines is shown in the ATSI Transmission Network Map, included as part of the confidential portion of the FirstEnergy Corp. 2026 Long-Term Forecast Report (“LTFR”). This map was submitted to the PUCO in Case No. 26-0504-EL-FOR under Rule 4901:5-5:04 (C)(2)(b) of the Ohio Administrative Code. The map is incorporated by reference only. This map shows ATSI’s 345 kV and 138 kV transmission lines and transmission substations. This Project is included on page 105 in the 2026 LTFR. The general location of the Project area is shown in **Exhibits 1 and 2**. The Project layout is shown in **Exhibit 3**.

4906-6-05(B)(4): Alternatives Considered

Due to the physical condition of the existing transmission line and nature of the Project, there was only one alternative considered; replacement of only the identified failed structures in lieu of a full rebuild.

Alternative 1:

The alternative solution considered was to rebuild the existing wood pole section of the Sammis-Star 345 kV Transmission Line while rehabbing the lattice towers. This would change the proposed Sammis Substation to Structure 39 segment into a rehab instead of a rebuild because all structures in this segment are lattice structures. This alternative required Transmission Line Engineering to do a full tower analysis of the entire 345 kV Transmission Line. Upon completion of the engineering analysis, the remaining rehab portions of the original project were upgraded to a full rebuild based on the results. Of the lattice towers included in the proposed project, 27 towers (71%) were found to be structurally inadequate and requiring reinforcement to support the existing static wire and conductor loading. This means 71% of the towers would require significant upgrades or replacements to meet the current load requirements. Factoring in the need to access and modify 71% of this segments towers as well as the existing tower age (62 years old), it was decided that best practice would be to rebuild this transmission line using steel poles.

4906-6-05(B)(5): Public Information Program

Applicant's manager of External Affairs will advise local officials of features and the status of the proposed Project as necessary. Applicant will maintain a copy of this Letter of Notification, along with other Project information, on FirstEnergy's website:

https://www.firstenergycorp.com/about/transmission_projects/ohio.html.

Applicant will publish notice of the Project in the Herald-Star 7 days of filing this Letter of Notification application. The notice will comply with Adm. Code 4906-6-08(A)(1)-(6).

During all phases of this Project, Applicants will maintain the transmission projects hotline at 1-888-311-4737 or via email at: transmissionprojects@firstenergycorp.com where the public may ask questions or leave comments on the Project for Applicants.

4906-6-05(B)(6): Construction Schedule

Construction on the Project is expected to begin as early as January 4, 2027, and be completed/in-service by December 27, 2027. In light of the proposed construction start date, ATSI seeks 60-day expedited review of this Application.

4906-6-05(B)(7): Area Map

Exhibit 1 depicts the general location of the Project. This Exhibit provides a partial copy of the United States Geologic Survey, Jefferson County OH, Quad Map. **Exhibit 2** is a copy of ESRI aerial imagery of the Project area.

4906-6-05(B)(8): Properties List

The Project is located on existing right-of-way. New temporary access rights may be required as part of the Project. **Exhibit 5** contains a list of properties affected by the Project.

4906-6-05(B)(9): TECHNICAL FEATURES OF THE PROJECT

4906-6-05(B)(9)(a): Operating Characteristics

The transmission line construction will have the following characteristics:

Voltage: 345 kV

Conductors: 954 kcmil 54/7 ACSS/HS “Cardinal”

Static Wire: SFSJ-J-14069 (OPGW) and 7#6 Alumoweld

Insulators: Porcelain/Glass

ROW Width: 150’

Structure Types: **Exhibit 6:** Single Circuit Steel Pole Deadend Structure (Qty. 2)
Exhibit 7: Single Circuit Steel H-Frame Suspension V-String Structure (Qty. 3)
Exhibit 8: Single Circuit Steel H-Frame Suspension Flat V-String Structure (Qty. 7)
Exhibit 9: Single Circuit Steel H-Frame Suspension V-String Structure (Qty. 2)

Exhibit 10: Single Circuit Tubular Steel 3-Pole Deadend Structure (Qty. 2)

Exhibit 11: Single Circuit Tubular Steel H-Frame Strain Structure (Qty. 3)

Exhibit 12: Single Circuit Tubular Steel H-Frame Suspension Structure (Qty. 20)

4906-6-05 (B)(9)(b): Electric and Magnetic Fields

There are zero (0) occupied residences or institutions within 100 feet from the edge of right-of-way containing the affected 138 kV Transmission Lines. Therefore, Electric and Magnetic Field (“EMF”) calculations are not needed for the Project.

4906-6-05(B)(9)(c): Estimated Cost

The estimated cost for the proposed Project is \$53,438,000. Although not statutorily required for approval, at the request of OPSB Staff, the estimate is a Class 3 estimate and ATSI confirms that ATSI’s costs will be captured and allocated via FERC formula rates for the ATSI Transmission Zone, Attachment H-21 in the PJM OATT.

4906-6-05(B)(10): Social and Ecological Impacts

4906-6-05(B)(10)(a): Land Uses

The Project is in the Village of Stratton, Brush Creek and Saline Townships, Jefferson County, Ohio. The majority of the land use in the vicinity of the project is mainly forest land use. No significant changes or impacts to the current land use are anticipated.

4906-6-05(B)(10)(b): Agricultural Land

A list of all agricultural land and acreage, including agricultural district land, is provided in **Exhibit 5**.

4906-6-05(B)(10)(c): Archaeological or Cultural Resources

As part of the investigation for this Letter of Notification, TRC Companies, Inc. (“TRC”) requested database information from the Ohio Historic Preservation Office (SHPO) on March 26, 2026, for the Project Study Area (Area of Potential Effects or APE) with a one

(1)-mile search radius. On April 16, 2026, SHPO replied to the request, attached as **Exhibit 13**. SHPO concurred that the Project as proposed will have no effect on historic properties. No further coordination is required for the Project unless the scope of work changes or archaeological resources are discovered during the course of the Project. To date, TRC has not conducted any on-site cultural resources surveys.

The SHPO database includes a catalog of all historic properties listed in or eligible for listing in the National Register of Historic Places (NRHP), including districts, sites, building, structures, and objects that are significant in American history, architecture, archeology, engineering, and culture. The results of the search identified no NRHP-listed resources within one (1)-mi of the proposed Project. There are three (3) SHPO Determinations of Eligibility (DOE) recorded within one (1)-mi. **Table 1** below contains a list of the OHPO DOE resources.

Table 1: OHPO DOE Resources within One (1)-mi.

Ref. No.	Resource Name	NRHP Status	Distance	Direction
JEF0098505	-	Eligible, Criteria C	0.40	North
UNK0000000	-	Eligible, Criteria A and C	0.45	East
JEF0098405	-	Eligible, Criteria C	0.52	South

The SHPO database also includes listings on the Ohio Historic Inventory (OHI), the Ohio Archaeological Inventory (OAI), previous cultural resource surveys, and the Ohio Genealogical Society (OGS) cemetery inventory. There are seven (7) additional recorded above-ground historic resources and five (5) Ohio Genealogical Society (OGS) cemeteries recorded within one (1)-mi of the Project Study Area. The nearest of the above-ground resources are situated 0.02 mi east of the Project Study Area while the nearest OGS cemetery is 0.06 mi northeast.

There have been 13 archaeological surveys completed within one (1)-mi. of the Project Study Area. Of these, three (3) surveys partially overlap with portions of the Project Study Area. There are 15 recorded archaeological sites that have been recorded within one (1)-mi of the Project Study Area. None of the sites overlap with the Project Study Area. These

sites include six (6) precontact sites and nine (9) historic sites. The historic sites date to the nineteenth and twentieth centuries while several of the precontact sites have diagnostic artifacts that date to the Archaic period.

