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Duquesne Light
Our Energy...Your Power

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May 1, 2015

Ms. Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, Pennsylvania 17105-3265

Re: Duquesne Light Company
Quarterly Electric Reliability Report – 1Q 2015

Dear Secretary Chiavetta:

Enclosed for filing, please find Duquesne Light Company's ("Duquesne Light") First Quarter 2015 Quarterly Electric Reliability Report.

Duquesne Light is submitting a confidential version and non-confidential version. The confidential version includes all information required by 52 Pa. Code § 57.195, is marked "confidential and proprietary" and is enclosed in a sealed envelope. The non-confidential version contains all required information except that the information contained within subsection (e)(10) of the report has been redacted. Duquesne Light Company respectfully requests the confidential version of Duquesne Light Company's Electric Reliability Report not be made available to the public.

Under 52 Pa. Code § 57.198(1), electric distribution companies may request revisions to their Inspection and Maintenance Plan by submitting an Addendum to their quarterly reliability reports that describes the proposed revisions to the Plan and provides a discussion of the reasons for the revisions. Consistent with 52 Pa. Code § 57.198(1), Duquesne Light is submitting an Addendum to this quarterly reliability report that contains a statement explaining the reasons for the revisions.

If you have any questions regarding the information contained in this filing, please feel free to contact me or Ribeka Garrity at 412-393-6099 or rgarrity@duqlight.com.

Sincerely,

Tishekia E. Williams
Senior Counsel, Regulatory

Enclosures

cc: Bureau of Technical Utility Services (Non-confidential Version)
Office of Consumer Advocate (Non-confidential Version)
Office of Small Business Advocate (Non-confidential Version)

Duquesne Light
Our Energy...Your Power

Duquesne Light Company

First Quarter 2015

Electric Reliability Report

to the

Pennsylvania Public Utility Commission

May 1, 2015

DUQUESNE LIGHT COMPANY
First Quarter 2015 – Electric Reliability Report

Filed May 1, 2015

57.195 Reporting Requirements

(d)(2) The name, title, telephone number and e-mail address of the persons who have knowledge of the matters, and can respond to inquiries.

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(e)(1) A description of each major event that occurred during the preceding quarter, including the time and duration of the event, the number of customers affected, the cause of the event and any modified procedures adopted in order to avoid or minimize the impact of similar events in the future.

No major events occurred during the first quarter of 2015.

(e)(2) **Rolling 12-month reliability index values (SAIFI, CAIDI, SAIDI, and if available, MAIFI) for the electric distribution company's service territory for the preceding quarter. The report shall include the data used in calculating the indices, namely the average number of customers served, the number of sustained customer interruptions, the number of customers affected, and the customer minutes of interruption. If MAIFI values are provided, the report shall also include the number of customer momentary interruptions.**

RELIABILITY BENCHMARKS AND STANDARDS

Duquesne Light Company

System Performance Measures with Major Events Excluded

Entire System				
	SAIDI	***SAIFI***	***CAIDI***	***MAIFI***
Benchmark	126	1.17	108	*
12 Month Standard	182	1.40	130	*
2015 1Q (Rolling 12 mo)	**60**	**0.58**	**103**	*

* Sufficient information to calculate MAIFI is unavailable.

Formulas used in calculating the indices

$$SAIFI = \frac{\text{(Total KVA interrupted) - (KVA impact of major events)}}{\text{System Connected KVA}}$$

$$SAIDI = \frac{\text{(Total KVA-minutes interrupted) - (KVA-minute impact of major events)}}{\text{System Connected KVA}}$$

CAIDI = SAIDI/SAIFI

Data used in calculating the indices

Total KVA Interrupted for the Period	4,189,551 KVA
Total KVA-Minutes Interrupted:	432,738,274 KVA-Minutes
System Connected Load as of 3/31/15:	7,186,118 KVA

(e)(3) Rolling 12-month reliability index values (SAIFI, CAIDI, SAIDI, and if available, MAIFI) and other pertinent information such as customers served, number of interruptions, customer minutes interrupted, number of lockouts, and so forth, for the worst performing 5% of the circuits in the system. An explanation of how the electric distribution company defines its worst performing circuits shall be included.

