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Anthony D. Kanagy

akanagy@postschell.com 717-612-6034 Direct 717-720-5387 Direct Fax File #: 166407

March 15, 2019

VIA HAND DELIVERY

Rosemary Chiavetta, Secretary Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, 2nd Floor North P.O. Box 3265 Harrisburg, PA 17105-3265

Re: Application of Duquesne Light Company filed Pursuant to 15 Pa.C.S. §1511(c) for a Finding and Determination that the Service to be Furnished by the Applicant through its Proposed Exercise of the Power of Eminent Domain to Acquire a Certain Portion of the Lands of George N. Schaefer in Moon Township, Allegheny County, Pennsylvania Associated with the 138 kV Transmission Lines Associated with the Brunot Island - Crescent Project Is Necessary or Proper for the Service, Accommodation, Convenience, or Safety of the Public Docket No. A-2019-

Dear Secretary Chiavetta:

Enclosed is the Application of Duquesne Light Company for the above-referenced proceeding. Also enclosed is the Direct Testimony of Lesley C. Gannon and supporting exhibits. A CD containing a copy of the Application, Direct Testimony and supporting exhibits is also enclosed. A check in the amount of \$350 is enclosed for payment of the filing fee. Copies will be provided as indicated on the certificate of service.

Respectfully submitted,

Anthony D. Kanagy

ADK/kls Enclosures

cc: Certificate of Service

RECEIVED

BEFORE THE 2019 MAR 15 AM 10: 59 PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Duquesne Light Company Under:
15 Pa.C.S. § 1511(c) For A Finding and:
Determination That the Service to be Furnished:
by the Applicant Through Its Proposed Exercise:
of the Power of Eminent Domain to Acquire a:
Certain Portion of the Lands of George N.:
Schaefer of Moon Township, Allegheny County,:
Pennsylvania for the Siting and Construction of:
Transmission Lines Associated with the Proposed:
Brunot Island – Crescent Project is Necessary or:
Proper for the Service, Accommodation,:
Convenience, or Safety of the Public:

PARTIE
SECRETION IS SHREAU
FROM DLCK

Docket No. A-2019-____

APPLICATION OF DUQUESNE LIGHT COMPANY

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Duquesne Light Company ("Duquesne Light" or the "Company") herein files this Application, pursuant to 15 Pa. C.S. § 1511(c), for a finding and determination by the Pennsylvania Public Utility Commission ("Commission") that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right-of-way and easement over a certain portion of the lands of George N. Schaefer in Moon Township, Allegheny County, Pennsylvania for the siting and construction of the 138 kV Transmission Lines Associated with the Brunot Island – Crescent Project ("BI – Crescent Project") is necessary or proper for the service, accommodation, convenience, or safety of the public. In support of this Application, Duquesne Light states as follows:

I. INTRODUCTION AND OVERVIEW

- 1. This Application is filed by Duquesne Light, a public utility that provides electric distribution, transmission, and provider of last resort services in Pennsylvania subject to the regulatory jurisdiction of the Commission.
 - 2. Duquesne Light's principal business address is:

Duquesne Light Company 411 Seventh Avenue Pittsburgh, PA 15230

3. Duquesne Light's attorneys are:

Tishekia Williams (PA ID # 208997) Emily Farah (PA ID # 322559) Duquesne Light Company 411 Seventh Avenue Pittsburgh, PA 15230-1930

E-mail: twilliams@duqlight.com E-mail: efarah@duqlight.com Anthony D Kanagy (PA ID # 85522) Garrett P. Lent (PA ID # 321566) Post & Schell, P.C.

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Duquesne Light's attorneys are authorized to receive all notices and communications regarding this Application.

- 4. Duquesne Light is a Pennsylvania business corporation formed on November 25, 1912. Duquesne Light converted to a limited liability company on November 11, 2017; the conversion was approved by the Commission by Order entered August 31, 2017 at Docket No. A-2017-2599375. Duquesne Light is subject to the Pennsylvania Business Corporation Law of 1988, P.L. 1444, No. 177, Section 103, as amended, 15 Pa. C.S. §§ 1101 et seq. ("BCL").
- 5. Duquesne Light is also a Pennsylvania public utility and has the power of eminent domain pursuant to the Pennsylvania BCL. Duquesne Light submits this Application pursuant to Section 1511 of the BCL, 15 Pa. C.S. § 1511.

- 6. Duquesne Light furnishes electric service to approximately 596,000 customers throughout its certificated service territory, which includes all or portions of Allegheny and Beaver Counties and encompasses approximately 800 square miles in western Pennsylvania.
- 7. Upon Commission approval, Duquesne Light proposes to construct the BI Crescent Project. The BI Crescent Project involves, among other things, the reconstruction of approximately 14.5 miles of overhead 138 kV transmission lines between the Brunot Island and the Crescent Substation. The reconstruction of the 138 kV transmission lines as a part of BI Crescent Project is needed to replace some of the oldest infrastructure in Duquesne Light's service territory, and to continue to provide safe and reliable service to customers.
- 8. A certain portion of the route selected for the BI Crescent Project will traverse a portion of the land owned by George N. Schaefer in Moon Township, Allegheny County, Pennsylvania. By this Application, Duquesne Light is requesting a finding and determination that the service to be furnished through its proposed exercise of the power of eminent domain to acquire a right of way and easement over a certain portion of the Schaefer property for the construction of the transmission lines associated with the BI Crescent Project is necessary or proper for the service, accommodation, convenience, or safety of the public.
- 9. On March 15, 2019, Duquesne Light filed the "Application of Duquesne Light Company filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for Approval of the Siting and Construction of the 138 kV Transmission Lines Associated with the Brunot Island Crescent Project in the City of Pittsburgh, McKees Rocks Borough, Kennedy Township, Robinson Township, Moon Township, and Crescent Township, Allegheny County, Pennsylvania" (the "BI Crescent Siting Application"). Therein, Duquesne Light is requesting

Commission approval of the siting and construction of the BI – Crescent Project in Allegheny County, Pennsylvania.

10. A complete copy of the BI – Crescent Siting Application, together with the supporting Attachments and Testimony, is being served on George N. Schaefer. The BI – Crescent Siting Application and supporting Attachments and Testimonies are incorporated herein by reference.

II. NEED FOR THE PROJECT

- 11. System planning is the process which assures that transmission and distribution systems can supply electricity to all customer loads reliably and economically. The reliable and economical operation of transmission systems requires planning guidelines for system expansion and reinforcement.
- 12. PJM Interconnection, LLC ("PJM") is a Federal Energy Regulatory Commission ("FERC") approved Regional Transmission Organization charged with ensuring the reliability of the electric transmission system under its functional control and coordinating the movement of electricity in all or parts of thirteen states and the District of Columbia, including most of Pennsylvania. Duquesne Light, an owner of transmission facilities in Pennsylvania, is a member of PJM and actively participates in the PJM transmission planning process.
- 13. In order to ensure reliable transmission service, PJM prepares an annual Regional Transmission Expansion Plan ("RTEP") to ensure power continues to flow reliably to customers. The North American Electric Reliability Corporation ("NERC"), PJM, and transmission owner reliability criteria are used by PJM and the transmission owners to analyze the system and determine if specific transmission upgrade projects are needed to ensure long-term reliable electric service to customers.

- 14. Duquesne Light has adopted reliability and planning standards to ensure adequate and appropriate levels of electric service to its customers consistent with good utility practice. The Duquesne Light Transmission Planning Criteria were developed from and are consistent with the NERC and PJM planning and reliability standards.¹
- Light's transmission system is planned so that it can be operated at all projected load levels and during normal scheduled outages to withstand specific unscheduled contingencies without exceeding the equipment capability, causing system instability or cascade tripping, or exceeding voltage tolerances. The transmission system is required to have adequate capability so that it can be operated normally and can withstand unscheduled contingencies and other system conditions.
- 16. The BI Crescent corridor has some of Duquesne Light's oldest in-service steel lattice towers. Duquesne Light has performed structural evaluations and determined that the structures are approaching end of useful life. These structural evaluations were performed by an engineering consultant with experience in transmission line design, modeling, and structural analysis. Based on current condition, structure deterioration, and Power Line Systems Computer Aided Design and Drafting ("PLS-CADD")² modeling at current design codes, all results indicate these structures are beyond permanent repair and require replacement. Temporary repairs have been made to ensure reliable service until new replacement structures can be installed.
- 17. While the primary driver for this project is to replace aging transmission system infrastructure, other benefits can be achieved by rebuilding this transmission corridor.