The Project Study Area consists of an existing, maintained utility right-of-way (ROW) surrounded by wooded landscapes, agricultural fields, pastures, and residential properties. Currently, as proposed, no new tree clearing is anticipated within the ROW. There will be some tree clearing required for access road construction. The proposed Project is not expected to have any adverse effects on known historic properties.

4906-6-05 (B)(10)(d): Construction Filings with Local, State, and Federal Governmental Agencies

Coordination with the Jefferson County Engineer's Office, Village of Stratton, Saline Township, Brush Creek Township, and Ohio Department of Transportation (ODOT) will be completed to obtain ROW permits for work with the applicable ROW and special hauling permit and/or Road Use and Maintenance Agreement (RUMA) if necessary. If more than one (1) acre of earth disturbance is proposed in the Project scope, then submittal of a Notice of Intent (NOI) application to the Ohio EPA will be required for coverage under the general construction stormwater permit (OHC000006), and the Storm Water Pollution Prevention Plan (SWPPP) will be submitted to the Jefferson County Soil and Water Conservation District (SWCD) for review. Portions of the Project are located within a 100-year FEMA floodplain; however, no ground disturbance or Project activities are proposed within the regulated 100-year floodplain; therefore, coordination with Jefferson County's Soil and Water Conservation District Floodplain Administrator is not required. If the Project scope changes and work will be done within the regulated floodplain, proper coordination will be completed before construction commences. All permitting and/or coordination necessary to comply with local, state, and federal agencies with jurisdiction regarding this Project will be completed prior to the commencement of construction. A list of potential government agency requirements is provided in Table 2 below.

Table 2. List of Potential Government Agency Requirements

Agency	Requirement
Ohio EPA	General NPDES Construction Storm Water Permit OHC000006
Ohio Department of Transportation (ODOT)	ROW Permits
Jefferson County Engineer's Office, Village of Stratton, Brush Creek Township and Saline Township Coordination	ROW, Special Hauling Permit or RUMA
Jefferson County SWCD	SWPPP Review

4906-6-05 (B)(10)(e): Endangered, Threatened, Rare and Designated Species Investigation

As part of the investigation, TRC submitted a request to the Ohio Department of Natural Resources (“ODNR”) Office of Real Estate to conduct an Environmental Review. As part of the Environmental Review, the ODNR Office of Real Estate conducted a search of the ODNR Division of Wildlife’s (“DOW”) Natural Heritage Database to research the presence of any endangered, threatened, or rare species within one (1) mile of the Project Study Area. The ODNR’s Office of Real Estate’s response dated March 20, 2026, indicated that there are 11 records of state and/or federally listed plants, animals, and communities located within a one-mile radius of the Project Study Area. Additionally, the Project is within the range of 12 state and/or federally listed plants or animal species. A copy of ODNR’s Office of Real Estate’s response is included as **Exhibit 14**. A list of all endangered, threatened, and rare species, as identified by ODNR, within a one-mile radius of the Project is provided in Table 3 and a list of all endangered, threatened, and rare species, as identified by ODNR, within the range of the Project is provided in Table 4.

Table 3. List of Endangered, Threatened, and Rare Species within a One-mile Radius of Project Study Area

Common Name	Scientific Name	Federal Listed Status	State Listed Status	Affected Habitat
Amphibian				
Eastern hellbender	<i>Cryptobranchus alleganiensis</i>	Proposed Endangered	Endangered	Large, swift flowing streams where they hide during the day under large rocks.
Bird				
Cerulean warbler	<i>Setophaga cerulea</i>	N/A	Species of Concern	Large tracts of mature deciduous forest.
Fish				
American eel	<i>Anguilla rostrata</i>	N/A	Threatened	Perennial streams.
Channel darter	<i>Percina copelandi</i>	N/A	Threatened	Perennial streams.
Longhead darter	<i>Percina macrocephala</i>	N/A	Endangered	Perennial streams.
River darter	<i>Percina shumardi</i>	N/A	Threatened	Perennial streams.
Longnose dace	<i>Rhinichthys cataractae</i>	N/A	Species of Concern	Perennial streams.
Plants and Plant Communities				
Shale barren pussy-toes	<i>Antennaria virginica</i>	N/A	Threatened	In full sun on banks of calcareous shales; known Ohio populations are on west or south facing exposures.
Common oak fern	<i>Gymnocarpium dryopteris</i>	N/A	Endangered	Mesic woods and slopes, often with hemlock.
Carolina catchfly	<i>Silene caroliniana</i> ssp. <i>pennsylvanica</i>	N/A	Threatened	Dry open woods, gravelly, rocky or shaley banks and clearings.
Beech-sugar maple forest plant community	N/A	N/A	N/A	N/A

Table 4. List of Endangered and Threatened Species within Range of Project Study Area

Common Name	Scientific Name	Federal Listed Status	State Listed Status	Affected Habitat
Amphibian				
Eastern hellbender	<i>Cryptobranchus alleganiensis</i>	Proposed Endangered	Endangered	Large, swift flowing streams where they hide during the day under large rocks.
Birds				
Northern Harrier	<i>Circus hudsonius</i>	N/A	Endangered	Marshes and grasslands.
Fish				
American eel	<i>Anguilla rostrata</i>	N/A	Threatened	Perennial streams.
Channel darter	<i>Percina copelandi</i>	N/A	Threatened	Perennial streams.
Goldeye	<i>Hiodon alosoides</i>	N/A	Endangered	Perennial streams.
Ohio lamprey	<i>Ichthyomyzon bdellium</i>	N/A	Endangered	Perennial streams.
Paddlefish	<i>Polyodon spathula</i>	N/A	Threatened	Perennial streams.
River darter	<i>Percina shumardi</i>	N/A	Threatened	Perennial streams.
Mammals				
Indiana Bat	<i>Myotis sodalis</i>	Endangered	Endangered	Trees, forests, caves, and caverns.
Little Brown Bat	<i>Myotis lucifugus</i>	N/A	Endangered	Trees, forests, caves, and caverns.
Northern Long-eared Bat	<i>Myotis septentrionalis</i>	Endangered	Endangered	Trees, forests, caves, and caverns.
Tricolored Bat	<i>Perimyotis subflavus</i>	Proposed Endangered	Endangered	Trees, forests, caves, and caverns.

Based on the information received from correspondence with ODNR, the Project is within the vicinity of records for the little brown bat. Since the presence of a state endangered bat species has been established in the area, summer tree clearing is not recommended by ODNR. The Project is also within the ranges of the Indiana bat, the northern long-eared bat, the little brown bat, and the tricolored bat. These bat species predominantly roost in trees behind loose, exfoliating bark, in crevices, and cavities, or in the leaves. These species are dependent on the forest structure surrounding the roost tress. The DOW recommended a desktop bat hibernaculum assessment be completed for the Project, which TRC completed for ATSI and submitted to ODNR on May 7, 2026. ODNR responded on June 17, 2026, attached as **Exhibit 15**, concurring that no caves, cliffs, or mine openings occur in the Project Study Area. The response also stated that despite the presence of an abandoned underground mine within the Project Study Area, the lack of portals and appropriate habitat suggests that this Project is not likely to impact hibernating bats, and that the DOW

approves of the proposed avoidance plan to minimize risk to hibernating bats. In assessing compliance with NWP General Condition 18. If any tree clearing is needed as a result of this Project, it will take place within the USFWS recommended tree clearing dates (October 1 - March 31). Due to proposed seasonal tree clearing, and that there are no impacts to bat species anticipated as a result of the construction of this Project.