Circuits are evaluated based on a rolling twelve-month count of lockouts of protective devices (circuit breakers, sectionalizers and line reclosers). Circuits that experience four or more lockouts for a device in each quarterly rolling twelve-month period are identified and reported. Customer surveys show a significant drop in satisfaction when customers experience four or more interruptions in a year, and that threshold was therefore used as a basis for this evaluation method.

The list is ranked first by the number of lockouts, with a secondary sort based on the date of the most recent outage. This places a higher priority on circuits in each group experiencing problems more recently. Circuits that have not seen recent outages fall to a lower priority within the group, but remain on the list for monitoring.

Circuits that appear on the list for more than a year are targeted for remediation based on a review of outage records for root cause problems, field evaluations, and engineering analysis. Project scopes developed as a result of this analysis will be incorporated into the company's Work Plan for engineering, design and construction.

At the end of each quarter all circuits are reviewed to verify that past remediation efforts are working and to look for new reliability issues that may be developing. Serious new reliability problems are addressed immediately without waiting additional periods to collect information.

This analysis method provides for timely review of circuit performance by in-house staff and it adapts to the dynamic nature of Duquesne's distribution system. The threshold of four lockouts may produce a result greater or less than 5% of the total circuits in Duquesne's system. Reports will be issued on all circuits that violate the four-lockout threshold, even if the total is greater than 5% of the number of circuits on the system. If there are less than 5% of the circuits that violate the four-lockout threshold, then circuits with three lockouts that had the highest KVA-Minutes of outage time during the evaluation period will be added to get the list to 5% of the total circuits in the system.

See Attachment A for table of circuit reliability values and Service Centers associated with each circuit.

(e)(4) Specific remedial efforts taken and planned for the worst performing 5% of the circuits as identified in paragraph (3).

First Quarter 2015 Rolling 12 Month Circuit Data

Rank	Circuit	Name	Service Center	Remedial Actions Planned or Taken
1	4478	Hiawatha	Preble	Five total outages: *First Quarter 2015 Outages:* • One outage was due to loss of supply when the sub-transmission circuit feeding through Hiawatha substation locked out. • One outage was due to contacting by terminal pole. Previous Outages: • Two outages occurred due to loss of supply when the sub-transmission circuit feeding through the substation locked out due to trees that fell across the primary conductors. • One outage due to a large tree fall-in. Remedial Actions: • *The company will install an IntelliRupter on the overhead* conductor side of the sub-transmission circuit feeding the substation to provide Auto Fault-Clearing functionality. This will lessen the impact of tree problems in this heavily wooded section of the circuit from causing outages to customers.
2	4285	Verona	Penn Hills	Five total outages: First Quarter 2015 Outages : • One outage due to a tree fall-in. Previous Outages: • Three outages were due to tree fall-ins. • One outage due to an insulator failure. Remedial Actions: • Within the first quarter of 2015, the Company installed an Auto Fault-Clearing IntelliRupter on the sub-transmission circuit feeding Verona Substation.
3	4283	Oakmont	Penn Hills	Five total outages: *First Quarter 2015 Outages :* • One outage occurred due to tree fall-in. Previous Outages: • Three outages were due to falling trees, two of them from trees being uprooted due to very wet conditions. • One outage was due to an insulator failure. Remedial Actions: • Vegetation Management proposed this circuit for scheduled maintenance in 2016.