¹ Duquesne Light's reliability and planning standards are set forth in its Federal Energy Regulatory Commission Form No. 715 annual report.

² PLS-CADD is an industry-standard transmission line modeling software.

18. Transmission system studies have shown that during outages of various 345 kV circuits within the Duquesne Light service area, significant thermal and voltage concerns arise. Energizing one of the new BI – Crescent 138 kV circuits at 345 kV in the future would help to mitigate these issues.

III. DESCRIPTION OF THE PROJECT

- 19. To address the identified reliability and planning issues described above, Duquesne Light proposes to rebuild the BI Crescent double-circuit 138 kV Transmission Line. The proposed BI Crescent double-circuit 138 kV Transmission Line will extend approximately 14.5 miles between the Brunot Island Substation in the City of Pittsburgh and the Crescent Substation in Crescent Township.
- 20. The entire Project will be located in Allegheny County. Approximately 2.0 miles of the project will be located within the City of Pittsburgh, approximately 2.6 miles will be located within Kennedy Township, approximately 3.1 miles will be located within Robinson Township, approximately 5.0 miles will be located within Moon Township, and approximately 1.8 miles will be located within Crescent Township.
- 21. The proposed Project will replace aging transmission system infrastructure to meet safety and reliability standards. One circuit position on the transmission structures will be designed to 345 kV standards, but will be operated at 138 kV until load growth or system conditions require this voltage increase and necessary approvals are acquired. The other circuit position on the transmission structures will be designed to 138 kV standards and will be operated at 138 kV.
- 22. The proposed Project was reviewed by PJM stakeholders and included in PJM's TEAC as project s0320.

23. An aerial photograph map showing the location of the proposed BI – Crescent 138 kV Transmission Line is provided in this proceeding Duquesne Light Exhibit No. MH-1, which is attached to Duquesne Light Statement No. 1 (Schaefer).

IV. HEALTH AND SAFETY

- 24. The proposed Project will not create any unreasonable risk of danger to the public health or safety. The Project will be designed, constructed, operated, and maintained in a manner that meets or surpasses all applicable NESC minimum standards and all applicable legal requirements.
- 25. Descriptions of Duquesne Light's construction, operation, maintenance and safety standards and procedures for transmission and distribution lines meet or exceed all relevant NESC standards and all standards of the Federal Occupational Safety and Health Administration ("OSHA").
- 26. The BI Crescent Project is being completed primarily within an existing transmission line corridor. Duquesne Light will apply the Wire Zone/Border Zone management technique, which is recognized as an industry best practice to manage vegetation and ensure the safe and reliable delivery of electricity.
- 27. Duquesne Light performed an electromagnetic field study for the proposed transmission line. A further description of Duquesne Light's electromagnetic field practices and policies are provided in Attachment 11 to BI Crescent Siting Application.
- 28. No communication towers, pipelines, or other utilities will be affected by the proposed Project.
- 29. Several major roadways, including I-79, will be spanned by the various segments of the Project. Pennsylvania Department of Transportation ("PennDOT") Highway Occupancy

Permits or equivalent type permits will be acquired by Duquesne Light for these major highways and all other state roads prior to construction.

30. Aviation coordination will be conducted through the Federal Aviation Association ("FAA"). Duquesne Light will assure that that the pole locations and heights are properly recorded by the FAA. Duquesne Light will comply with any additional lighting or other visual aids that may be required by these agencies to assure aviation safety in the region.

31. A further description of the safety considerations which will be incorporated into the design, construction and maintenance of the proposed Project are provided in Attachment 11 to the BI – Crescent Siting Application.

V. PROPERTY FOR WHICH EMINENT DOMAIN APPROVAL IS SOUGHT

32. The service to be furnished by Duquesne Light through the proposed BI – Crescent Project is necessary or proper for the service, accommodation, convenience, or safety of the public for the reasons set forth in the BI – Crescent Siting Application and supporting Attachments and Testimonies that are incorporated herein by reference.

33. A certain portion of the route selected for the BI – Crescent Project crosses a tract of land located at parcel number 0418C00122000000, Allegheny County, Pennsylvania.

34. A deed for the property is recorded at Allegheny County, Pennsylvania in Deed Book 2340, at page 278, and a copy of said recorded deed is provided in this proceeding in Duquesne Light Exhibit No. MH-2, which is attached to Duquesne Light Statement No. 1 (Schaefer).

35. The name and mailing address of the owner of record of said tract of land is:

George N. Schaefer Schaefer Blvd. Coraopolis, PA 15108

- 36. Upon information and belief, Duquesne Light believes George Nicholas Schaefer was married to Alice Marguerite Abbott Schaefer and they had six children. George died in 1946 and Alice died in 1952. Research with the Register of Wills of Allegheny County found that no wills existed for either George N. or Alice M. Schaefer.
- 37. After further extensive research, Duquesne Light located one child of George Schaefer, Beatrice Sullivan, and seven grandchildren still living. Duquesne Light reached out to one of the grandchildren, who confirmed that they were the heirs of Mr. Schaefer. The family is interested in negotiating a right of way for the property, but that transfer must go through the Allegheny County Probate Courts, which may take some time. Further, Duquesne Light understands that the presumptive heirs to the estate are attempting to resolve their respective interests.
- 38. Duquesne Lights will continue discussions with the family and its attorney, but hereby files this Application a finding and determination, pursuant to 15 Pa. C.S. § 1511(c), that the service to be furnished through Duquesne Light's proposed exercise of the power of eminent domain is necessary or proper for the service, accommodation, convenience, or safety of the public, in the even that these efforts are unsuccessful or cannot be resolved in a timely manner. Moreover, in order to afford all known individuals who may have an interest in the property adequate notice, Duquesne Light is serving the BI Crescent Siting Application and this Condemnation Application upon all known individuals who may have an interest in the property and known counsel currently representing such individuals.
- 39. Duquesne Light desires to acquire a right of way and easement over the aforesaid land for the construction, operation, and maintenance of a segment of the 138 kV transmission

line associated with the BI – Crescent Project to transmit electric energy for light, heat, and power.

- 40. The existing and newly-obtained rights-of-way for the BI Crescent Project will vary in width to accommodate environmental, engineering, and constructability issues, as well as ensure compliance with NESC clearances.
- 41. The property sought to be acquired in this Application does not include property used as a burying ground, place of public worship, a dwelling house, or any part of the reasonable curtilage appurtenant thereto.
- 42. A map depicting the proposed right-of-way across the Schaefer property is provided in this proceeding in Duquesne Light Exhibit No. MH-3, which is attached to Duquesne Light Statement No. 1 (Schaefer).
- 43. Duquesne Light currently is attempting to voluntarily negotiate and obtain a right-of-way and easement over a portion of said tract of land for the purposes described above but, to date, has been unable to reach any agreement with the property owner and any other individuals who may have interest in the property. Accordingly, Duquesne Light herein files this Application for a finding and determination, pursuant to 15 Pa. C.S. § 1511(c), that the service to be furnished through Duquesne Light's proposed exercise of the power of eminent domain for the BI Crescent Project is necessary or proper for the service, accommodation, convenience, or safety of the public.
- 44. Duquesne Light remains willing to negotiate a reasonable and mutually acceptable right-of-way agreement with George N. Schaefer and any other individuals who may have interest in the property and thereby avoid the need to condemn a right of way across the property. However, given the construction schedule and in-service date for the proposed BI –

Crescent Project, it is necessary for Duquesne Light to seek Commission approval to exercise the power of eminent domain in order to ensure that the BI – Crescent Project is constructed and operational by the in-service date. In the event that George N. Schaefer and any other individuals who may have interest in the property and Duquesne Light reach an agreement for the easement and right-of-way needed, Duquesne Light will withdraw the eminent domain application.

