Subregional RTEP Committee – Western FirstEnergy Supplemental Projects

June 14, 2024

Needs

Stakeholders must submit any comments within 10 days of this meeting in order to provide time necessary to consider these comments prior to the next phase of the M-3 process



Process Stage: Need Meeting - 06/14/2024

Project Driver:

Equipment Material Condition, Performance and Risk

Specific Assumption Reference:System Performance Global Factors

Past system reliability/performance

Line Condition Rebuild/Replacement

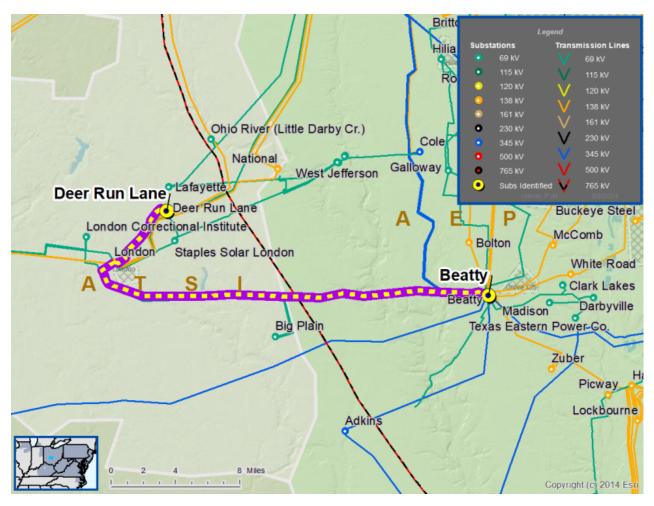
Age/condition of wood pole transmission line structures

Broken conductor strands at multiple locations.

Problem Statement:

- The Beatty (AEP) Deer Creek 138 kV Line was constructed approximately 65 years ago and is approaching end of life. It is approximately 11 miles long with 74 wood transmission line structures.
- Recent inspections have indicated the line is exhibiting deterioration. Inspection findings include:
 - Broken conductor strands under suspension clamps at multiple locations confirmed via lab testing.
 - 15 H-frame crossarms are experiencing physical sag.
 - 72 structures exhibit early signs of decay.
 - 4 structures require replacement due to woodpecker damage.
- Since 2014, the line has had 19 unscheduled outages.
- Existing Transmission Line Ratings:
 - 200 / 242 / 226 / 286 MVA (SN/SE/WN/WE)

ATSI Transmission Zone M-3 Process Beatty (AEP) – Deer Creek 138 kV Line





Process Stage: Need Meeting – 06/14/2024

Supplemental Project Driver(s):

Customer Service

Specific Assumption Reference(s):

New customer connection request will be evaluated per FirstEnergy's "Requirements for Transmission Connected Facilities" document and "Transmission Planning Criteria" document.

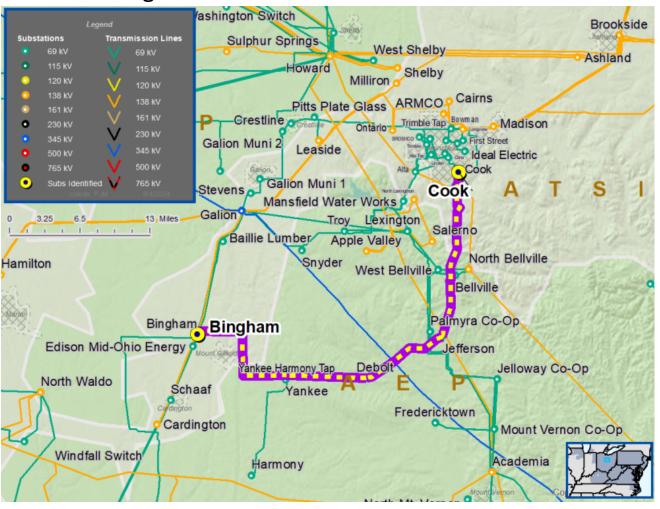
Problem Statement

New Customer Connection – Ohio Edison distribution has requested 69 kV service for load of approximately 11 MVA near the Bingham – Cook 69 kV Line. The request is approximately two miles from Cook Substation.

Requested In-Service Date:

June 1, 2025

ATSI Transmission Zone M-3 Process Bingham – Cook 69 kV Line Customer Connection





Process Stage: Need Meeting – 06/14/2024

Supplemental Project Driver(s):

Customer Service

Specific Assumption Reference(s):

New customer connection request will be evaluated per FirstEnergy's "Requirements for Transmission Connected Facilities" document and "Transmission Planning Criteria" document.

Problem Statement

New Customer Connection – A retail customer is requesting to retire an existing 69 kV delivery point on the Adams - Shinrock 69 kV Line. In addition, the customer is requesting a new 69 kV delivery point on the same transmission line to replace the retired delivery point which will have an anticipated load of 35 MVA. The request is approximately 500 feet from Adams Substation.