Rank	Circuit	Name	Service Center	Remedial Actions Planned or Taken
4	4308	East End	Penn Hills	Four total outages: First Quarter 2015 Outages : • One outage occurred due to a cable failure near the end of the circuit that locked out the substation breaker. The *circuit was out for 52 minutes while crews rerouted power* through a newly installed tie switch and aerial cable that was installed last year for this purpose. A few customers were out much longer while the actual cable failure was *repaired.* Previous Outages: • Two outages occurred which locked out the substation breaker. The first outage was attributed to a breaker mis-operation and the other outage was due to a storm. • One outage was due to a cable failure which occurred on the circuit and locked out the substation breaker. Remedial Actions: • *Because this circuit is all underground, even with the newly* installed tie at the end of the circuit, there is still limited flexibility with how customer load blocks can be switched around when rerouting power. The Company will *investigate installing sectionalizing underground switches* to provide the capability to reroute more customers from the new tie at the end of the circuit.
5	23890	Carrick	Preble	Four total outages: First Quarter 2015 Outages : • One breaker outage occurred when a conductor from a sub-transmission circuit above fell into the Carrick distribution feeder locking out the substation breaker. Previous Outages: • Two outages occurred when a large tree fell into the feeder locking out the substation breaker. • One outage occurred when primary phases on the main feeder wrapped together locking out the substation breaker. Remedial Actions: • The two tree-related outages occurred in an area that has stability issues with the hillside above. The unstable hillside can cause tree-related problems for the circuit feeder below. In 2015, the company will install an IntelliRupter on each end the feeder where it passes through this area so any future problem can be isolated without causing outages to customers.

Rank	Circuit	Name	Service Center	Remedial Actions Planned or Taken
6	4237	West End	Preble	Four total outages: First Quarter 2015 Outages : • No new breaker outages occurred on this circuit. Previous Outages: • One outage due to a vehicle accident caused primary phases to wrap together locking out the breaker. • One outage due to unstable ground conditions caused a tree to fall into the circuit. • One outage due to a storm which locked out the circuit. • One outage due to a tree fall-in. Remedial Actions: • Vegetation Management worked this entire circuit as part of its scheduled maintenance program in 2014. Reliability has improved but the company is continuing to monitor.
7	23770	Traverse Run	Raccoon	*Four total outages:* First Quarter 2015 Outages: • No new outages occurred on this circuit. *Previous Outages:* • Two outages were due to a tree fall-in. • Two outages were storm-related. Remedial Actions: • Vegetation Management proposed this circuit for scheduled maintenance in 2016.
8	23661	Crescent	Raccoon	Four total outages: First Quarter 2015 Outages: • No new outages occurred on this Recloser. Previous Outages in 2014: • One outage was due to contractor work. • The cause of one outage was unknown. • One outage occurred due to a storm. • One outage occurred due to a tree fall-in. Remedial Actions: • Vegetation Management is presently performing scheduled maintenance on this circuit in 2015 and reliability has improved as seen in the first quarter performance results. The company will continue to monitor this circuit to verify that all reliability issues have been resolved.

Rank	Circuit	Name	Service Center	Remedial Actions Planned or Taken
9	4420	Mt. Pleasant	Preble	Four total outages: First Quarter 2015 Outages: • No new breaker outages occurred on this circuit. Previous Outages: • Three outages occurred due to tree fall-ins. • One outage occurred due to a storm. Remedial Actions: • Vegetation Management worked this entire circuit as part of its scheduled maintenance program in 2014.
10	4852	Conway	Raccoon	Four total outages: First Quarter 2015 Outages: • No new outages occurred on this circuit Previous Outages: • Two outages were storm-related. • Two outages were due to tree fall-ins. Remedial Actions: • The supervisor reviewed this circuit during the fourth quarter of 2014. All problems identified were corrected. • The circuit scheduled vegetation maintenance was completed during the fourth quarter of 2014.
11	23695	Brunot Is.	Preble	Four total outages: First Quarter 2015 Outages: • No new outages occurred. Previous Outages: • Three outages occurred due to tree fall-ins. • One outage occurred due to a storm. Remedial Actions: • The circuit was converted to pulse-reclosing in September 2014 which is expected to improve fault protection and reduce breaker lockouts. • Vegetation Management worked this entire circuit as part of its 2014 scheduled maintenance program. Hazard tree mitigation to be performed in 2015.
12	23701	North	Edison	Three total outages: First Quarter 2015 Outages: • No new outages occurred on this circuit. Previous Outages: • One outage was due to loss of supply. • One outage was due to tree a fall-in. • One outage was due to equipment failure. Remedial Actions: • Vegetation Management proposed this circuit for scheduled maintenance in 2016.