VI. THE REQUIREMENTS FOR CONDEMNATION HAVE BEEN SATISFIED

- 45. No other public utility is now furnishing or has the corporate authority and certificate to furnish the same service as, or service similar to, that which Duquesne Light will furnish by means of the transmission line to be constructed in the proposed right of way and easement over the land to be acquired as set forth in this Application.
- 46. The service to be furnished by Duquesne Light through the proposed new BI Crescent 138 kV Transmission Line and related facilities is necessary or proper to provide safe and reliable electric service to customers in Allegheny County.
- 47. Appropriate resolutions will be adopted by Duquesne Light's Board of Directors authorizing and directing this Application. A copy of the applicable resolutions will be provided as soon as they become available.

VII. CONSOLIDATION OF RELATED PROCEEDINGS

48. On July 16, 2018, Duquesne Light filed the BI – Crescent Siting Application. Therein, Duquesne Light is requesting approval to site and construct the 138 kV transmission line associated with the BI – Crescent Project, including the portion of the proposed transmission line that is the subject of this Application. Issues relating to the necessity for BI – Crescent Project are interrelated with this Application.

- 49. In accordance with the requirements of 52 Pa. Code §57.75(i)(2), Duquesne Light is serving a complete copy of the BI Crescent Siting Application, together with the accompanying Attachments and Testimony, upon George N. Schaefer, and the other individuals described above, who is/are the record owner(s) of the property that Duquesne Light seeks to acquire by the exercise of the power of eminent domain.
- 50. Pursuant to 52 Pa. Code § 57.75(i)(1), Duquesne Light requests that these related proceedings be consolidated for purposes of hearings, if necessary, and decision.

VIII. <u>CONCLUSION</u>

WHEREFORE, Duquesne Light Company respectfully requests that the Pennsylvania Public Utility Commission: (1) consolidate this Application for approval of the exercise of the power of eminent domain with the BI - Crescent Project Siting contemporaneously filed herewith; and (2) find and determine that the service to be furnished by Duquesne Light through the proposed exercise of the power of eminent domain, as set forth above, is reasonably necessary or proper for the service, accommodation, convenience, or safety of the public.

Tishekia Williams (PA ID # 208997) Emily Farah (PA ID # 322559) Duquesne Light Company 411 Seventh Avenue Pittsburgh, PA 15230-1930

E-mail: twilliams@duqlight.com

E-mail: efarah@duqlight.com

Respectfully submitted,

Anthony D Karlagy (PA ID # 85522) Garrett P. Lent (PA ID # 321566)

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Attorneys for Duquesne Light Company Date: March 15 2019

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Duquesne Light Company: Under 15 Pa.C.S. § 1511(c) For A Finding: and Determination That the Service to be: Furnished by the Applicant Through Its: Proposed Exercise of the Power of Eminent: Domain to Acquire a Certain Portion of the: Lands of George N. Schaefer of Moon: Township, Allegheny County, Pennsylvania: for the Siting and Construction of: Transmission Lines Associated with the: Proposed Brunot Island – Crescent Project is: Necessary or Proper for the Service,: Accommodation, Convenience, or Safety of: the Public

Docket No. A-2019-____

DUQUESNE LIGHT COMPANY

STATEMENT NO. 1 (SCHAEFER)

TESTIMONY OF LESLEY GANNON

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1		Direct Testimony of Lesley Gannon
2	Q.	Please state your full name and business address.
3	A.	My name is Lesley Cummings Gannon. My business address is 1800 Seymour Street,
4		Pittsburgh, PA 15233.
5		
6	Q.	By whom are you employed and in what capacity?
7	A.	I am employed by Duquesne Light Company ("Duquesne Light" or the "Company") as
8		the Senior Manager of Real Estate and Rights of Way. In my position, I am responsible
9		for managing all of the real estate-related acquisitions and divestitures for the Company.
10		
11	Q.	What are your qualifications, work experience and educational background?
12	A.	I have been employed by Duquesne Light Company since 2013. In my current position, I
13		manage the Real Estate Department, which has one Real Estate Specialist, one Supervisor
14		of Survey and Right of Way, four surveying technicians, four right of way agents and a
15		clerk. The Real Estate Department was formed in late 2017, and I have been in my
16		current position for one year and 5 months. I am also Assistant Corporate Secretary for
17		the Company.
18		Prior to assuming my present position at Duquesne Light, I was Managing
19		Counsel, Commercial/General in the Company's Office of the General Counsel for 4
20		years and 9 months, in which position I managed all transactional work at the Company,

including any legal issues relating to real estate. Prior to being hired by the Company, I

performed similar work as contract counsel for the Company from May of 2008. From

2005 to 2013, in addition to representing the Company as set forth above, I managed my

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law firm, Gannon Law Offices, which represented small and mid-sized businesses in the Pittsburgh area in transactional and real estate matters. From 2001 to 2005, I was an associate at Sherrard, German & Kelly, P.C. in their financial services and transactional practice groups. Prior to 2001, I held various positions in the financial services industry.

I am an attorney licensed to practice law in the Commonwealth of Pennsylvania since 2001. I graduated from Duquesne University School of Law in 2001 and was admitted to the Pennsylvania Bar in 2001. I also hold a Bachelor of Arts in Business and Communications from Carlow University.

A.

Q. What are your responsibilities in connection with the Brunot Island-Crescent Project?

The Company worked with Burns and McDonnell to identify the parcel owners on and adjacent to the proposed Project line, identify any areas in which the Company will require new or enhanced rights of way for the Project, and acquire such rights of way. In October 2017, the Company's Rights of Way and Survey groups came under the new Real Estate Department and my supervision. The Company held public meetings on February 21, 2017, February 28, 2017 and March 2, 2017 at the Crescent Municipal Building, VFW Post 418 Hall in McKees Rocks and Kennedy Township Fire Department to provide information about the Project to owners of property in the area. At this meeting, Company representatives: delivered informational presentations about the Project need, route, design, and operational characteristics; answered questions from attendees; and provided informational literature regarding property owner rights, eminent domain, and a surveying permission form.

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to describe the property of George N. Schaefer as it relates to the Project, and describe the Company's proposed right-of-way and easement over said property.

A.

7 Q. Please summarize the proposed Brunot Island - Crescent Project.

The Project is the subject of the Application of Duquesne Light Company filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for Approval of the Siting and Construction of the 138 kV Transmission Lines Associated with the Brunot Island – Crescent Project in the City of Pittsburgh, McKees Rocks Borough, Kennedy Township, Robinson Township, Moon Township, and Crescent Township, Allegheny County, Pennsylvania ("Siting Application"), which the Company is filing contemporaneously with the Condemnation Application that is the subject of my testimony.

As explained in the Siting Application, the Project is necessary to replace existing facilities and establish a permanent, reliable link between electric transmission facilities from the Brunot Island Substation to the Crescent Substation in Allegheny County. The Company proposes to construct a new 138 kilovolt ("kV") from the Brunot Island Substation to the Crescent Substation.

Q. Does any portion of the Project's Proposed Route cross over the George N. Schaefer property?

1	A.	Yes. The 138 kV transmission lines would run approximately 1,079 feet on the property
2		of George N. Schaefer. The Project's proposed crossing over the George N. Schaefer
3		property is illustrated in Duquesne Light Exhibit No. LG-3 (Schaefer), discussed more
4		fully below. The Company has attempted to purchase an easement over the George N.
5		Schaefer property to accommodate the Project, but has been unable to reach an agreement
6		with the property owner to date, as the property owner is deceased.
7		
8	Q.	Have you, and/or the right-of-way agents working under your supervision, been to
9		the George N. Schaefer property?
10	A.	The survey crew under my supervision has been to the George N. Schaefer property, and
11	,	the contracted right-of-way agents under the supervision of the Company's former
12		Supervisor of Survey and Rights of Way visited the property.
13		
14	Q.	Please describe the property.
15	A.	The land is located in Moon Township with the terrain being undulating, undeveloped
16		and having some thickets and trees and is Zoned - Residential. It is for the most part
17		open with low grass on the property. The lines travel in a northwesterly direction.
18		
19	Q.	Are there any dwellings on the property?
20	A.	No.
21		
22	Q.	Does the Company's proposed right-of-way and easement of the George N. Schaefer
23		property contain any burial grounds or places of worship?