ODNR stated that the Project must not have an impact on native mussels. This applies to both listed and non-listed species, as all species of mussel are protected in Ohio. If in-water work is planned in a stream that meets any of the Ohio Mussel Survey Protocol criteria, the DOW recommends the applicant provide information to indicate no mussel impacts will occur. Since no in-water work is proposed for the Project, impacts to mussels are not likely.

The Project is within the range of state-listed fish described in Table 4. The DOW recommends no in-water work in perennial streams from March 15 through June 30 to reduce impacts to indigenous aquatic species and their habitat. Since no in-water work is proposed a perennial stream, this Project will not impact these or other aquatic species.

The Project is within the range of the eastern hellbender (*Cryptobranchus alleganiensis alleganiensis*), a state endangered species and a federal species of concern. This long-lived, entirely aquatic salamander inhabits perennial streams with large flat rocks. Due to the type of work proposed, this Project is not likely to impact this species.

The Project is within the range of the northern harrier (*Circus hudsonius*), a state endangered bird species. This species prefers marshes and grasslands where they often hunt and nest in loose colonies. Due to a lack of suitable habitat within the maintained utility ROW, the Project is not likely to impact this species.

Three rare plant species, shale barren pussy-toes (*Antennaria virginica*, state threatened), Carolina catchfly (*Silene caroliniana ssp. pennsylvanica*, state threatened), and common oak fern (*Gymnocarpium dryopteris*, state endangered), have been recorded within the footprint of the proposed Project. Due to the possible disruption of these species, ODNR requested

a pre-construction survey be conducted to ensure that these plants and any other rare species within the proposed construction limits are avoided and not impacted. A site visit was conducted by ODNR field botanists on May 19, 2026, within the Project Study Area. Correspondence was received on May 20, 2026, attached as **Exhibit 16**, from the Division of Natural Areas and Preserves' Chief Botanist, Rick Gardner, stating that no rare plants were found within the Project Study Area and no further coordination was deemed necessary for the Project.

In addition, TRC submitted a Technical Assistance request to USFWS on February 19, 2026, to research the presence of any endangered, threatened, rare, or designated species within the Project Study Area. A copy of the USFWS' response, dated February 24, 2026, attached as **Exhibit 17**.

USFWS' response indicated that the proposed Project Study Area contains trees greater than 3 inches in diameter. They recommend avoiding tree removal wherever possible. If any caves or abandoned mines may be disturbed, further coordination is requested to determine if fall or spring portal surveys are warranted. If no caves or abandoned mines are present and trees greater than 3 inches in diameter cannot be avoided, USFWS recommends the removal of any trees greater than 3 inches in diameter only occur between October 1 and March 31. If bridges or culverts will be impacted, USFWS recommends reviewing Appendix K in the most recent "Range-Wide Indiana Bat & Northern Long-Eared Bat Survey Guidelines" to determine if the bridge/culvert may be suitable roost habitat. To avoid adverse effects, USFWS recommends impacts to suitable bridges and culverts only occur from October 1 and March 31. In addition, the USFWS response stated that Indiana bat and/or northern long-eared bat presence has been confirmed in the Project vicinity. If any tree clearing is needed as a result of this Project, it will take place within the USFWS recommended tree clearing dates (October 1 - March 31). Due to proposed seasonal tree clearing, and that there will be no impacts to bridges, culverts, or underground mines or caves, this Project is not likely to impact these species.

USFWS has proposed to list the monarch butterfly (*Danaus plexippus*) as threatened under the ESA. This species is found throughout the state of Ohio. Threats include habitat loss – particularly the loss of milkweed, the monarch caterpillar’s sole food source – and mortality resulting from pesticide use. USFWS recommends the following actions to maintain habitat and avoid impacts to monarchs in Ohio: revegetate disturbed areas with native plant species including nectar-producing plants and milkweed endemic to the area; limit mowing monarch habitat from March 15 to August 31 when monarchs are breeding and from September 1 to October 31 when large numbers of monarchs are migrating; and avoid the use of pesticides and herbicides in and near monarch habitat. In order to avoid impacts to this species, any mowing in monarch habitat will be limited to the restriction dates outlined above and no spraying will occur within or near monarch habitat.

USFWS also stated that due to the Project type, size, and location, they do not anticipate adverse effects to any other federally endangered, threatened, or proposed species, or proposed or designated critical habitat.

4906-6-05 (B)(10)(f): Areas of Ecological Concern

TRC performed field investigations to identify and delineate wetlands and waterbodies located within the Project Study Area on November 7-8, and 11, 2024, November 12-13, 2025, and March 20, 2026. Four (4) palustrine emergent wetlands (W-JDV-1, W-JDV-2, W-JDV-3, W-TPT-1) were identified and delineated within the Project Study Area. A Surface Water Delineation Report for the Project Study Area is included as **Exhibit 18**.

The Project Study Area consists of an existing, maintained utility ROW within agricultural, industrial, and residential land use and forested habitat. TRC did not observe the presence of any of the ODNR or federally listed species during the field investigation due to the maintained nature of the utility ROW. In addition, no rare plants were found by ODNR field botanists during the May 2026 site visit within the Project Study Area. Therefore, no impacts are anticipated to any of the listed species detailed in the ODNR correspondence.

The LOD will be completely within the Project Study Area and will predominantly include using the existing utility ROW for the proposed construction. As proposed, Project activities would fall under Nationwide Permit (NWP) 6 and 57 (effective March 15, 2026, valid through March 14, 2031). NWP 6 authorizes survey activities, such as core sampling and other exploratory-type bore holes, exploratory trenching, soil surveys, sampling, sample plots or transects for wetland delineations, and historic resources surveys, provided the discharge of dredged or fill material does not exceed 0.10-acre in waters of the United States. NWP 57 authorizes the construction of access roads for the construction and maintenance of electric utility lines or telecommunication lines, including overhead lines and substations, in nontidal waters of the United States, provided the activity does not cause the loss of greater than 0.5-acre of waters of the United States. NWP Regional and General Conditions were reviewed regarding this Project. This Project is located in Brush Creek and Saline Townships, and the Village of Stratton, Jefferson County, Ohio, which is within the U.S. Army Corps of Engineers (USACE) Pittsburgh Regulatory District. Brush Creek and Saline Townships are not listed in Table 1 of Regional General Condition 6(a) (Threatened and Endangered Species). It is anticipated that jurisdictional resources will not be impacted by the proposed Project, and therefore NWP 6 and 57 and Ohio Environmental Protection Agency (OEPA) 401 Water Quality Certification terms and conditions are met and based on the current scope of work for this Project, there is no potential trigger for a Section 404 Pre-Construction Notification to USACE or Individual 401 Water Quality Certification application to OEPA.

A review of the USGS Protected Areas Database (www.usgs.gov/programs/gap-analysis-project/science/protected-areas) revealed the following state conservation area within the Project Study Area: Brush Creek Wildlife Area. The portion of the Project Study Area located within Brush Creek Wildlife Area falls under an existing license agreement for the transmission line ROW. Coordination with management of the state conservation area will be conducted prior to construction of the proposed Project to ensure full compliance with all applicable terms and conditions.

4906-6-05(B)(10)(g): Additional Information

Construction and operation of the proposed Project will be in accordance with the requirements specified in the latest revision of the National Electrical Safety Code as adopted by the Public Utilities Commission of Ohio (PUCO) and will meet all applicable safety standards established by the Occupational Safety and Health Administration. No other or unusual conditions are expected that will result in significant environmental, social, health or safety impacts.