Rank	Circuit	Name	Service Center	Remedial Actions Planned or Taken
13	23706	North	Edison	Three total outages: First Quarter 2015 Outages: • No new outages occurred on this circuit. Previous Outages: • One outage was due to a tree fall-in. • The cause of one outage was unknown. • One outage was due to a contractor contacting equipment. Remedial Actions: • Vegetation Management worked this entire circuit as part of scheduled maintenance in 2014.
14	23869	Wildwood	Edison	Three total outages: First Quarter 2015 Outages: • No new outages occurred on this circuit Previous Outages: • One outage was due to a contractor contacting equipment. • The cause of one outage was unknown. • One outage was due to a tree fall-in. Remedial Actions: • Vegetation Management proposes this circuit for scheduled maintenance in 2016.
15	23675	Montour	Preble	Three total outages: First Quarter 2015 Outages: • No new outages occurred on this circuit. Previous Outages: • One outage was due to a tree fall-in. • Two outages were to due equipment failures. Remedial Actions: • Vegetation Management is presently working this entire circuit as part of its scheduled maintenance program for 2015.
16	23698	Brunot Is.	Preble	Three total outages: First Quarter 2015 Outages: • No new outages occurred on this circuit. Previous Outages: • One outage was due to an insulator failure. • Two outages were due to storms. Remedial Actions: • Vegetation Management completed scheduled maintenance on this circuit in the second quarter of 2014.

Rank	Circuit	Name	Service Center	Remedial Actions Planned or Taken
17	23681	Woodville	Preble	Three total outages: First Quarter 2015 Outages: • No new outages occurred on this circuit. Previous Outages: • Two outages were tree-related. • The cause of one outage was unknown. Remedial Actions: • Vegetation Management re-inspected the area of the circuit that had outages and corrected the identified problems during the third quarter of 2014. • Pulse-reclosing was implemented on part of the circuit which will improve fault protection and reduce coordination problems in the future.
18	23710	Pine Creek	Edison	Three total outages: First Quarter 2015 Outages: • No new outages occurred on this circuit. Previous Outages: • One outage was due to a tree fall-in. • One outage was due to balloon release. • One outage was due to a broken pole. Remedial Action: • The Company converted this circuit to pulse-reclosing operation in the fourth quarter of 2014.
19	4382	Crafton	Preble	Three total outages: First Quarter 2015 Outages: • No new outages occurred on this circuit. Previous Outages: • One outage was due to high current • One outage occurred during a storm. • One outage was a tree growth- related problem. Remedial Actions: • Since the identified offending trees were trimmed, no additional problems have occurred.
20	23713	Pine Creek	Edison	Three total outages: First Quarter 2015 Outages: • No new outages occurred on this circuit. Previous Outages: • One outage was tree-related due to a falling branch. • One outage was due to an insulator failure. • One outage was due to loss of supply Remedial Actions: • This circuit was converted to all pulse-reclosing operation during the fourth quarter of 2014. Reliability has continued to improve.

Rank	Circuit	Name	Service Center	Remedial Actions Planned or Taken
21	4622	Ardmore	Penn Hills	Three total outages: First Quarter 2015 Outages: • No new outages occurred on this circuit. Previous Outages: • Three outages were tree-related. . Remedial Actions: • The Company added Auto-Fault Clearing functionality to the sub-transmission circuit that feeds Ardmore to prevent Loss of Supply outages. • The company's Asset Management Department continues to evaluate various redesigns or rebuild options for Ardmore Substation to enhance customer reliability.

(e)(5) A rolling 12-month breakdown and analysis of outage causes during the preceding quarter, including the number and percentage of service outages, the number of customers interrupted, and customer interruption minutes categorized by outage cause such as equipment failure, animal contact, tree related, and so forth. Proposed solutions to identified service problems shall be reported.