3	Q.	Please explain Duquesne Light Exhibit LG-1 (Schaefer).
4	A.	Duquesne Light Exhibit LG-1 (Schaefer) is a copy of the Map of the proposed Project.
5		
6	Q.	Please explain Duquesne Light Exhibit LG-2 (Schaefer).
7	A.	Duquesne Light Exhibit LG-2 (Schaefer) is a copy of the deed for the George N. Schaefer
8		property, which is recorded in Allegheny County.
9		
10	Q.	Please explain Duquesne Light Exhibit LG-3 (Schaefer).
11	A.	Duquesne Light Exhibit LG-3 (Schaefer) is a copy of the Plan showing the George N.
12		Schaefer property, including the portion over which the Company seeks a right of way
13		and easement.
14		
15	Q.	Please explain Duquesne Light Exhibit LG-4 (Schaefer).
16.	A.	Duquesne Light Exhibit No. LG-4 (Schaefer) is a description of the easement over the
17		Schaefer property, which is depicted in Exhibit No. LG-3 (Schaefer).
18		
19	Q.	In your opinion, is the service to be furnished through the condemnation of this
20		property necessary?
21	A.	Yes. The service the Company shall provide through the Project is necessary or proper
22		for the service, accommodation, convenience, or safety of the public for the reasons set
23		forth in my testimony, in this Condemnation Application, and in the Siting Application.

No.

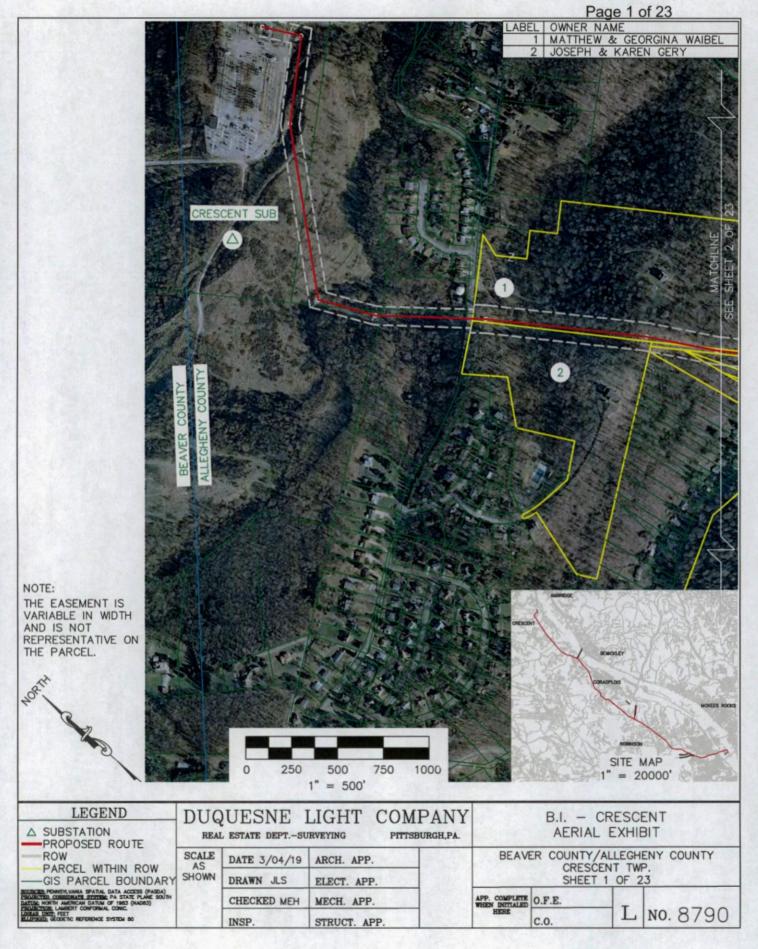
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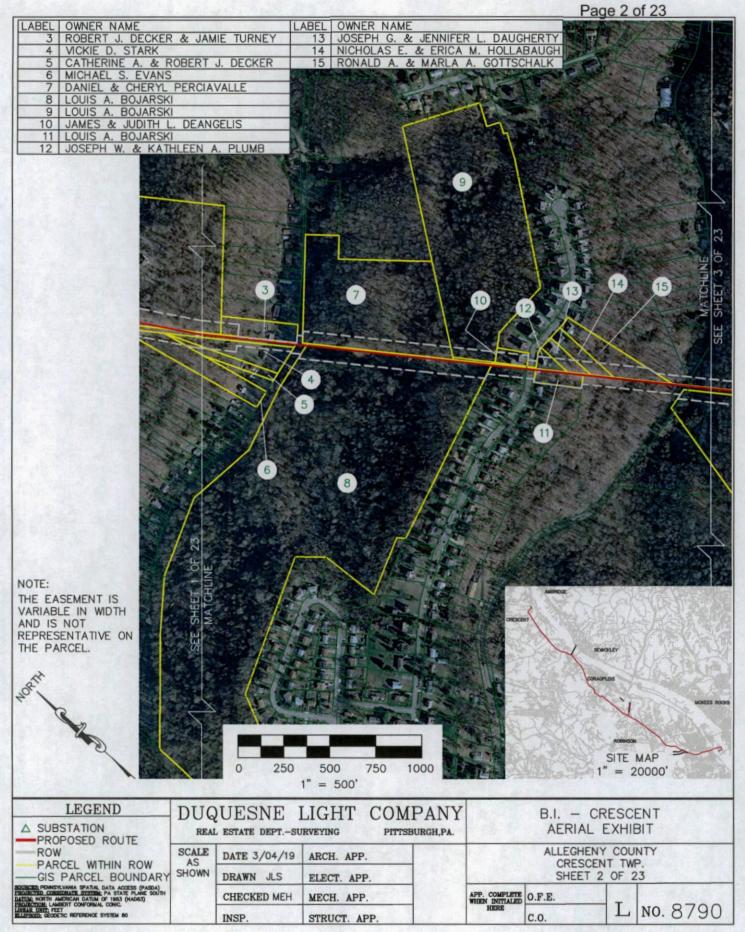
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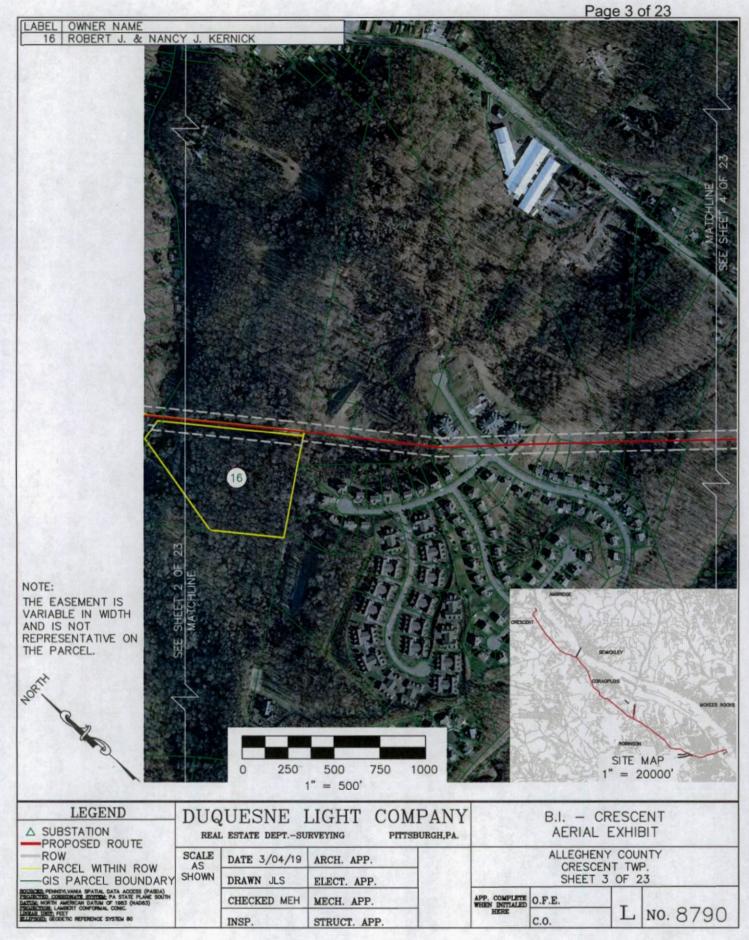
- 1
- 2 Q. Does this conclude your Direct Testimony at this time?
- 3 A. Yes.