Requested In-Service Date:

October 31, 2025

ATSI Transmission Zone M-3 Process Adams - Shinrock 69 kV Line Customer Connection





ATSI Transmission Zone M-3 Process East Springfield 138 kV Customer Connection

Need Number: ATSI-2024-044

Process Stage: Need Meeting - 06/14/2024

Supplemental Project Driver(s):

Customer Service

Specific Assumption Reference(s):

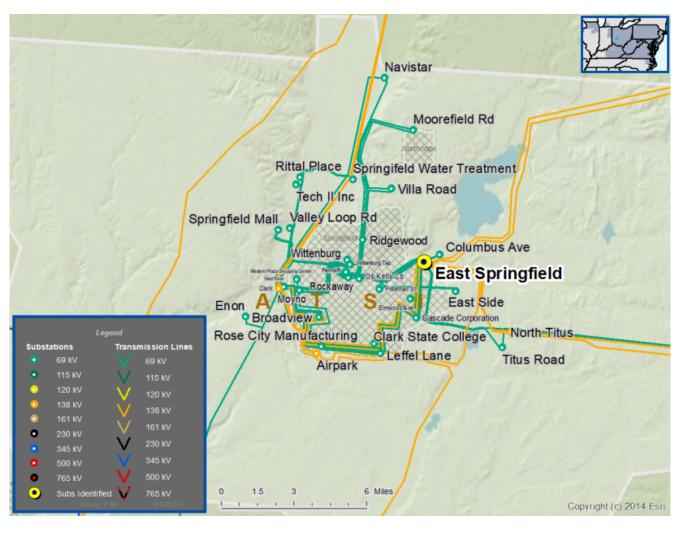
New customer connection request will be evaluated per FirstEnergy's "Requirements for Transmission Connected Facilities" document and "Transmission Planning Criteria" document.

Problem Statement

New Customer Connection – A retail customer has requested a new 138 kV delivery point in the East Springfield area. The anticipated load of the new customer connection is 200 MVA.

Requested In-Service Date:

September 25, 2026





Process Stage: Need Meeting – 06/14/2024

Supplemental Project Driver(s):

Customer Service

Specific Assumption Reference(s):

New customer connection request will be evaluated per FirstEnergy's "Requirements for Transmission Connected Facilities" document and "Transmission Planning Criteria" document.

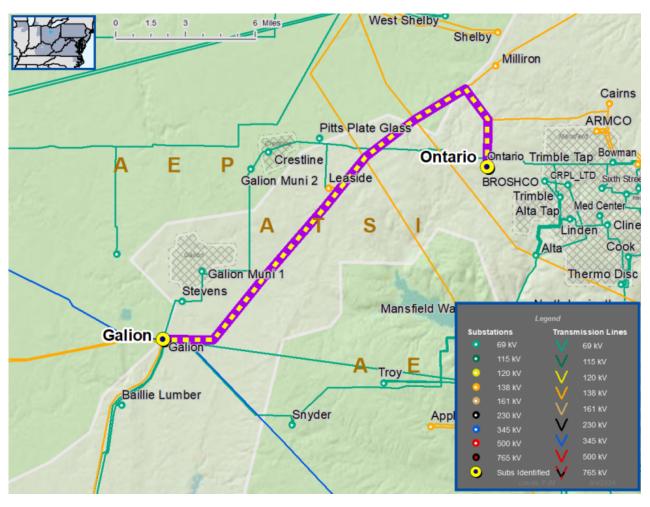
Problem Statement

New Customer Connection – A retail customer has requested a new 138 kV delivery point near the Galion – Ontario 138 kV Line. The anticipated load of the new customer connection is 63 MVA. The request is approximately 1,000 feet from Ontario Substation.

Requested In-Service Date:

December 31, 2025

ATSI Transmission Zone M-3 Process Galion – Ontario 138 kV Line Customer Connection





ATSI Transmission Zone M-3 Process Ashtabula – Ashtabula East 138 kV Line

Need Number: ATSI-2024-054

Process Stage: Need Meeting – 6/14/2024

Supplemental Project Driver(s):

Operational Flexibility and Efficiency Equipment Material Condition, Performance and Risk Infrastructure Resilience

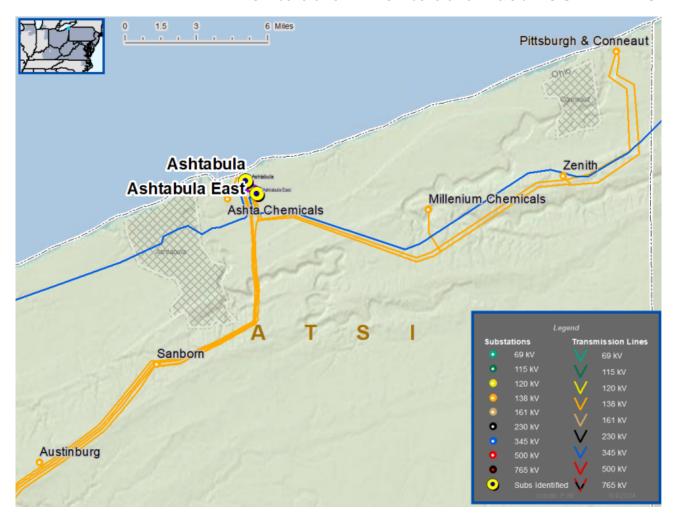
Specific Assumption Reference(s):

System Performance Projects Global Considerations

- System reliability and performance
- Load at risk in planning and operational scenarios
- Capability to perform system maintenance

Problem Statement:

- The Ashtabula Ashtabula East 138 kV Line is 0.30 miles long and serves one distribution substation.
- Maintenance work cannot be preformed on certain sections of the Ashtabula –
 Ashtabula East 138 kV Line without an outage to the Ashtabula East Substation.
- Ashtabula East Substation serves approximately 16 MW of load and 36,000 customers.
- Since 2015, the Ashtabula Ashtabula East 138 kV Line has experienced two unscheduled sustained outages.