April 1, 2014 through March 31, 2015 – No PUC Major Event Exclusions

CAUSE	NO. OF OUTAGES	OUTAGE PERCENTAGE	KVA TOTAL	KVA PERCENTAGE	KVA-MINUTE TOTAL	KVA-MINUTE PERCENTAGE
Storms	321	13%	547,487	13%	66,819,730	15%
Trees (Contact)	26	1%	22,291	1%	1,422,129	1%
Trees (Falling)	610	24%	860,706	21%	128,418,223	29%
Equipment Failures	772	30%	1,465,662	35%	133,565,412	31%
Overloads	106	4%	91,449	2%	5,463,342	1%
Vehicles	140	5%	314,106	7%	37,646,401	9%
Other	600	23%	887,850	21%	54,403,037	14%
TOTALS	2,575	100%	4,189,551	100%	432,738,274	100%

(e)(6) Quarterly and year-to-date information on progress toward meeting transmission and distribution inspection and maintenance goals/ objectives.

2015 Transmission and Distribution Goals and Objectives

Program Project	Unit of Measurement	Target for 2015 1Q	Actual for 2015 1Q	Percent Complete	Target for 2015	Actual YTD for 2015
Communications Goals						
Communication Battery Maintenance	Batteries	24	24	100%	96	24
Overhead Distribution Goals						
Recloser Inspections	Circuits	33	28	85%	130	28
Pole Inspections	Poles	0	0	N/A	17,945	0
OH Line Inspections	Circuits	33	28	85%	130	28
OH Transformer Inspections	Circuits	33	28	85%	130	28
Padmount & Below Grade Inspections	Circuits	21	50	238%	81	50
Overhead Transmission Goals						
Helicopter Inspections	Number of Structures	0	0	N/A	500	0
Ground Inspections	Number of Structures	0	0	N/A	350	0
Substations Goals						
Circuit Breaker Maintenance	Breakers	155	136	88%	725	136
Station Transformer Maintenance	Transformers	6	8	133%	67	8
Station Battery Maintenance	Batteries	244	240	98%	968	240
Station Relay Maintenance	Relays	75	55	73%	615	55
Station Inspections	Sites	519	519	100%	2,067	519
Underground Distribution Goals						
Manhole Inspections	Manholes	375	46	12%	700	46
Major Network Inspection (Prot Relay)	Network Protectors	27	16	59%	92	16
Minor Network Visual Inspection (Transformer/Protector/Vault)	Network Transformers	165	200	121%	573	200
Underground Transmission Goals						
Pressurization and Cathodic Protection Plant Inspection	Work Packages	13	13	100%	52	13
Vegetation Management Goals						
Overhead Line Clearance	Circuit Overhead Miles	375	479	128%	1,300	479

(e)(7) Quarterly and year-to-date information on budgeted versus actual transmission and distribution operation and maintenance expenditures in total and detailed by the EDC's own functional account code or FERC account code as available.

For the Three Months Ended March 31, 2015 (Quarter-to-date)
Favorable/ (Unfavorable)

	Customer Care	External Affairs	Human Resources	Operations/ Operation Services	Technology	General Corporate*	Total
Total Actual	12,961,176	1,076,816	3,811,880	16,306,059	16,785,528	12,610,577	63,552,036
Total Budget	13,133,632	991,838	3,651,386	16,381,704	11,933,484	11,510,488	57,602,532
Variance	172,456	(84,978)	(160,494)	75,645	(4,852,044)	(1,100,089)	(5,949,504)

*Includes Finance, Office of General Counsel and Senior Management Costs

(e)(8) Quarterly and year-to-date information on budgeted versus actual transmission and distribution capital expenditures in total and detailed by the EDC's own functional account code or FERC account code as available.