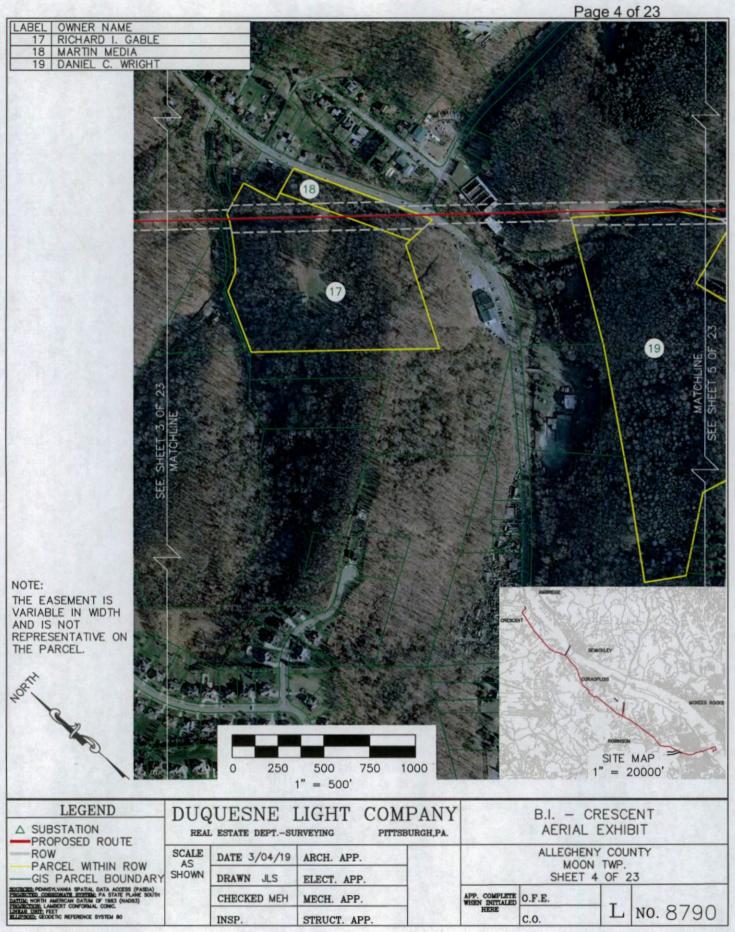
DLC Exhibit LG-1 (Schaefer)

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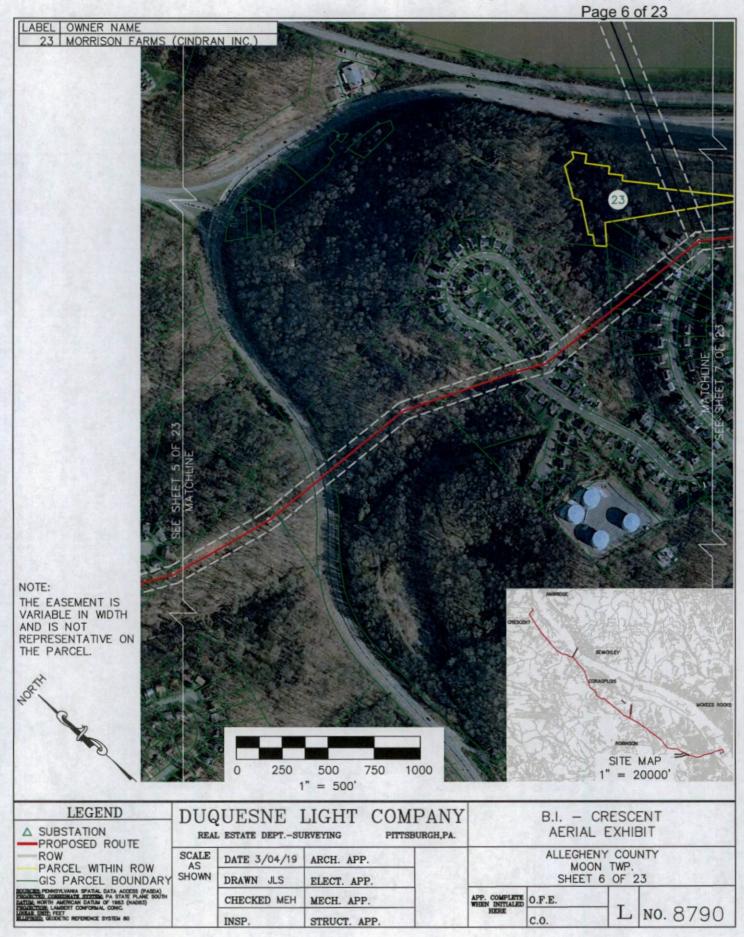