Solutions

Stakeholders must submit any comments within 10 days of this meeting in order to provide time necessary to consider these comments prior to the next phase of the M-3 process



Process Stage: Solutions Meeting – 06/14/2024
Previously Presented: Need Meeting – 08/14/2020

Supplemental Project Driver(s):

Equipment Material Condition, Performance and Risk

Specific Assumption Reference(s)

Line Condition Rebuild / Replacement

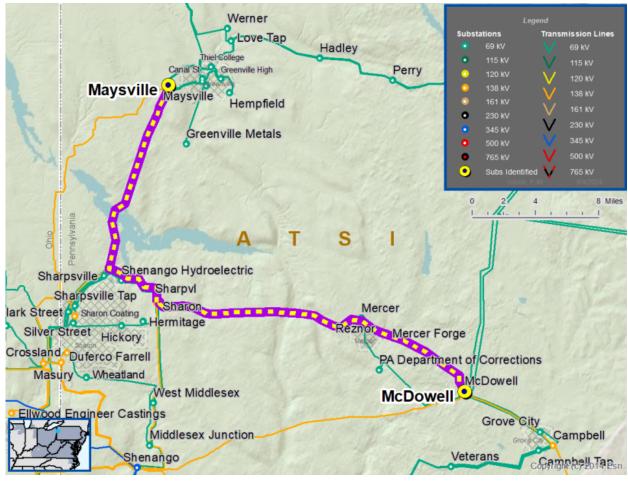
- Aged or deteriorated transmission line structures
- Negatively impact customer outage frequency and/or durations
- Demonstrate an increasing trend in maintenance findings and/or costs

Problem Statement:

Maysville-McDowell 69 kV Line (~33 miles):

- Line was originally constructed in the 1960s. The average age of structures on this line are 54 years old. FirstEnergy has historically experienced an average age of reject for wood poles to be 48.7 years.
- Line survey in 2019 showed a structure reject rate of 86% (528 of 613). The primary reasons for reject were woodpecker holes, wood pole decay, and pole top extensions previously used to mitigate the issue of pole top rot, an indicator that the pole is deteriorating.
- Conductor condition is deteriorating with over 40 conductor splices in a 30-mile line section.
- Terminal end equipment at McDowell should be upgraded due to age and condition.
- Obsolete line switches (A-2092, A-2091, A-2143 N.O.) are no longer supported by the manufacturer.

ATSI Transmission Zone M-3 Process Maysville – McDowell 69 kV Line





Process Stage: Solutions Meeting – 06/14/2024

Proposed Solution:

Maysville-McDowell 69 kV Line Rebuild

- Rebuild the Maysville-McDowell 69 kV Line, excluding the line section from Werner Substation to Hartstown Substation (total rebuild length approximately 35 miles).
- Replace three obsolete line switches.
- Replace the 69 kV circuit breaker B26 and associated disconnect switches at McDowell Substation.
- Replace the substation conductor at Greenville Substation.
- Upgrade line relaying at McDowell Substation.
- Update relay settings at Maysville Substation.

Transmission Line Ratings:

■ Maysville - Greenville 69 kV Line

Before Proposed Solution: 62 / 77 / 78 / 101 MVA (SN/SE/WN/WE)

After Proposed Solution: 80 / 96 / 90 / 114 MVA (SN/SE/WN/WE)

■ Greenville - Hempfield 69 kV Line

Before Proposed Solution: 37 / 46 / 47 / 61 MVA (SN/SE/WN/WE)

After Proposed Solution: 80 / 96 / 90 / 114 MVA (SN/SE/WN/WE)

Hempfield – Werner 69 kV Line

Before Proposed Solution: 37 / 46 / 47 / 61 MVA (SN/SE/WN/WE)

After Proposed Solution: 80 / 96 / 90 / 114 MVA (SN/SE/WN/WE)

■ Werner – Hadley 69 kV Line

Before Proposed Solution: 62 / 77 / 78 / 101 MVA (SN/SE/WN/WE)

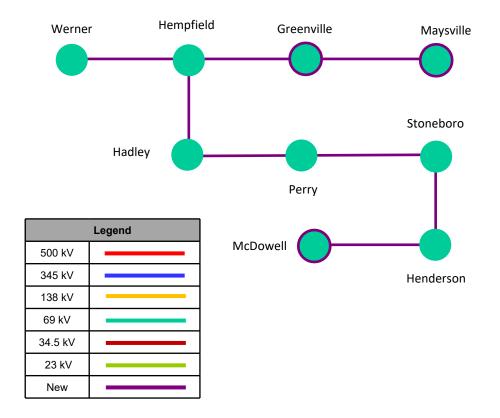
After Proposed Solution: 80 / 96 / 90 / 114 MVA (SN/SE/WN/WE)