4906-6-07: Documentation of Letter of Notification Transmittal and Availability for Public Review

This Letter of Notification application is being provided concurrently with its docketing with the Board to the following officials.

Jefferson County

Mr. Eric Timmons
Jefferson County Commissioner
301 Market St.
Steubenville, OH 43952
commissioners@jeffersoncountyoh.com

Mr. Ronald Kleineke
Jefferson County Commissioner
301 Market St.
Steubenville, OH 43952
commissioners@jeffersoncountyoh.com

Mr. Tony Morelli
Jefferson County Commissioner
301 Market St.
Steubenville, OH 43952
commissioners@jeffersoncountyoh.com

Mr. Eric Hilty, P.E., P.S.
Jefferson County Engineer's Office
598 St. Route43
Steubenville, OH 43952

Mr. Mark Nelson
County Soil & Water District
Chair
500 Market St. Mezzanine Suite 4
Steubenville, OH 43952
JSWCD@jeffersoncountyoh.com

Village of Stratton

Mr. Paul Zdinak, Mayor
136 2nd Ave
Po Box 145
Stratton, OH 43961

Ms. Kelly Householder, Council
136 2nd Ave
Po Box 145
Stratton, OH 43961

Mr. Leon Nelson, Council
136 2nd Ave
Po Box 145
Stratton, OH 43961

Ms. Billie Wilson, Council
136 2nd Ave
Po Box 145
Stratton, OH 43961

Mr. Tom Abdalla, Council
136 2nd Ave
Po Box 145
Stratton, OH 43961

Ms. Tom Byers, Council
136 2nd Ave
Po Box 145
Stratton, OH 43961

Saline Township

Mr. Charles Crawford
Trustee
164 County Road 50A
PO Box 177
Hammondsville, OH 43930

Mr. Tyler Holland
Trustee
164 County Road 50A
PO Box 177
Hammondsville, OH 43930

Mr. Danny Householder
Trustee
164 County Road 50A
PO Box 177
Hammondsville, OH 43930

Ms. Debra Parsons
Fiscal Officer
164 County Road 50A
PO Box 177
Hammondsville, OH 43930

Brush Creek Township

Mr. Ellis Cronin Jr.
Trustee
6710/6724 County Road 55
Salineville, Oh 43945

Mr. Adam Grubbs
Trustee
6710/6724 County Road 55
Salineville, Oh 43945

Mr. Christopher Rawlings
Trustee
6710/6724 County Road 55
Salineville, Oh 43945

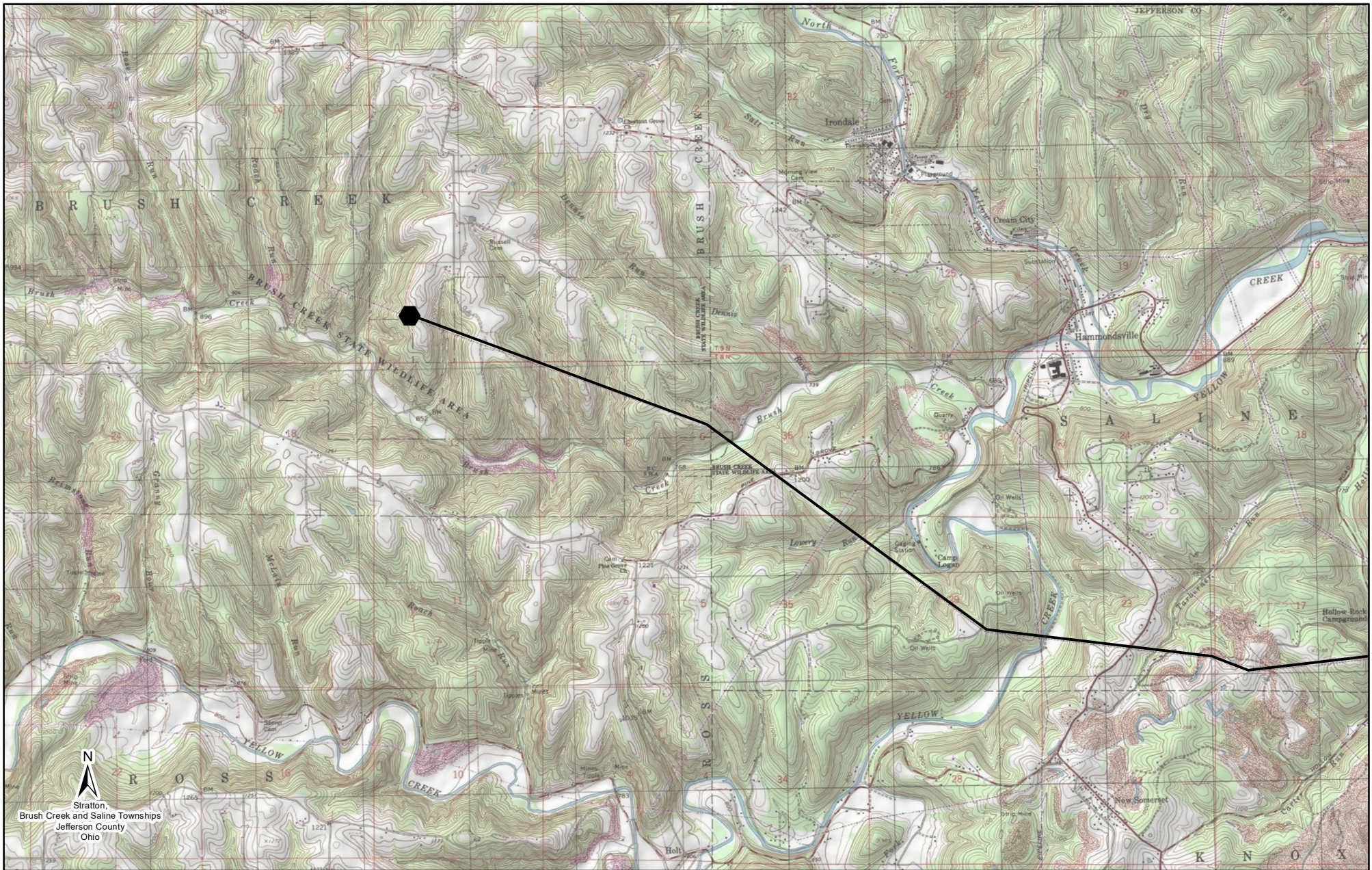
Ms. Brenda Chronister
Fiscal Officer
6710/6724 County Road 55
Salineville, Oh 43945

Library

Mr. Michael Gray
Jefferson County Public Library
407 S 4th St.
Steubenville, OH 43952
mgray@seolibraries.org

Per Adm.Code 4906-6-07(B), exemplar copies of the notice letters sent to local government officials and to the library have been included with this application as proof of compliance with requirements of Adm.Code 4906-6-07(A)(1) and 4906-6-07(A)(2).