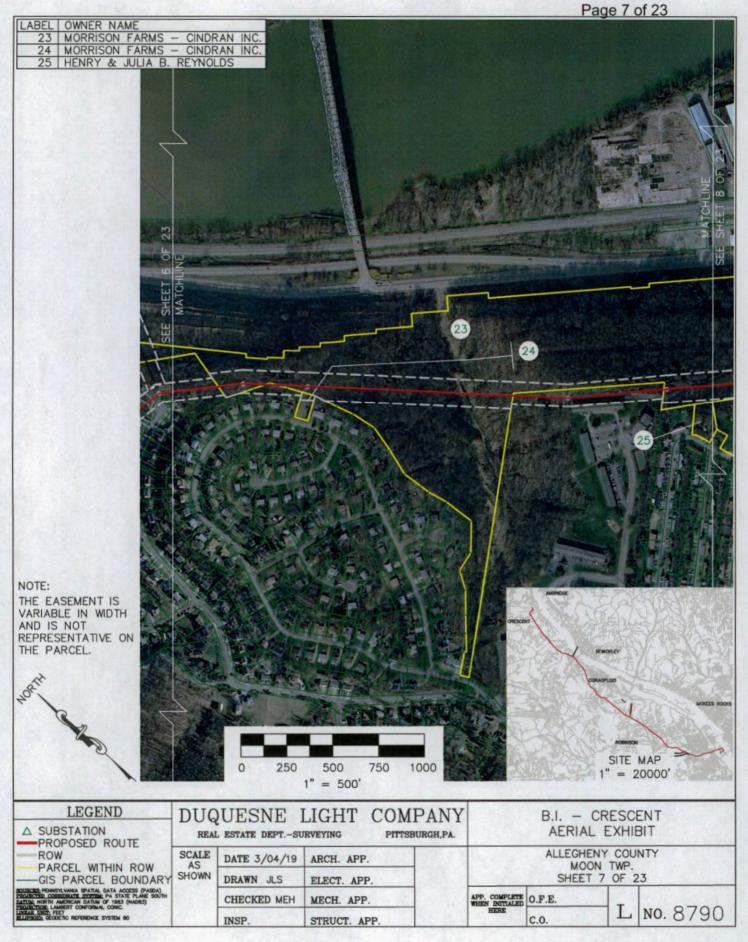


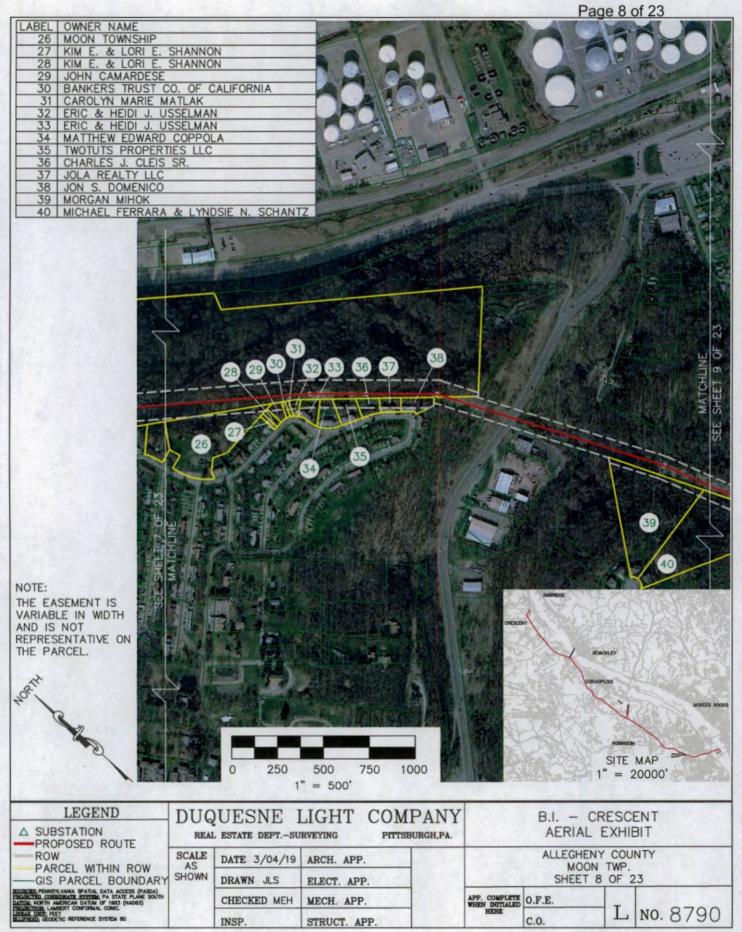


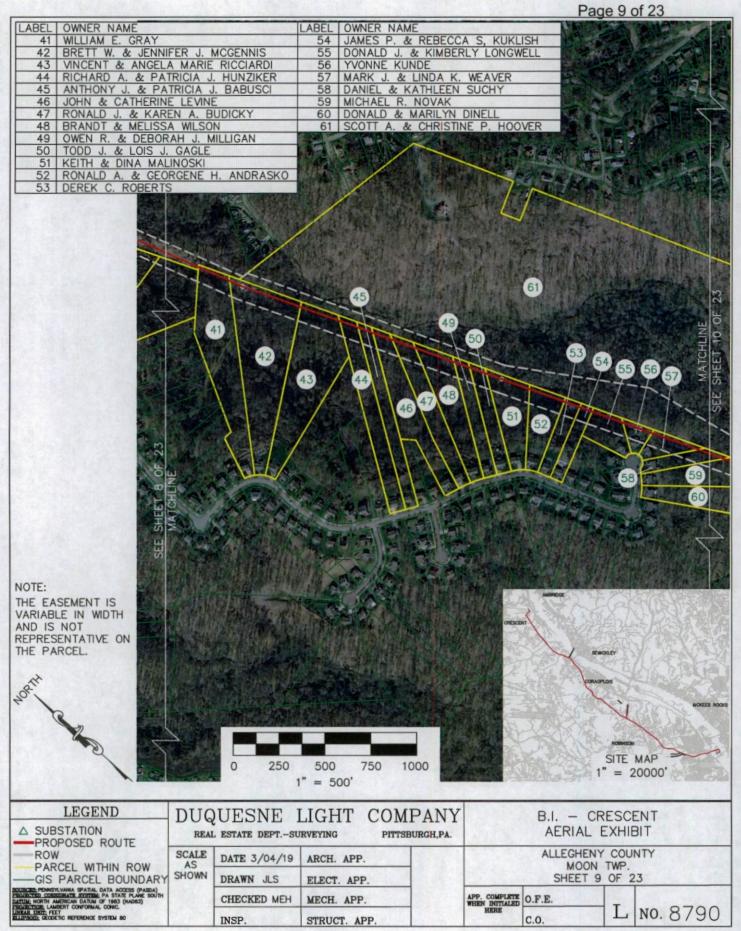


Page 5 of 23 LABEL OWNER NAME 20 MICHAEL R. NOVAK
21 GEOFFREY W. & MEGAN A. HATTON
22 CHRISTINA M. COLAROSSI NOTE: THE EASEMENT IS VARIABLE IN WIDTH SEE AND IS NOT REPRESENTATIVE ON THE PARCEL. SITE MAP 250 500 750 1000 = 20000' 1" = 500' LEGEND DUQUESNE LIGHT COMPANY B.I. - CRESCENT △ SUBSTATION AERIAL EXHIBIT REAL ESTATE DEPT.-SURVEYING PITTSBURGH,PA. PROPOSED ROUTE ALLEGHENY COUNTY ROW SCALE DATE 3/04/19 ARCH. APP. AS SHOWN MOON TWP. PARCEL WITHIN ROW SHEET 5 OF 23 GIS PARCEL BOUNDARY DRAWN JLS ELECT. APP. CHECKED MEH MECH. APP. WHEN INITIALED O.F.E. L No. 8790 FEET ECCETIC REFERENCE SYSTEM BO INSP. STRUCT. APP. C.O.