■ Hadley – Perry 69 kV Line

Before Proposed Solution: 62 / 77 / 78 / 101 MVA (SN/SE/WN/WE)

After Proposed Solution: 80 / 96 / 90 / 114 MVA (SN/SE/WN/WE)

ATSI Transmission Zone M-3 Process Maysville – McDowell 69 kV Line





Process Stage: Solutions Meeting – 06/14/2024

Transmission Line Ratings Continued:

■ Perry – Stoneboro 69 kV Line

Before Proposed Solution: 62 / 77 / 78 / 101 MVA (SN/SE/WN/WE)

After Proposed Solution: 80 / 96 / 90 / 114 MVA (SN/SE/WN/WE)

■ Stoneboro – Henderson 69 kV Line

Before Proposed Solution: 47 / 56 / 53 / 67 MVA (SN/SE/WN/WE)

After Proposed Solution: 80 / 96 / 90 / 114 MVA (SN/SE/WN/WE)

■ Henderson - McDowell 69 kV Line

Before Proposed Solution: 47 / 56 / 53 / 67 MVA (SN/SE/WN/WE)

After Proposed Solution: 80 / 96 / 90 / 114 MVA (SN/SE/WN/WE)

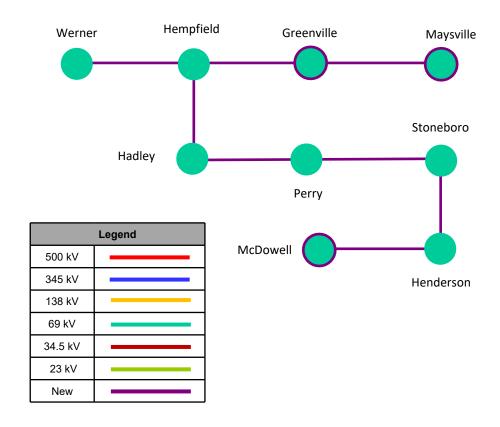
Alternatives Considered:

Maintain existing condition and elevated risk of failure due to aging infrastructure.

Estimated Project Cost: \$55.3 M
Projected In-Service: 7/25/2028
Status: Conceptual

Model: 2023 RTEP model for 2028 Summer (50/50)

ATSI Transmission Zone M-3 Process Maysville – McDowell 69 kV Line





ATSI Transmission Zone M-3 Process Cascade (Cedar Street) 69 kV Line

Need Number: ATSI-2022-001

Process Stage: Solution Meeting – 06/14/2024

Previously Presented: Need Meeting – 02/18/2022

Supplemental Project Driver(s):

Equipment Material Condition, Performance and Risk

Specific Assumption Reference(s):

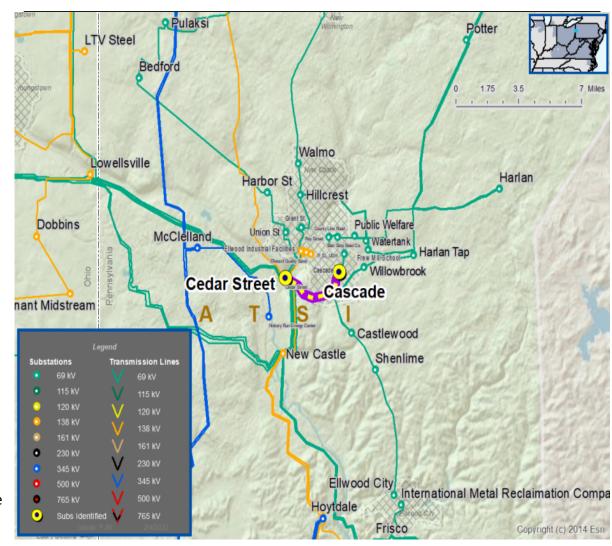
Line Condition Rebuild / Replacement

- Aged or deteriorated wood pole transmission line structures
- Negatively impact customer outage frequency and/or durations
- Demonstrate an increasing trend in maintenance findings and/or costs
- Transmission line ratings are limited by terminal equipment

Problem Statement:

Cascade 69 kV (~18.3 miles) Line:

- The average age of structures on this line are 55 years old.
- The Cascade (Cedar Street) 69 kV line is exhibiting an upward trend in both minor and major maintenance required with 108 open priority conditions.
- Recent inspections show a structure reject rate of 38% (117 of 307). The primary reasons for reject were cracked and deteriorated wood poles, woodpecker holes, and failed insulators.
- 3 out of the 11 line switches on the Cascade (Cedar Street) 69 kV line are obsolete and no longer meet established design standards.
- The Cascade (Cedar Street) 69 kV line has experienced 14 unscheduled outages in the past five years (5 sustained).





Process Stage: Solutions Meeting – 06/14/2024

Proposed Solution:

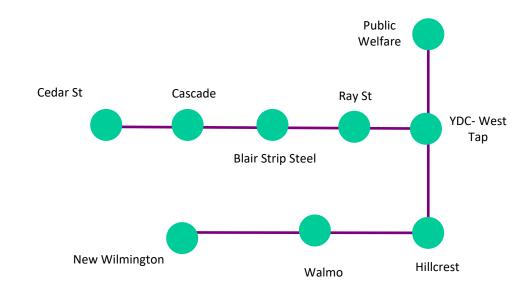
Cascade (Cedar Street) 69 kV Line

• Reconductor the Cascade (Cedar Street) 69 kV Line, approximately 18.3 miles.