Information is posted at www.firstenergycorp.com/about/transmission_project/ohio.html on how to request an electronic or paper copy of this Letter of Notification application. The link to this website is being provided in accordance with Adm.Code 4906-6-07(B), which requires ATSI to provide the OPSB with proof of compliance with Adm.Code 4906-6-07(A)(3)



LEGEND:

- Structure 39
- ▲ Sammis Substation
- Transmission Line

0 2,050 4,100 8,200
Feet

Reference:
USGS Topographical Overlay

Coordinate System:
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WKID: 3734 Authority: EPSG

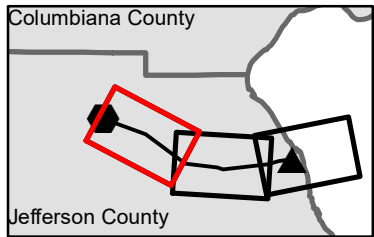
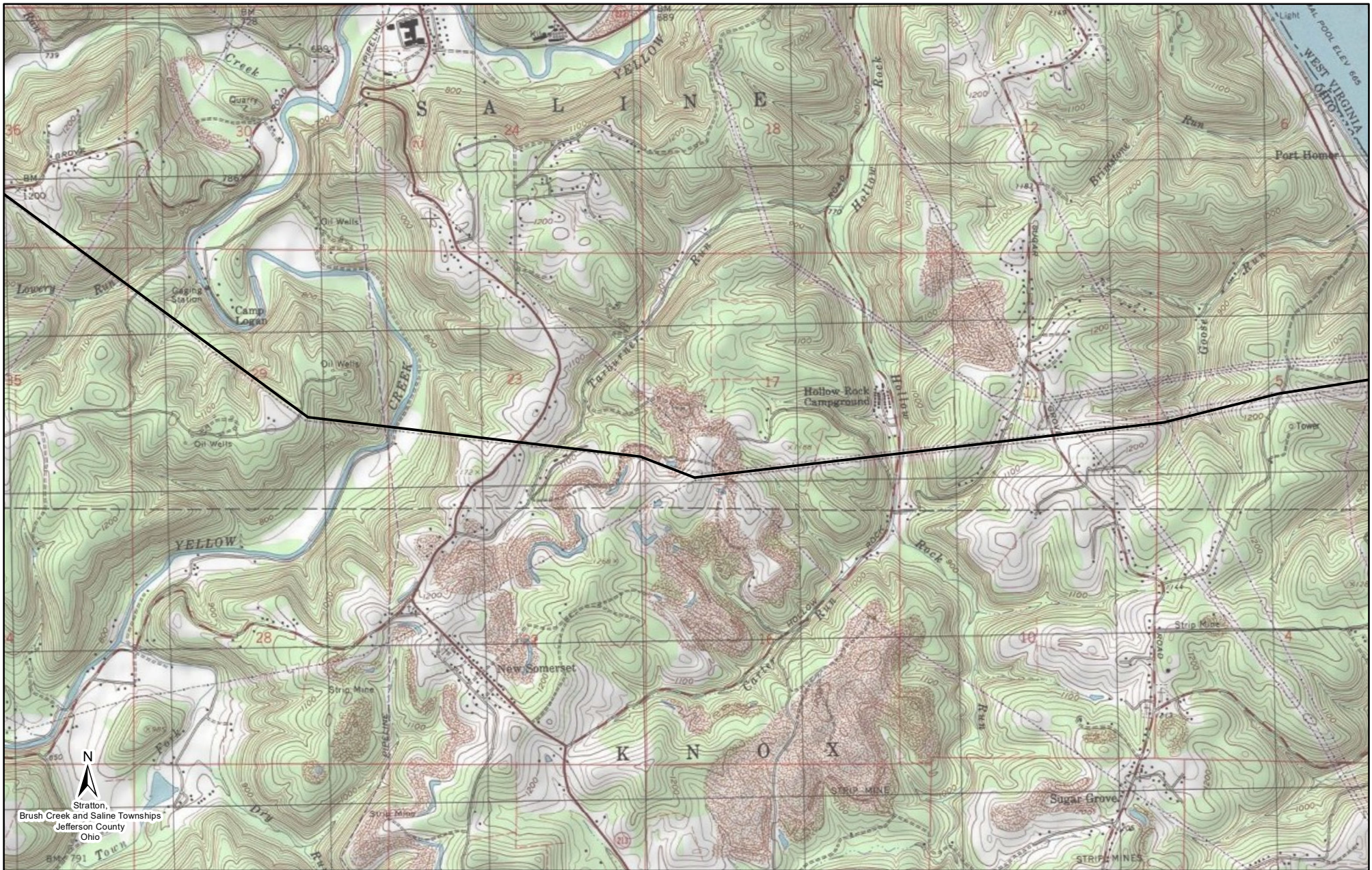
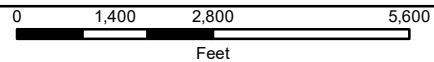


EXHIBIT 1		American Transmission Systems, Inc. a subsidiary of FirstEnergy Corp.
SAMMIS-STAR 345 kV TRANSMISSION LINE REBUILD PROJECT (SAMMIS SUBSTATION TO STRUCTURE 39 SEGMENT)		
Page 1 of 3		



- LEGEND:**
- Structure 39
 - ▲ Sammis Substation
 - Transmission Line



Reference:
USGS Topographical Overlay

Coordinate System:
NAD_1983_StatePlane_Ohio_North_FIPS_3401_Feet
WKID: 3734 Authority: EPSG

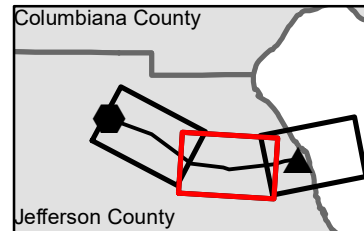


EXHIBIT 1



**SAMMIS-STAR 345 kV TRANSMISSION LINE
REBUILD PROJECT
(SAMMIS SUBSTATION TO STRUCTURE 39 SEGMENT)**



LEGEND:

- Structure 39
- ▲ Sammis Substation
- Transmission Line

0 1,650 3,300 6,600
Feet

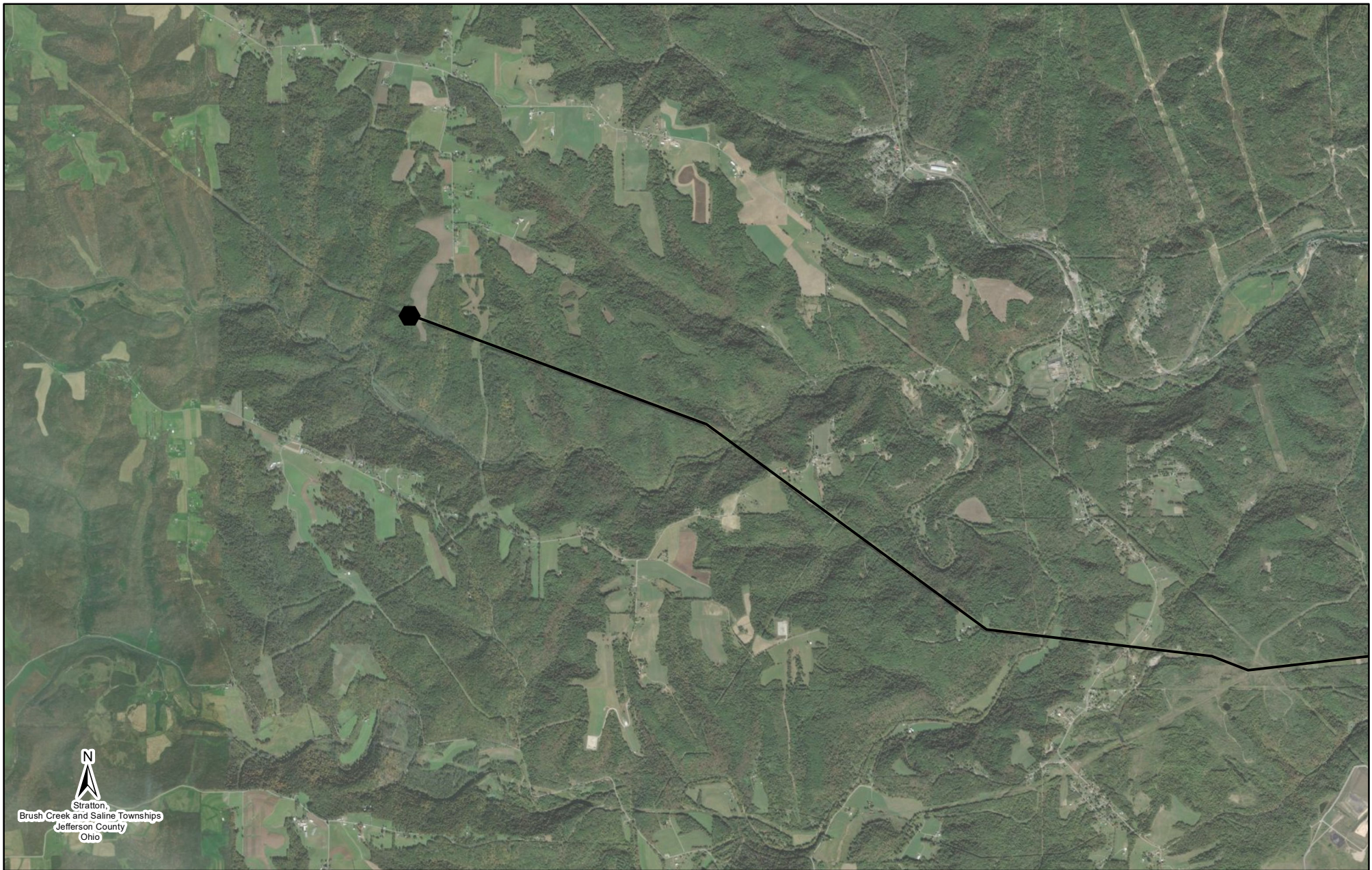
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Coordinate System:
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WKID: 3734 Authority: EPSG