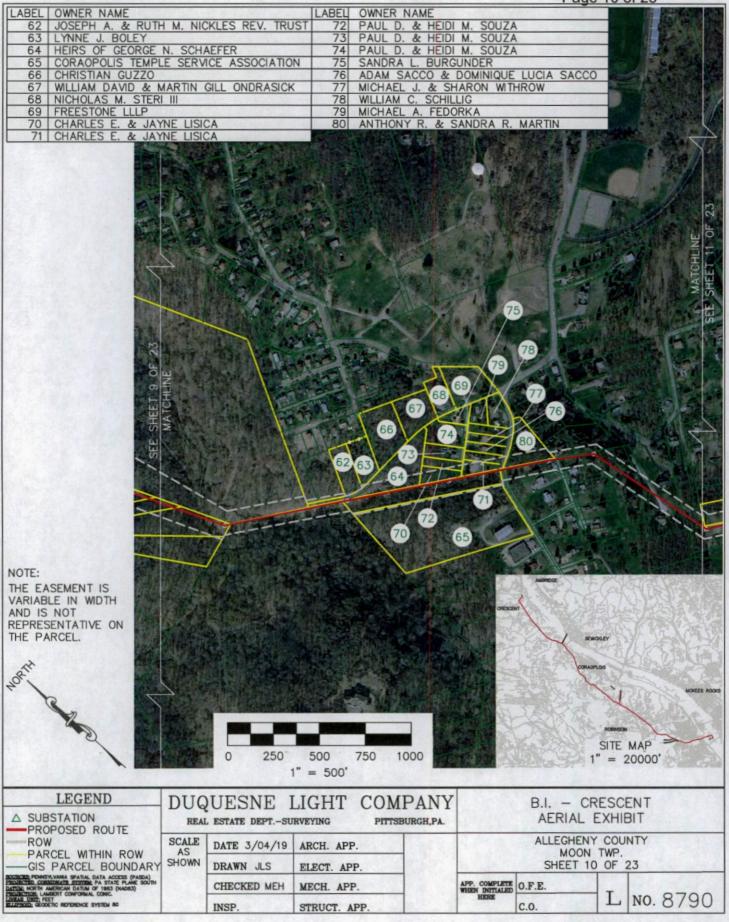




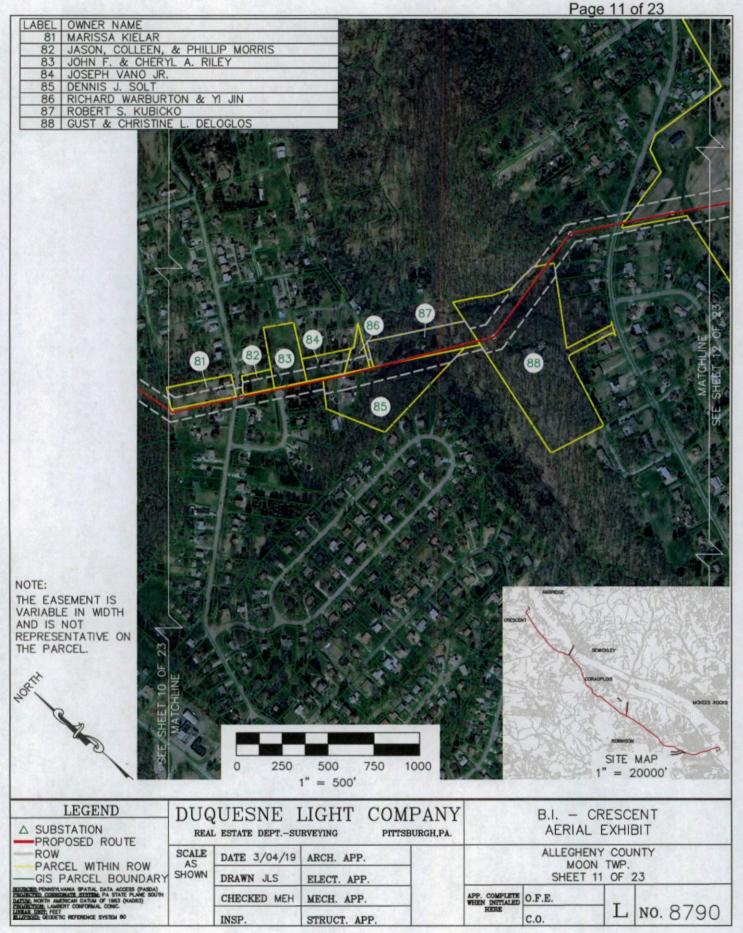




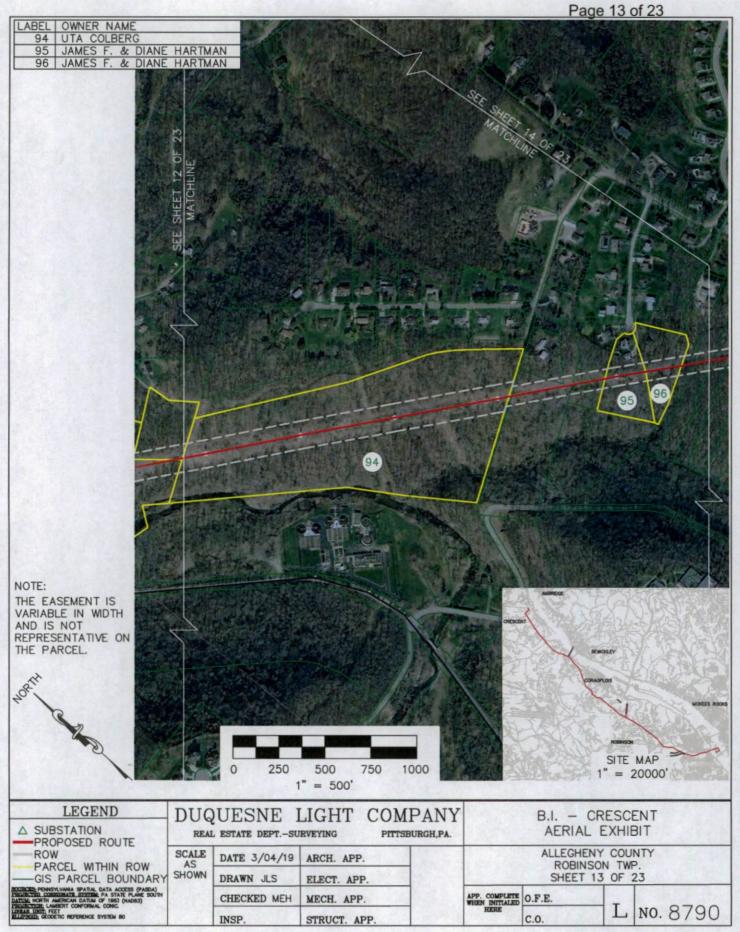
Page 10 of 23



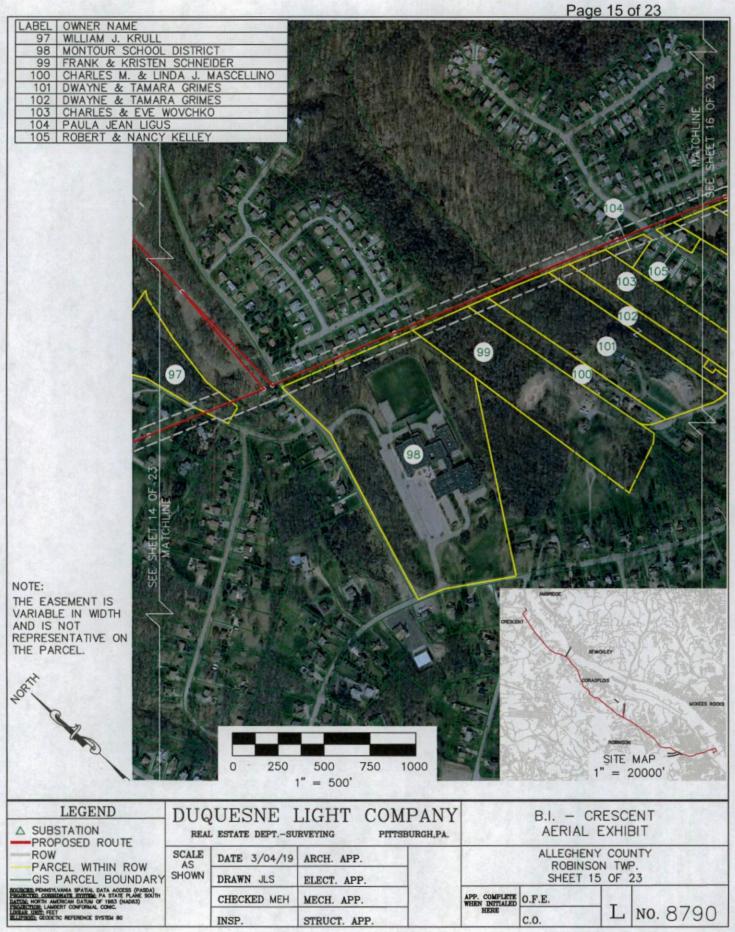
Duquesne Light Exhibit LG-1 (Schaefer)



Page 12 of 23 LABEL OWNER NAME 89 FELICIAN SISTERS OF NORTH AMERICAN REAL EST.
90 MICHAEL & TAMMY LEWICKI
91 ADOLPH & JEAN PLACEK
92 TERRY & MAUREEN PLACEK
93 COY ALLEN NOTE: THE EASEMENT IS VARIABLE IN WIDTH AND IS NOT REPRESENTATIVE ON THE PARCEL. SITE MAP 250 500 750 1000 = 20000' 1" = 500' LEGEND DUQUESNE LIGHT COMPANY B.I. - CRESCENT △ SUBSTATION AERIAL EXHIBIT REAL ESTATE DEPT.-SURVEYING PITTSBURGH, PA. PROPOSED ROUTE ALLEGHENY COUNTY ROW SCALE DATE 3/04/19 ARCH. APP. AS SHOWN MOON TWP. & ROBINSON TWP. SHEET 12 OF 23 PARCEL WITHIN ROW GIS PARCEL BOUNDARY DRAWN JLS ELECT. APP. CHECKED MEH MECH. APP. O.F.E. L No. 8790 E FEET REFERENCE SYSTEM 80 INSP. STRUCT. APP. C.O.