Transmission Line Ratings:

- Cedar St Cascade 69kV Line
 - Before Proposed Solution: 80 / 96 / 90 / 114 MVA (SN/SE/WN/WE)
- After Proposed Solution: 80 / 96 / 90 / 114 MVA (SN/SE/WN/WE)
- Blair Strip Steel Cascade 69kV Line
- Before Proposed Solution: 80 / 96 / 90 / 114 MVA (SN/SE/WN/WE)
- After Proposed Solution: 80 / 96 / 90 / 114 MVA (SN/SE/WN/WE)
- Blair Strip Steel Ray St 69kV Line
 - Before Proposed Solution: 80 / 96 / 90 / 114 MVA (SN/SE/WN/WE)
 - After Proposed Solution: 80 / 96 / 90 / 114 MVA (SN/SE/WN/WE)
- Ray St YDC- West Tap 69kV Line
 - Before Proposed Solution: 80 / 96 / 90 / 114 MVA (SN/SE/WN/WE)
 - After Proposed Solution: 80 / 96 / 90 / 114 MVA (SN/SE/WN/WE)
- Public Welfare YDC- West Tap 69kV Line
 - Before Proposed Solution: 47 / 56 / 53 / 67 MVA (SN/SE/WN/WE)
- After Proposed Solution: 80 / 96 / 90 / 114 MVA (SN/SE/WN/WE)
- Hillcrest YDC- West Tap 69kV Line
 - Before Proposed Solution: 80 / 96 / 90 / 114 MVA (SN/SE/WN/WE)
- After Proposed Solution: 80 / 96 / 90 / 114 MVA (SN/SE/WN/WE)

ATSI Transmission Zone M-3 Process Cascade (Cedar Street) 69 kV Line



Legend	
500 kV	
345 kV	
138 kV	
69 kV	
34.5 kV	
23 kV	
New	



Process Stage: Solution Meeting – 06/14/2024

Transmission Line Ratings:

■ Hillcrest – Walmo 69kV Line

Before Proposed Solution: 80 / 96 / 90 / 114 MVA (SN/SE/WN/WE)

After Proposed Solution: 80 / 96 / 90 / 114 MVA (SN/SE/WN/WE)

■ New Wilmington – Walmo 69kV Line

Before Proposed Solution: 47 / 48 / 53 / 53 MVA (SN/SE/WN/WE)

After Proposed Solution: 80 / 96 / 90 / 114 MVA (SN/SE/WN/WE)

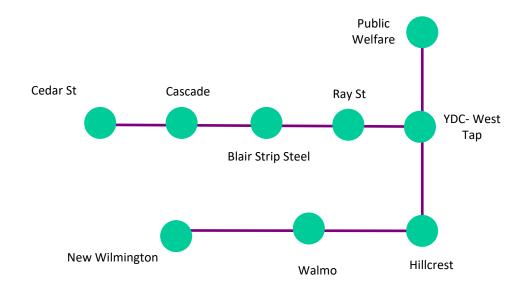
Alternatives Considered:

• Maintain existing condition and elevated risk of failure due to aging infrastructure.

Estimated Project Cost: \$34.7 M
Projected In-Service: 3/31/2028
Status: Conceptual

Model: 2023 RTEP model for 2028 Summer (50/50)

ATSI Transmission Zone M-3 Process Cascade (Cedar Street) 69 kV Line



Legend	
_	



ATSI Transmission Zone M-3 Process West Unity (Stryker) 69 kV Line

Need Number: ATSI-2022-006

Process Stage: Solutions Meeting – 06/14/2024
Previously Presented: Need Meeting – 03/18/2022

Supplemental Project Driver(s):

Equipment Material Condition, Performance, and Risk Infrastructure Resilience

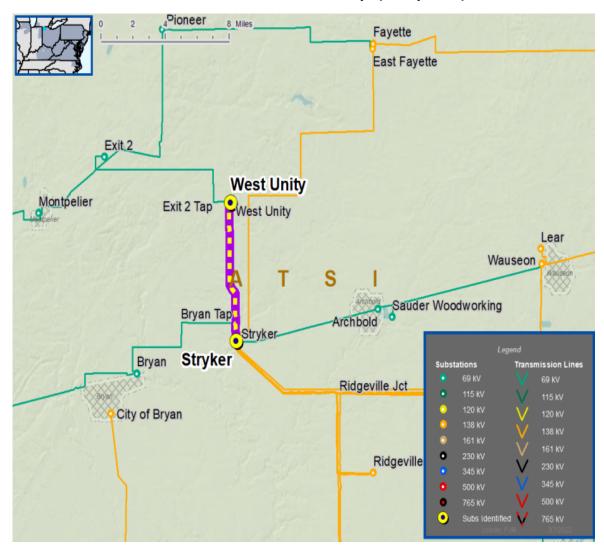
Specific Assumption Reference(s):

System Performance Projects Global Factors

- System Reliability and Performance
- Increasing negative trend in maintenance findings
- Age/condition of transmission line conductor, hardware and structures
- Negatively impact customer outage frequency and/or duration

Problem Statement

- The West Unity (Stryker) 69 kV Line (~11.2 miles) is wood pole construction that is aged and experiencing degradation:
 - 53 of 258 structures had defects noted that could negatively impact reliability, with the most common defect noted being structure decay.
 - 235 of 258 structures are aged and reaching the end of their useful life, with average date of installation of 1967.
- A stretch of double circuit structures were replaced in the 1990's (~1.5 miles) and found to be in fair condition.