For the Three Months Ended March 31, 2015 (Quarter-to-date)
Favorable/ (Unfavorable)

	Customer Care	External Affairs	Human Resources	Operations/ Operations Services	Technology	General Corporate*	Total
Total Actual	716,384	4,246	2,469,678	18,796,659	15,273,933	6,960,943	44,221,843
Total Budget	958,801	0	2,572,333	34,429,655	17,798,446	7,611,481	63,370,716
Variance	242,417	(4,246)	102,655	15,632,996	2,524,513	650,538	19,148,873

Includes Finance, Office of General Counsel and Senior Management Costs

(e)(9) Dedicated staffing levels for transmission and distribution operation and maintenance at the end of the quarter, in total and by specific category (e.g. linemen, technician, and electrician).

Telecom	Electronic Technician	7
	Sr. Electronic Tech	10
	Apprentice Splicer/Trouble Tec	3
	Telecom Splicer/Trouble	3
	Total	**23**
Substation	Electrical Equipment Tech	14
	Protection & Control Tech	23
	Sr. Elec. Equipment Tech	10
	Rigger Specialist	3
	Rigger Crew Leader	2
	Shop Mechanic 2 Rigger	0
	Yard Group Leader	3
	Total	**55**
Underground	Apprentice UG Splicer	14
	UG Inspector	9
	Journey UG Splicer	16
	Sr. UG Splicer	6
	UG Cable Tester/Installer	1
	Sr. UG Mechanic	0
	Network Operator	10
	Total	**56**
Overhead	Apprentice T&D	66
	Equipment Attendant	1
	Equipment Material Handler	6
	Field Inspector	0
	Journey Lineworker	81
	Restricted HS Lineworker	17
	Service Crew Leader	1
	Sr. Lineworker	48
	Distribution Tech	8
	Total	**228**
Street Light Changers	**Total**	**6**
Mobile Worker	**Total**	**2**

(e)(9) (Continued)

Engineering	Drafter	0
	General Clerk - Grad	13
	General Technician	0
	GIS Technician	3
	Head File Record Clerk	1
	Survey Instrument	3
	Right of Way Agent A	4
	Sr. Technician	10
	T&D Mobile Worker	8
	Technician A	4
	Technician B	4
	Technician C	7
	Test Technician, Mobile	5
	Total	**62**
Service Center Technician	Sr. Technician	7
	Technician	0
	Total	**7**
Traveling Operator/Troubleshooter	Senior Operator	28
	Traveling Operator	4
	Troubleshooter 1/C	6
	Troubleshooter	7
	Total	**45**
Load Dispatcher	**Total**	**11**
Meter Technician	Meter Technician	8
	Sr. Meter Technician	21
	Total	**29**
Meter Reader	**Total**	**16**
Customer Service Representatives	Autodialing Operator	8
	Customer Service Rep	103
	Customer Service Rep PT	25
	Word Processing Clerk	1
	Sr. Customer Service	5
	Total	**142**
Administrative/ Supervisory/Management	**Total**	**406**
	TOTAL	**1,088**

(e)(10) **Quarterly and year-to-date information on contractor hours and dollars for transmission and distribution operation and maintenance.**

CONFIDENTIAL INFORMATION HAS BEEN REDACTED

(e)(11) **Monthly call-out acceptance rate for transmission and distribution maintenance workers presented in terms of both the percentage of accepted call-outs and the amount of time it takes the EDC to obtain the necessary personnel. A brief description of the EDC's call-out procedure should be included when appropriate.**

Call-Out Acceptance Rate – 1st Quarter 2015

Month	Accepts	Refusals	Total	Percentage
January	226	206	432	52%
February	199	211	410	49%
March	220	224	444	50%

Amount of Time it Takes to Obtain the Necessary Personnel – 1st Quarter 2015

Month	Total Callout Events	Necessary Personnel Accepting	Average Minutes:Seconds per Callout Event	Average Minutes:Seconds per Individual called
January	94	229	3:19	1:16
February	66	200	4:14	1:20
March	81	223	3:30	1:17
2015 YTD	241	652	3:38	1:17