Columbiana County

Jefferson County

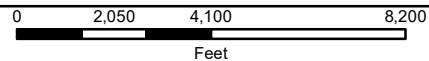
EXHIBIT 1		 ATSI American Transmission Systems, Inc. a subsidiary of FirstEnergy Corp.
SAMMIS-STAR 345 kV TRANSMISSION LINE REBUILD PROJECT (SAMMIS SUBSTATION TO STRUCTURE 39 SEGMENT)		
		Page 3 of 3



N
Stratton,
Brush Creek and Saline Townships
Jefferson County
Ohio

LEGEND:

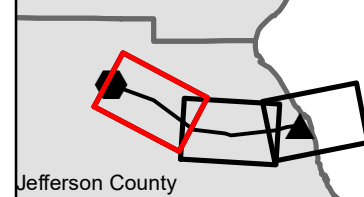
- Structure 39
- ▲ Sammis Substation
- Transmission Line



Reference:
USGS Topographical Overlay

Coordinate System:
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Columbiana County

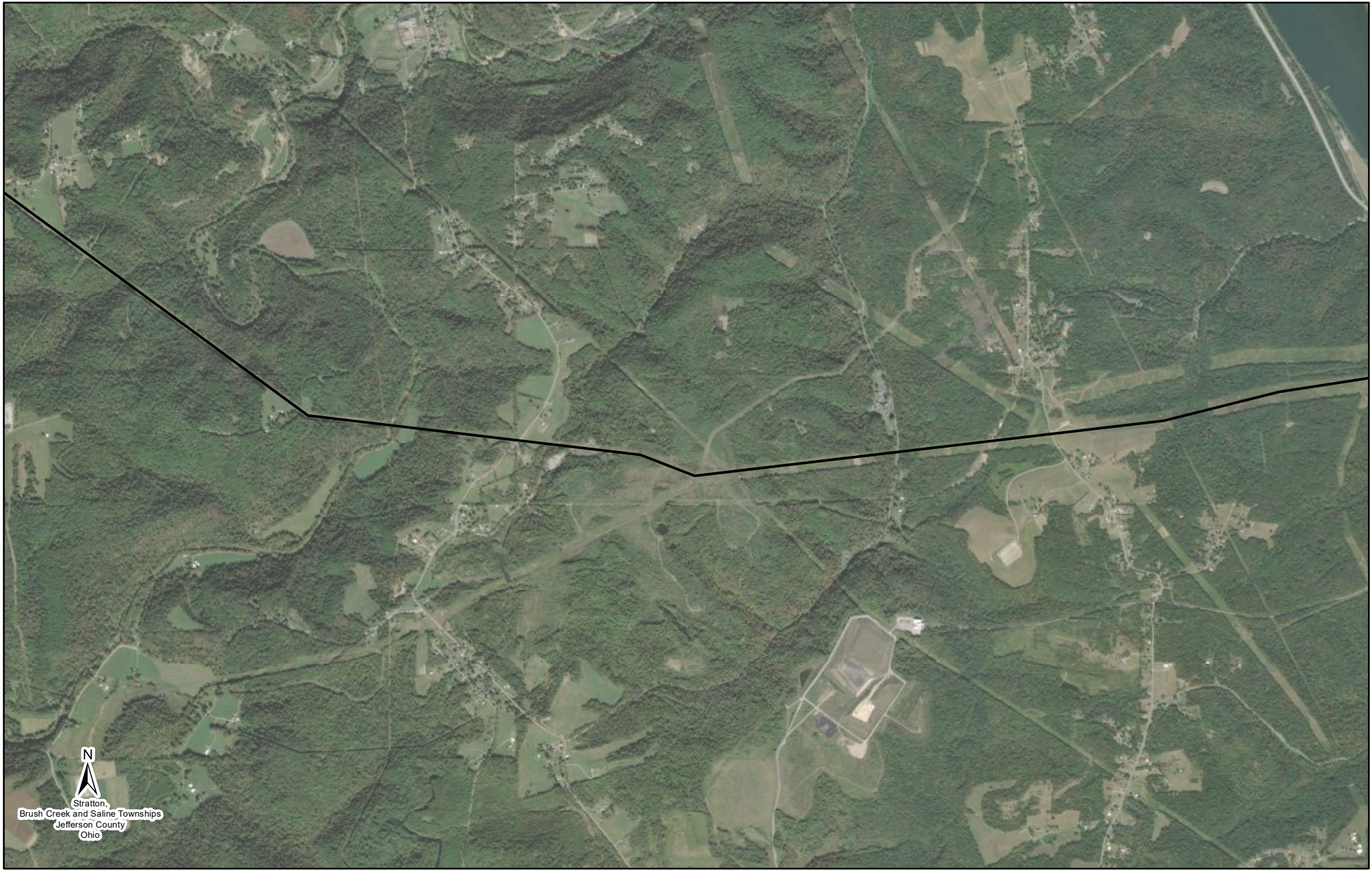


Jefferson County

EXHIBIT 2



**SAMMIS-STAR 345 kV TRANSMISSION LINE
REBUILD PROJECT
(SAMMIS SUBSTATION TO STRUCTURE 39 SEGMENT)**



N
Stratton
Brush Creek and Saline Townships
Jefferson County
Ohio

LEGEND:

- Structure 39
- ▲ Sammis Substation
- Transmission Line

0 1,400 2,800 5,600
Feet

Reference:
USGS Topographical Overlay

Coordinate System:
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WKID: 3734 Authority: EPSG

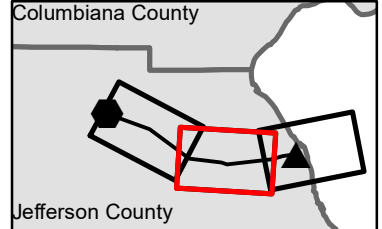


EXHIBIT 2		ATSI American Transmission Systems, Inc. a subsidiary of FirstEnergy Corp.
SAMMIS-STAR 345 kV TRANSMISSION LINE REBUILD PROJECT (SAMMIS SUBSTATION TO STRUCTURE 39 SEGMENT)		
Page 2 of 3		