Process Stage: Solutions Meeting – 06/14/2024

Proposed Solution:

West Unity (Stryker) 69 kV Line Rebuild

■ Rebuild the West Unity (Stryker) 69 kV Line (total rebuild length approximately 11.6 miles).

Transmission Line Ratings:

■ Snyder – West Unity 69 kV Line

Before Proposed Solution: 72 / 87 / 84 / 107 MVA (SN/SE/WN/WE)

After Proposed Solution: 111 / 135 / 126 / 159 MVA (SN/SE/WN/WE)

Stryker - West Unity 69 kV Line

Before Proposed Solution: 72 / 87 / 84 / 107 MVA (SN/SE/WN/WE)

After Proposed Solution: 111 / 135 / 126 / 159 MVA (SN/SE/WN/WE)

Alternatives Considered:

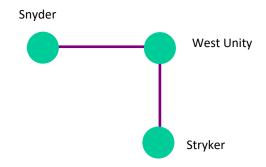
Maintain existing condition and elevated risk of failure due to aging infrastructure.

Estimated Project Cost: \$18.1M

Projected In-Service: 12/31/2025 Status: Conceptual

Model: 2023 RTEP model for 2028 Summer (50/50)

ATSI Transmission Zone M-3 Process West Unity (Stryker) 69 kV Line



Legend	
500 kV	
345 kV	
138 kV	
69 kV	
34.5 kV	
23 kV	
New	



Process Stage: Solution Meeting -6/14/2024Previously Presented: Need Meeting -05/19/2022

Supplemental Project Driver(s):

FE's Requirement for Transmission Connected Facilities
Operational Flexibility and Efficiency
Equipment Material Condition, Performance and Risk
Infrastructure Resilience
Customer Service

Specific Assumption Reference(s):

System Performance Projects Global Factors

- System reliability and performance
- Substation/Line equipment limits
- Customer Service

Equipment/Technology/Design upgrades

- FirstEnergy-owned equipment located in non-FirstEnergy affiliated facilities.
- Expected service life (at or beyond) or obsolescence

Add/Replace Transformer

 System concerns related to loss of an existing transformer or other contingency scenarios at a specific voltage level(s)

Continued on next page...

ATSI Transmission Zone M-3 Process West Lorain Plant Separation





ATSI Transmission Zone M-3 Process West Lorain Plant Separation

Need Number: ATSI-2022-012

Process Stage: Solution Meeting -6/14/2024Previously Presented: Need Meeting -05/19/2022

Problem Statement

- West Lorain plant was previously owned by FE. With the sale of the plant, FE must separate assets owned by FE from assets owned by the new plant owners.
- Station power for West Lorain is sourced from the tertiary windings of the two 345-138-13.2 kV transformers at Beaver Substation.
- The two 345-138-13.2 kV transformers at Beaver are reaching end of life and will be replaced with transformers Refer to supplemental ID s1757.
- 138 kV circuit breaker B-23 is owned by FE. The breaker and breaker controls are located within the West Lorain plant property.
- 345 kV motor operated disconnect switch D-177 is owned by West Lorain but is inside FE's Beaver Substation.
- Relays that protect the 138 kV line from Beaver to West Lorain are owned by FE but are located within the West Lorain property.
- The 345 kV line and the 138 kV line to the West Lorain plant are protected by older electromechanical relays that require additional maintenance and skill to maintain.





ATSI Transmission Zone M-3 Process
West Lorain Plant Separation

Need Number: ATSI-2022-012

Process Stage: Solution Meeting – 6/14/2024

Proposed Solution:

- Install 138 kV tie line breaker and associated relaying at West Lorain
- Install revenue metering equipment on the 138 kV tie line at Beaver
- Remove breaker B-23 and associated relaying
- Upgrade revenue metering equipment for West Lorain units 2-6.
- Transfer ownership of the 345 kV motor operated disconnect switch D-177 at Beaver Substation to ATSI

Alternatives considered:

• Maintain utility-owned equipment in customer facilities

Estimated Project Costs: \$3.56M

Project In-Service Date: 12/1/2025

Status: Engineering

Model: 2023 RTEP model for 2028 Summer (50/50)



Legend	
500 kV	
345 kV	
138 kV	
69 kV	
34.5 kV	
23 kV	
New	



Process Stage: Solution Meeting -6/14/2024Previously Presented: Need Meeting -6/16/2023

Supplemental Project Driver(s):

Operational Flexibility and Efficiency Equipment Material Condition, Performance and Risk Infrastructure Resilience

Specific Assumption Reference(s):