ATTACHMENT A

(e)(3) **Rolling 12-month reliability index values (SAIFI, CAIDI, SAIDI, and if available, MAIFI) and other pertinent information such as customers served, number of interruptions, customer minutes interrupted, number of lockouts, and so forth, for the worst performing 5% of the circuits in the system.**

Circuit	Name	Service Center	Device	Lockouts	Connected KVA	Last Outage	Total KVA-Minutes	Total KVA Interrupted	SAIDI	SAIFI	CAIDI
4478	Hiawatha	Preble	Loss of supply	5	5,684	03/18/15	676,396	22,736	119	4.00	30
4285	Verona	Penn Hills	BKR + Loss of Supply	5	2,746	02/03/15	642,564	13,730	234	5.00	47
4283	Oakmont	Penn Hills	BKR + Loss of Supply	5	2,679	02/03/15	626,886	13,395	234	5.00	47
4308	East End	Penn Hills	BKR	4	2,236	03/20/15	1,918,859	10,307	858	4.61	186
23890	Carrick	Preble	BKR	4	24,616	02/02/15	3,450,071	21,893	140	0.89	158
4237	West End	Preble	BKR	4	3,294	12/15/14	725,390	13,276	220	4.03	55
23770	Traverse Run	Raccoon	WR590	4	19,469	12/06/14	9,459,515	66,727	486	3.43	142
23661	Crescent	Raccoon	R100	4	27,415	12/22/14	3,456,863	17,272	126	0.63	200
4420	Mt. Pleasant	Preble	BKR	4	2,261	11/24/14	1,909,791	10,499	845	4.64	182
4852	Conway	Raccoon	BKR + Loss of Supply	4	1,754	11/24/14	1,279,003	9,657	729	5.51	132
23695	Brunot Is.	Preble	EA301	4	23,890	08/26/14	4,216,492	48,080	176	2.01	88
23701	North	Edison	BKR	3	16,740	11/21/14	5,341,510	84,450	319	5.04	63
23706	North	Edison	WA832	3	21,782	11/29/14	3,252,588	13,237	149	0.61	246
23869	Wildwood	Edison	R100	3	18,745	12/24/14	6,198,748	42,131	331	2.25	147
23675	Montour	Preble	BKR	3	24,286	12/05/14	3,414,195	38,204	141	1.57	89

Circuit	Name	Service Center	Device	Lockouts	Connected KVA	Last Outage	Total KVA-Minutes	Total KVA Interrupted	SAIDI	SAIFI	CAIDI
23698	Brunot Is.	Preble	WA209	3	21,983	12/01/14	4,056,240	39,179	185	1.78	104
23681	Woodville	Preble	ER198/EA259	3	30,731	11/24/14	6,678,070	42,072	217	1.37	159
23710	Pine Creek	Edison	WR383	3	32,810	11/24/14	4,940,947	36,042	151	1.10	137
4382	Crafton	Preble	R140	3	3,719	07/01/14	461,251	3,333	124	0.90	138
23713	Pine Creek	Edison	WA446	3	27,660	06/19/14	6,929,247	26,814	251	0.97	258
4622	Ardmore	Penn Hills	BKR + Loss of Supply	3	3,641	05/27/14	55,790	3,666	15	1.01	15

DUQUESNE LIGHT COMPANY REASONS FOR MODIFYING ITS BIENNIAL INSPECTION, MAINTENANCE, REPAIR AND REPLACEMENT PLAN AND ALTERNATIVE REQUEST FOR WAIVER IF THE REVISIONS ARE NOT APPROVED

I. INTRODUCTION

Pursuant to 52 Pa. Code § 57.198(l), Duquesne Light Company ("Duquesne Light" or the "Company") requests that the Pennsylvania Public Utility Commission ("Commission") approve revisions to the Company's Biennial Inspection, Maintenance, Repair and Replacement Plan ("Inspection and Maintenance Plan" or "Plan"). Under 52 Pa. Code § 57.198(l), if an electric distribution company ("EDC") seeks to amend its Inspection and Maintenance Plan, the EDC is required to submit an Addendum to its quarterly reliability report which contains the revisions to the EDC's Inspection and Maintenance Plan, along with an explanation of the reasons for the revisions. Below, Duquesne Light explains the revisions to its current Plan and the reasons why such revisions are appropriate.