 Stratton
 Brush Creek and Saline Townships
 Jefferson County
 Ohio

LEGEND:

-  Structure 39
-  Sammis Substation
-  Transmission Line

0 1,650 3,300 6,600
 Feet

Reference:
 USGS Topographical Overlay

Coordinate System:
 NAD_1983_StatePlane_Ohio_North_FIPS_3401_Feet
 WKID: 3734 Authority: EPSG

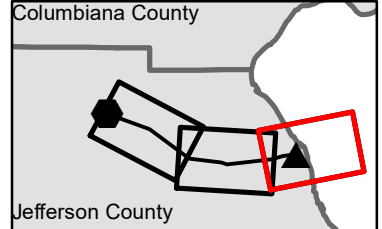
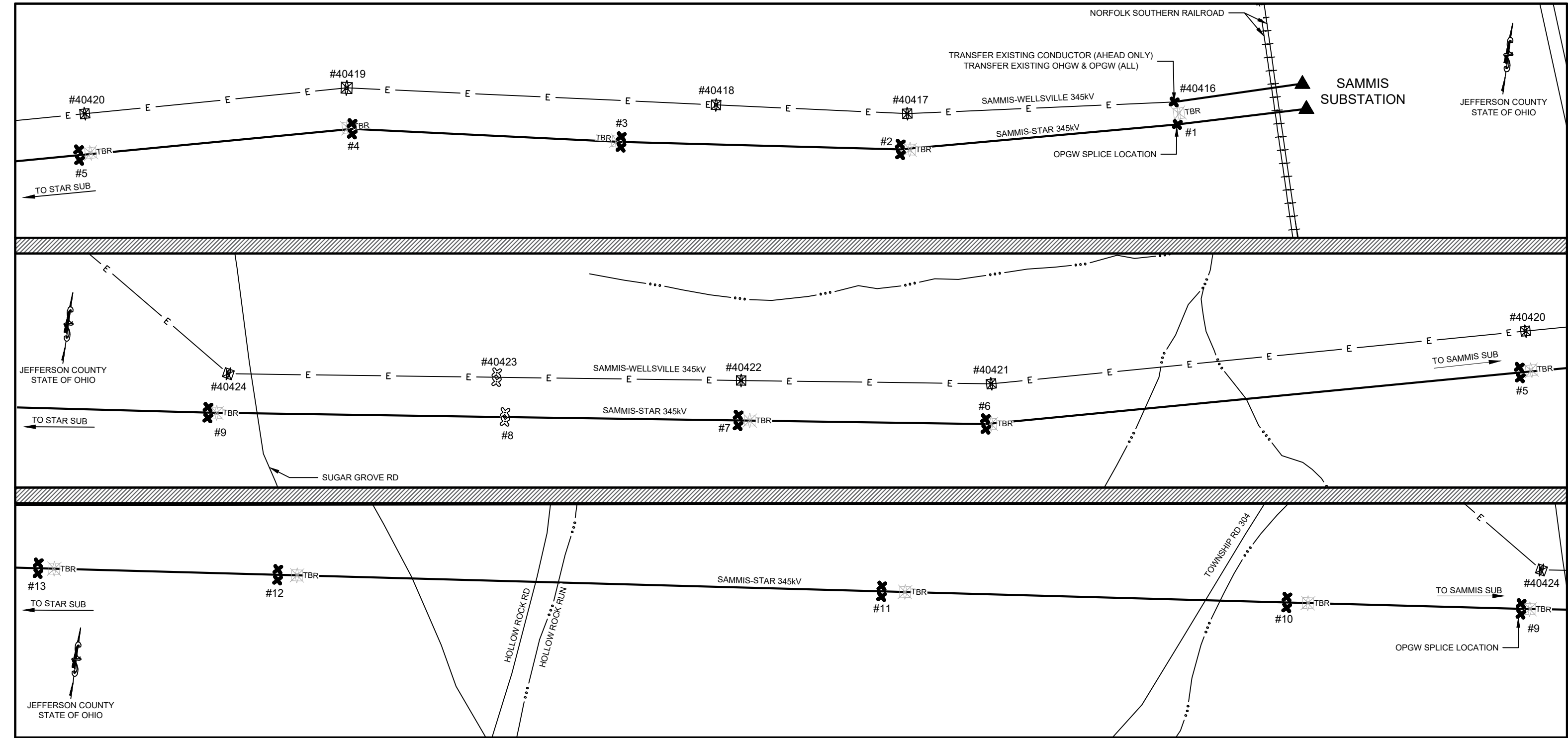


EXHIBIT 2		 ATSI [®] American Transmission Systems, Inc. a subsidiary of FirstEnergy Corp.
SAMMIS-STAR 345 kV TRANSMISSION LINE REBUILD PROJECT (SAMMIS SUBSTATION TO STRUCTURE 39 SEGMENT)		
		Page 3 of 3

PAPER SIZE: 17X11



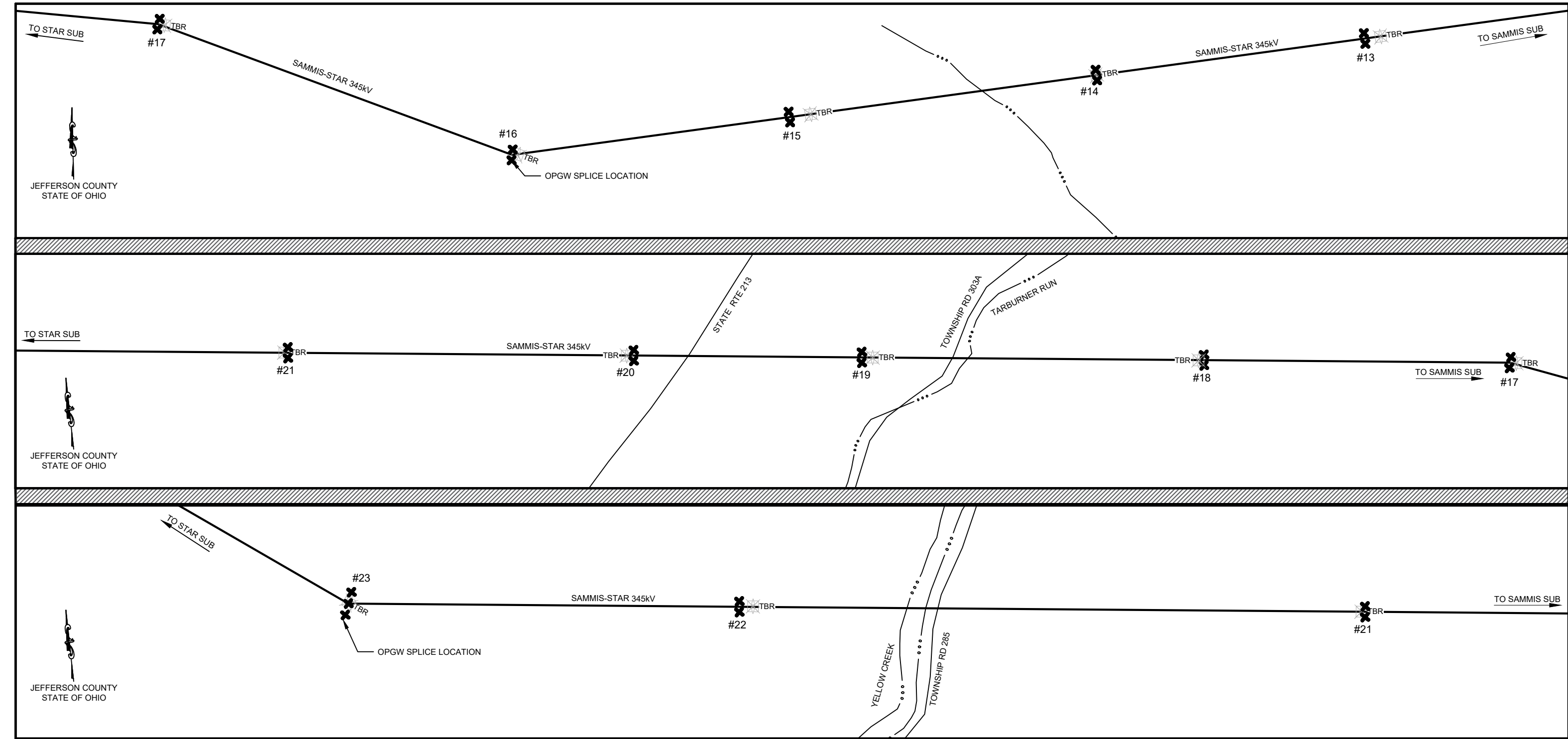
LEGEND			
	- FIRSTENERGY SUBSTATION		- TRANSMISSION LINE
	- EXISTING LATTICE TOWER		- ROAD CENTERLINE
	- LATTICE TOWER (TO BE REMOVED)		- EXISTING TRANSMISSION LINE
	- EXISTING STEEL POLE		- RAILROAD
	- NEW STEEL POLE		- CREEK/STREAM