System Performance Projects Global Factors

- System reliability and performance
- Load at risk in planning and operational scenarios

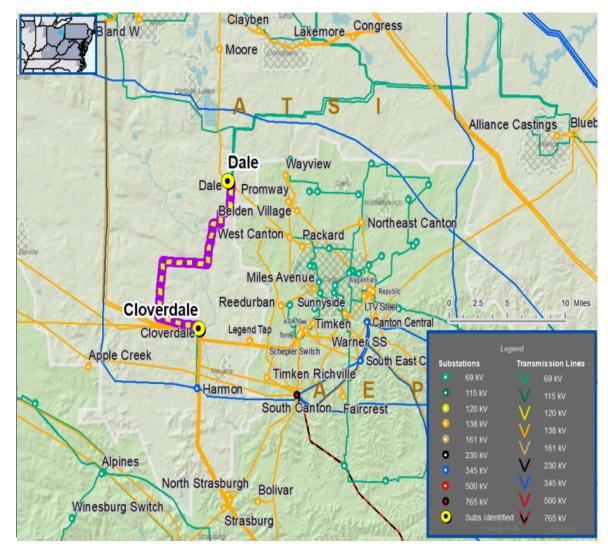
Add/Expand Bus Configuration

- Loss of substation bus adversely impacts transmission system performance
- Eliminate simultaneous outages to multiple networked elements under N-1 analysis
- Accommodate future transmission facilities
- Capability to perform system maintenance

Problem Statement:

- The Cloverdale Dale No. 2 69 kV Line is 14.74 miles and serves seven delivery points.
- A line fault will cause approximately 82 MW consequential loss of load and approximately 18,000 customers at risk.
- Since 2015, the Cloverdale Dale No. 2 69 kV Line has experienced a total of five momentary outages and ten sustained outages.

ATSI Transmission Zone M-3 Process Cloverdale – Dale No. 2 69 kV Line





ATSI Transmission Zone M-3 Process Cloverdale – Dale No. 2 69 kV Line

Need Number: ATSI-2023-012

Process Stage: Solution Meeting – 6/14/2024

Proposed Solution:

Tiger 69 kV Ring Bus

Convert Tiger Substation into a four-breaker ring bus.

Alternatives Considered:

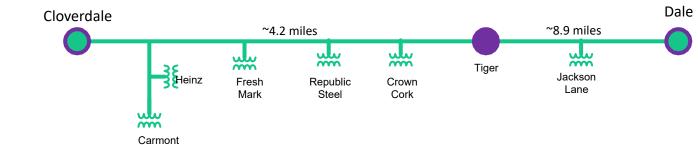
Maintain existing condition with risk of loss of load

Estimated Project Cost: \$5.4M

Projected In-Service Date: 6/19/2028

Status: Conceptual

Model: 2023 RTEP model for 2028 Summer (50/50)



Legend	
500 kV	
345 kV	
138 kV	
69 kV	
34.5 kV	
23 kV	
New	



ATSI Transmission Zone M-3 Process Cloverdale – Harmon 138 kV Line Customer Connection

Need Number: ATSI-2024-041

Process Stage: Solution Meeting – 06/14/2024

Previously Presented: Need Meeting – 05/17/2024

Supplemental Project Driver(s):

Customer Service

Specific Assumption Reference(s):

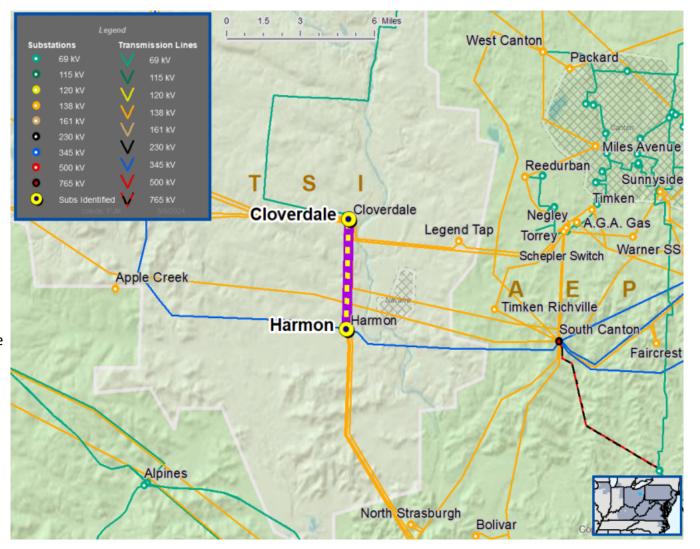
New customer connection request will be evaluated per FirstEnergy's "Requirements for Transmission Connected Facilities" document and "Transmission Planning Criteria" document.

Problem Statement

New Customer Connection – Ohio Edison distribution requested 138 kV service for load of approximately 11 MVA near the Cloverdale - Harmon 138 kV Line. The service request location is approximately 1 mile from Cloverdale Substation.