II. PROPOSED REVISIONS

The Company proposes three revisions to its Inspection and Maintenance Plan. The proposed revisions relate to the Company's inspection benchmarks.[1] The Company proposes to revise the number of planned substation inspections due to decreases in substation assets.[2] The Company also proposes to revise the pole inspections numbers as the number of poles has increased. Finally, the Company proposes to reduce the number of circuits referenced in the Plan as a result of a decrease in the number of circuits. The original targets and proposed revisions are shown below.

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[1] The inspection benchmarks affected are (1) pole inspections, by number of poles; (2) distribution overhead line inspection, by number of circuits; (3) distribution transformer inspections, by number of circuits; (4) recloser inspections, by number of circuits; and (5) substation inspections, by number of substations.

[2] The Company has modified both the 2014 and 2015 inspection numbers.

Pole Inspections – As Originally Filed

Inspection Plan	**Pole Inspections Planned** *(Number of Poles)*	
	2014	**2015**
Duquesne Light Company *Total Number of Poles is 215,257*	17,689	17,689

Pole Inspections – Revised

Inspection Plan	**Pole Inspections Planned** *(Number of Poles)*	
	2014	**2015**
Duquesne Light Company *Total Number of Poles is 215,351(2015)*	17,689	17,945

Distribution Overhead Line Inspections – As Originally Filed

Inspection Plan	**Overhead Line Inspections Planned** *(Number of Circuits)*	
	2014	**2015**
Duquesne Light Company *Total Circuits (650)*	133	133

Distribution Overhead Line Inspections – Revised

Inspection Plan	**Overhead Line Inspections Planned** *(Number of Circuits)*	
	2014	**2015**
Duquesne Light Company *Total Circuits (647) (2015)*	133	130

Distribution Transformer Inspections – As Originally Filed

Inspection Plan	Type	Transformer Inspections Planned by Circuit *(Number of Circuits inspected)*	
		2014	**2015**
Duquesne Light Company *Total Circuits (650)*	Overhead Transformers (5-year cycle by circuit)	133	133
	Pad-mounted and Below-Ground Transformers (8-Year Cycle by circuit)	83	83

Distribution Transformer Inspections – Revised

Inspection Plan	Type	Transformer Inspections Planned by Circuit *(Number of Circuits inspected)*	
		2014	**2015**
Duquesne Light Company *Total Circuits (647) (2015)*	Overhead Transformers (5-year cycle by circuit)	133	130
	Pad-mounted and Below-Ground Transformers (8-Year Cycle by circuit)	83	81

Recloser Inspections – As Originally Filed

Inspection Plan	Recloser Inspections Planned *(Number of Circuits)*	
	2014	**2015**
Duquesne Light Company *Total Circuits (650)*	133	133

Recloser Inspections – Revised

Inspection Plan	Recloser Inspections Planned *(Number of Circuits)*	
	2014	**2015**
Duquesne Light Company *Total Circuits (647) (2015)*	133	130

Substation Inspections – As Originally Filed

Inspection Plan	**Substation Inspections Planned** *(Number of Company Stations) (x 12 times annually)*	
	2014	**2015**
Duquesne Light Company *Total Stations (175)*	175	175

Substation Inspections – Revised

Inspection Plan	**Substation Inspections Planned** *(Number of Company Stations) (x 12 times annually)*	
	2014	**2015**
Duquesne Light Company *Total Stations (172) (2015)*	173	172

In summary, the Company's proposed revisions to its 2014-2015 Inspection and Maintenance Plan should be approved because they are based upon changes in the Company's assets and not a change in its inspection practices. In addition, the justifications included in the 2014-2015 Plan remain the same since the Company is not changing its inspection practices. Thus, the Company requests approval to modify its 2014-2015 Plan and for the Commission to maintain the waivers in connection with such Plan.

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