|  |  |  |
| --- | --- | --- |
| PUC logo | COMMONWEALTH OF PENNSYLVANIA  PENNSYLVANIA PUBLIC UTILITY COMMISSION  400 NORTH STREET, HARRISBURG, PA 17120 | **IN REPLY PLEASE REFER TO OUR FILE** |

August 11, 2016

Docket No.: P-2016-2540046

TISHEKIA E. WILLIAMS, ATTORNEY

DUQUESNE LIGHT COMPANY

411 SEVENTH AVENUE

16TH FLOOR

PITTSBURGH, PA 15219

RE: Duquesne Light Company’s Long Term Infrastructure Improvement Plan TUS 2 Data Request

Dear Ms. Williams:

The Duquesne Light Company (Duquesne) filed a Petition seeking approval of its Long Term Infrastructure Improvement Plan (LTIIP) on April 15, 2016. The Commission’s Bureau of Technical Utility Services (TUS) issued a data request, via Commission Secretarial Letter, on July 13, 2016. Duquesne responded to TUS’ data request on July 25, 2016.

An LTIIP must demonstrate how it will accelerate or maintain an accelerated rate of infrastructure repair, improvement or replacement as per 52 Pa. Code § 121.4(e)(2). More information is needed to determine how the total amounts of projects and expenditures in Duquesne’s LTIIP represent acceleration over the projected baseline.

Please refer to Attachment 1, Data Request TUS 2, for additional information the Commission requests to properly evaluate and approve the Duquesne LTIIP.

Please forward the information to the Secretary of the Commission at the address listed below **within ten (10) days** from the date of this letter. Make sure to reference the Docket Number listed above when filing your response. Please note that some responses may be e-filed to your case, <http://www.puc.pa.gov/efiling/default.aspx>. A list of document types allowed to be e-filed can be found at <http://www.puc.pa.gov/efiling/DocTypes.aspx>.

Rosemary Chiavetta, Secretary

Pennsylvania Public Utility Commission

400 North Street

Harrisburg, PA 17120

**Your answers should be verified per 52 Pa Code § 1.36.** Accordingly, you must provide the following statement with your responses:

I, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter.  I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

The blank should be filled in with the name of the appropriate company representative, and the signature of that representative should follow the statement.

Please direct any questions to David Washko, Bureau of Technical Utility Services, at dawashko@pa.gov or (717) 425-7401.



Sincerely,

Rosemary Chiavetta

Secretary

Enclosure: Attachment No. 1, Data Request TUS-2

cc: Daniel Searfoorce- TUS Reliability and Emergency Preparedness Supervisor

David Washko- TUS Electric Reliability Engineer

**Attachment 1**

**Data Request TUS-2**

Docket No. P-2016-2540046

Duquesne Light Company

1. Reference Duquesne’s reply to Data Request TUS-1, filed July 25, 2016. Specifically reference the responses to TUS DR-3 and TUS DR-4 items.
   1. Duquesne Tables 3a, 3b1, and 3b2 have categories labeled “Overhead Program”. It appears this category is incorrectly described as “Overhead Program” versus “Substation Program.” Confirm which description is correct. Also define “subm. Trmr.” referenced in Unit column.
   2. Total overall baseline budget decreased from $507.9 million (2011-2016) to $439 million (2017-2022). There appear to be significant reductions in overall baseline expenditures (exclusive of any LTIIP expenditures) for the Underground program and Substation program for the years 2017 to 2022 as compared to the historical expenditures from 2011 to 2016. Explain in detail the reasons for the reductions in expenditures for baseline expenditures for these categories and overall total expenditures.
   3. There appear to be significant reductions in the overall baseline for Underground Residential Distribution Rehabilitation programs and initiatives (Table 3b2 as compared to Table 3b1). Explain in detail the basis for this significant reduction.
   4. The number of baseline Breaker & Switch Replacements appear to significantly increase, refer to Table 3a, 3b2, and 3b1. Projected baseline breaker replacements increased from 38 breakers in 2011-2016 to 64 breakers in 2017-2022 and LTIIP acceleration of 125; yet expenditures decreased significantly from $73.8 million, $42.5 million, and $15 million respectively as indicated on TUS DR-4 response. Explain in detail this apparent anomaly cost savings.
   5. Refer to Table 3a, 3b2, and 3b. The 4 kV program in 2011 – 2016 eliminated 6 substations, upgraded 13 stepdown conversions, and added 4 modular integrated transformer systems for a total cost of $23 million; while in 2017-2022 projections merely upgraded only 6 stepdown conversions for a total cost of $25 million. Please explain this significant cost increase relative to 2011-2016.
   6. Please further breakdown the program costs shown in TUS DR-4 response by categories as was done in the Duquesne LTIIP Petition Table 12, page 32.
   7. Refer to Table 3a, 3b2, and 3b; TUS DR-4 response; and Duquesne LTIIP Petition Table 12, page 32. The Aerial Cable Replacement costs vary from $25 million/mile during 2011-2016, to $28 million/mile in 2017-2022, and then $19 million/mile for LTIIP acceleration. Please explain in detail the basis for these significant cost variations.