Requested In-Service Date:

December 31, 2025





ATSI Transmission Zone M-3 Process Cloverdale – Harmon 138 kV Line Customer Connection

Need Number: ATSI-2024-041

Process Stage: Solution Meeting – 06/14/2024

Proposed Solution:

138 kV Transmission Line Tap

- Install one tap-line SCADA controlled switch
- Install SCADA controlled on existing main-line switch
- Construct 0.6 miles of 138 kV line extension
- Adjust relay settings at Cloverdale and Harmon substations
- Install revenue metering

Alternatives Considered:

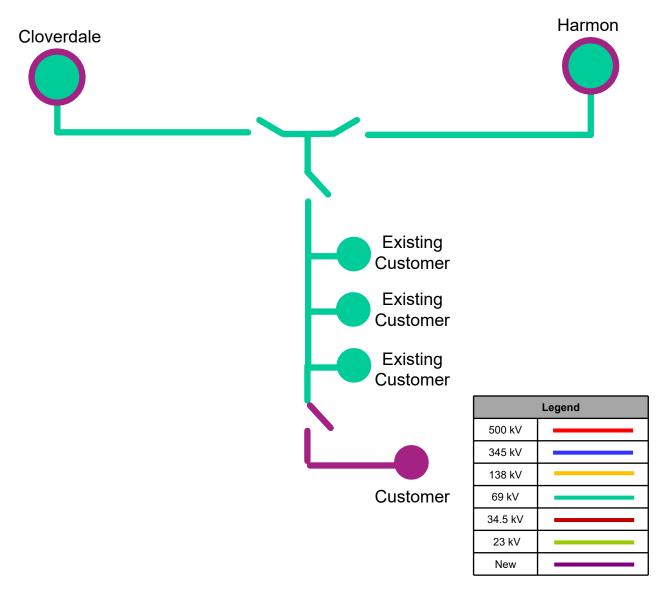
■ No other reasonable alternatives due to the customers proximity to the Cloverdale - Harmon 138 kV Line.

Estimated Project Cost: \$0.7M

Projected In-Service: 5/31/2026

Status: Engineering

Model: 2023 RTEP model for the 2028 Summer (50/50)





ATSI Transmission Zone M-3 Process Abbe – Medina 69 kV Line Customer Connection

Need Number: ATSI-2024-036

Process Stage: Solution Meeting – 06/14/2024

Previously Presented: Need Meeting – 05/17/2024

Supplemental Project Driver(s):

Customer Service

Specific Assumption Reference(s):

New customer connection request will be evaluated per FirstEnergy's "Requirements for Transmission Connected Facilities" document and "Transmission Planning Criteria" document.

Problem Statement

New Customer Connection – A retail customer requested 69 kV service for load of approximately 5 MVA near the Abbe – Medina 69 kV Line. The service request location is approximately 0.1 miles from Abbe Substation.

Requested In-Service Date:

September 30, 2025





ATSI Transmission Zone M-3 Process Abbe – Medina 69 kV Line Customer Connection

Need Number: ATSI-2024-036

Process Stage: Solution Meeting – 06/14/2024

Proposed Solution:

138 kV Transmission Line Tap

- Install one tap-line SCADA controlled switch
- Construct 0.1 miles of 69 kV line extension.
- Adjust relay settings at Abbe and Medina substations
- Install revenue metering

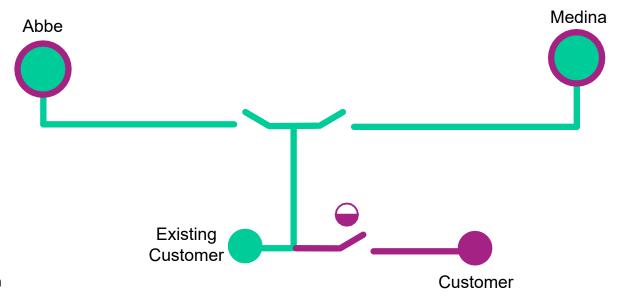
Alternatives Considered:

■ No other reasonable alternatives due to the customers proximity to the Abbe — Medina 69 kV Line.

Estimated Project Cost: \$0.2M

Projected In-Service: 8/29/2025
Status: Engineering

Model: 2023 RTEP model for the 2028 Summer (50/50)



Legend	
500 kV	
345 kV	
138 kV	
69 kV	
34.5 kV	
23 kV	
New	

Appendix

High Level M-3 Meeting Schedule

Activity	Timing
Posting of TO Assumptions Meeting information	20 days before Assumptions Meeting
Stakeholder comments	10 days after Assumptions Meeting

Needs

Activity	Timing
TOs and Stakeholders Post Needs Meeting slides	10 days before Needs Meeting
Stakeholder comments	10 days after Needs Meeting

Solutions

Activity	Timing
TOs and Stakeholders Post Solutions Meeting slides	10 days before Solutions Meeting
Stakeholder comments	10 days after Solutions Meeting

Submission of Supplemental Projects & Local Plan

Activity	Timing
Do No Harm (DNH) analysis for selected solution	Prior to posting selected solution
Post selected solution(s)	Following completion of DNH analysis
Stakeholder comments	10 days prior to Local Plan Submission for integration into RTEP
Local Plan submitted to PJM for integration into RTEP	Following review and consideration of comments received after posting of selected solutions

Revision History

6/4/2024 – V1 – Original version posted to pjm.com

6/5/2024— V2 — Updated with Maps

6/7/2024 – V3 – Added map for ATSI-2024-037