Exhibit 3

SAMMIS-STAR 345 kV TRANSMISSION LINE
REBUILD PROJECT
(SAMMIS SUBSTATION TO STRUCTURE 39 SEGMENT)

General Layout



LEGEND

TBR

- LATTICE TOWER (TO BE REMOVED)

- NEW STEEL POLE

- TRANSMISSION LINE

- ROAD CENTERLINE

- CREEK/STREAM

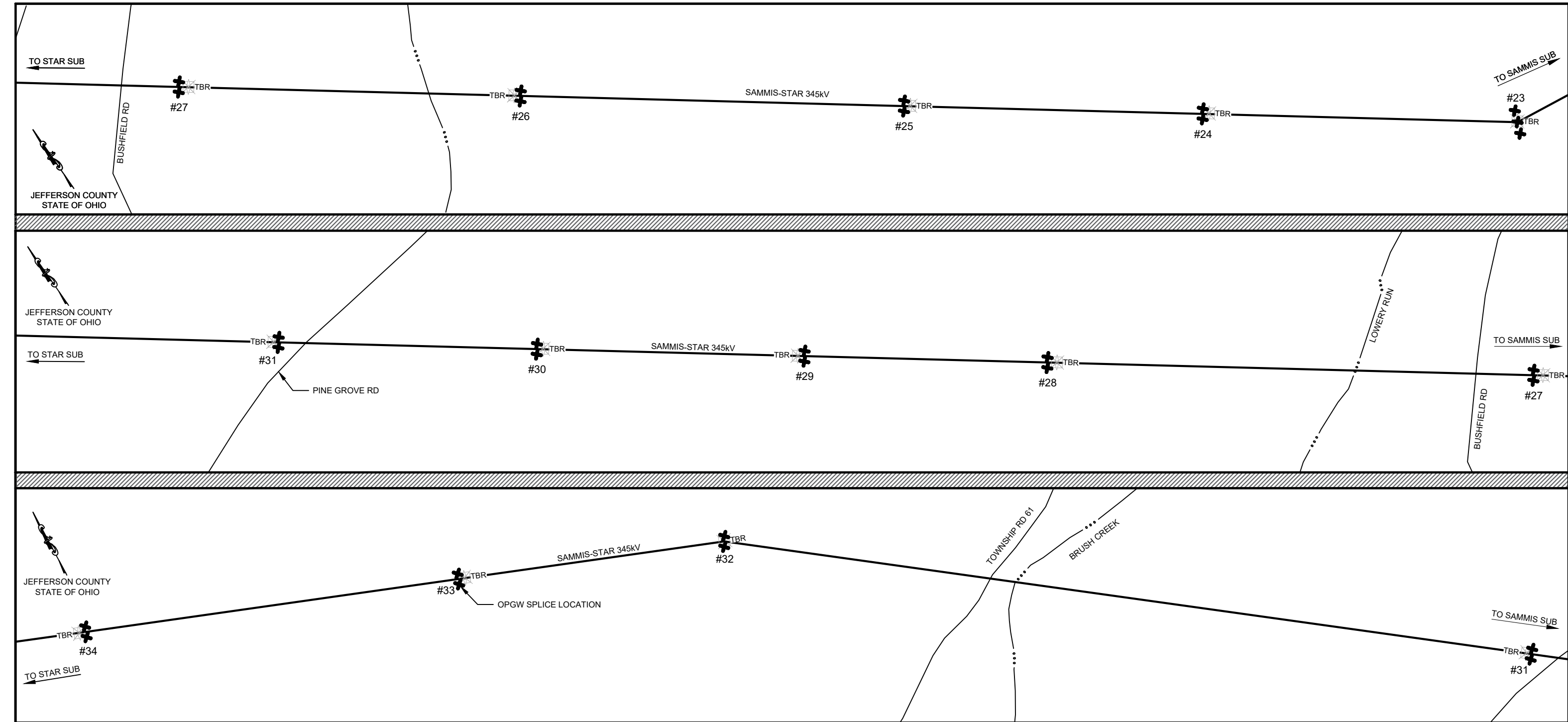
ATSI[®]
American Transmission Systems, Inc.
a subsidiary of Westinghouse Corp.

Exhibit 3

SAMMIS-STAR 345 kV TRANSMISSION LINE
REBUILD PROJECT
(SAMMIS SUBSTATION TO STRUCTURE 39 SEGMENT)

General Layout

PAPER SIZE: 17X11



LEGEND

 TBR

- LATTICE TOWER (TO BE REMOVED)



- NEW STEEL POLE



- TRANSMISSION LINE



- ROAD CENTERLINE



- CREEK/STREAM



American Transmission Systems, Inc.
a subsidiary of FirstEnergy Corp.

Exhibit 3

SAMMIS-STAR 345 kV TRANSMISSION LINE
REBUILD PROJECT
(SAMMIS SUBSTATION TO STRUCTURE 39 SEGMENT)

General Layout

ATSI Transmission Zone M-3 Process Sammis – Star 345 kV Line

Need Number: ATSI-2024-027

Process Stage: Need Meeting 04/02/2024

Project Driver:

Equipment Material Condition, Performance and Risk

Specific Assumption Reference:

System Performance Global Factors

- Past system reliability/performance

Line Condition Rebuild/Replacement

- System characteristics including structural capacity needs
- Current design criteria, applicable codes and industry best practices

Problem Statement:

- The Sammis – Star 345 kV Line was constructed approximately 64 years ago. It is approximately 69 miles long and consists of 375 steel lattice towers and 22 wood pole H-frame structures.
- Suspension towers are susceptible to cascading failures.
 - A tornado-induced tower failure destroyed 13 towers due to cascading.
- Current modeling techniques indicate the steel towers do not have the structural strength to withstand NESC required load cases, nor the additional wind and ice load cases required by FirstEnergy.
- Existing Transmission Line Ratings:
 - 1382 / 1712 / 1637 / 2116 MVA (SN/SE/WN/WE)