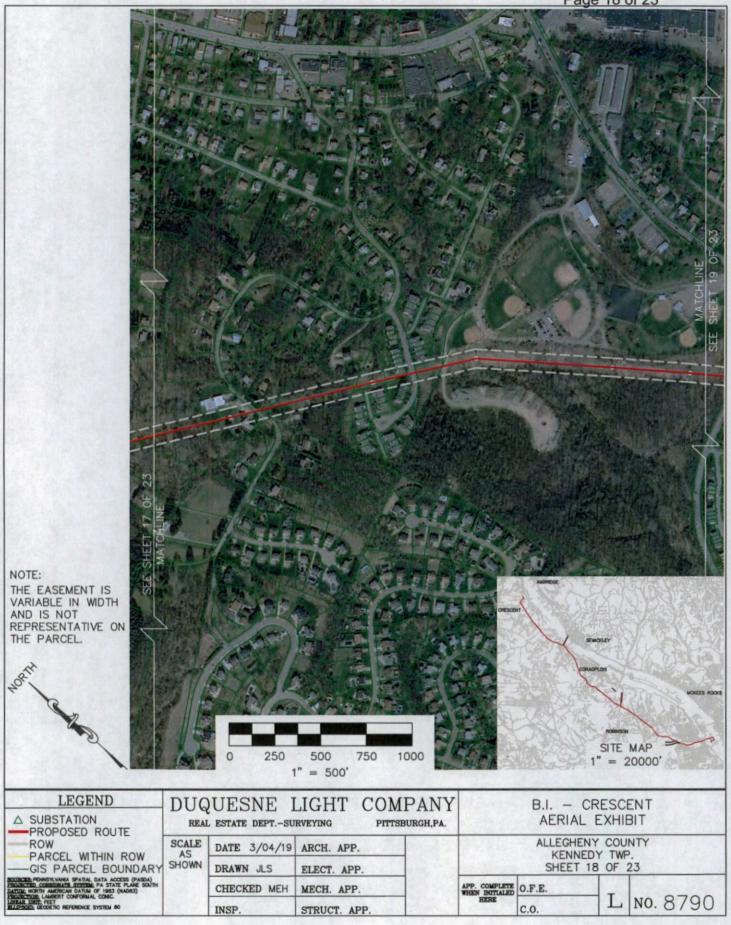
Page 14 of 23 MONTOUR SUBSTATIO NOTE: THE EASEMENT IS VARIABLE IN WIDTH AND IS NOT REPRESENTATIVE ON THE PARCEL. SITE MAP 500 750 1000 250 = 20000' 1" = 500' LEGEND DUQUESNE LIGHT COMPANY B.I. - CRESCENT △ SUBSTATION AERIAL EXHIBIT REAL ESTATE DEPT.-SURVEYING PITTSBURGH,PA. PROPOSED ROUTE ALLEGHENY COUNTY ROW SCALE DATE 3/04/19 ARCH. APP. AS SHOWN ROBINSON TWP. SHEET 14 OF 23 PARCEL WITHIN ROW GIS PARCEL BOUNDARY DRAWN JLS ELECT. APP. APP. COMPLETE O.F.E. CHECKED MEH MECH. APP. L No. 8790 E FEET GEODETIC REFERENCE SYSTEM 80 C.O. INSP. STRUCT. APP.



Page 16 of 23 LABEL OWNER NAME 106 JOHN & EDWARD A. WOVCHKO 107 WILLIAM & REBECCA KUTZAVITCH NOTE: THE EASEMENT IS VARIABLE IN WIDTH AND IS NOT REPRESENTATIVE ON THE PARCEL. SITE MAP 250 500 750 1000 = 20000' 1" = 500' LEGEND DUQUESNE LIGHT COMPANY B.I. - CRESCENT △ SUBSTATION AERIAL EXHIBIT REAL ESTATE DEPT.-SURVEYING PITTSBURGH, PA. PROPOSED ROUTE ALLEGHENY COUNTY ROW SCALE DATE 3/04/19 ARCH. APP. AS SHOWN ROBINSON TWP. PARCEL WITHIN ROW SHEET 16 OF 23 GIS PARCEL BOUNDARY DRAWN JLS ELECT. APP. CHECKED MEH MECH. APP. O.F.E. L No. 8790 EDETIC REFERENCE SYSTEM BO INSP. STRUCT. APP. C.O.



Page 18 of 23



Duquesne Light Exhibit LG-1 (Schaefer) Page 19 of 23 SITE MAP 750 1000 = 20000'

APP. COMPLETE O.F.E.

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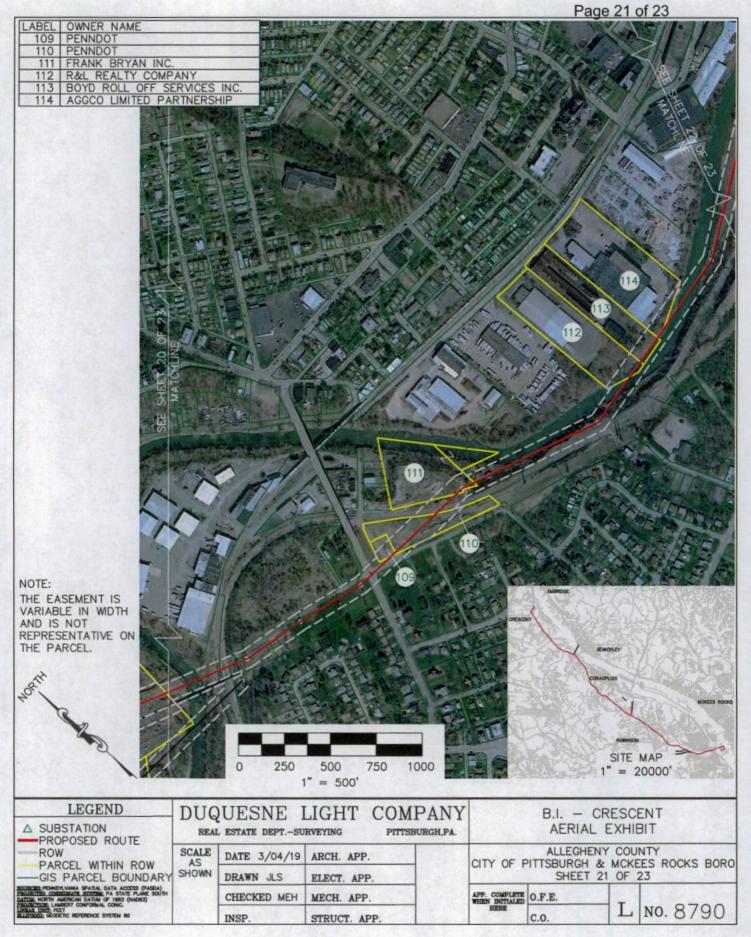
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Page 20 of 23 LABEL OWNER NAME 108 STANLEY CIESLAK NOTE: THE EASEMENT IS VARIABLE IN WIDTH AND IS NOT REPRESENTATIVE ON THE PARCEL. SITE MAP 250 500 750 1000 = 20000' 1" = 500' LEGEND DUQUESNE LIGHT COMPANY B.I. - CRESCENT △ SUBSTATION AERIAL EXHIBIT REAL ESTATE DEPT.-SURVEYING PITTSBURGH, PA. PROPOSED ROUTE ALLEGHENY COUNTY KENNEDY TWP. SCALE AS SHOWN ROW DATE 3/04/19 ARCH. APP. PARCEL WITHIN ROW SHEET 20 OF 23 GIS PARCEL BOUNDARY DRAWN JLS ELECT. APP. APP. COMPLETE O.F.E. CHECKED MEH MECH. APP. L No. 8790 FEET ECODETIC REFERENCE SYSTEM BO INSP. STRUCT. APP. C.O.

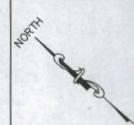


Duquesne Light Exhibit LG-1 (Schaefer) Page 22 of 23 LABEL OWNER NAME 115 MCKEES ROCKS COMMERCIAL PROPERTY LLC 116 CHARTIERS CROSSING LP
117 OLD TOWN PROPERTIES
118 CRIVELLI LIMITED PARTNERSHIP 119 GREENVILLE COMMERCIAL PROPERTIES LP 120 CMC REALTY 121 JAMES F. FRANK & KAREN L. SCHOPPE 122 VICTOR ALBERT SUTEY NOTE: THE EASEMENT IS VARIABLE IN WIDTH AND IS NOT REPRESENTATIVE ON THE PARCEL. SITE MAP 500 750 1000 = 20000' 1" = 500' LEGEND DUQUESNE LIGHT COMPANY B.I. - CRESCENT △ SUBSTATION AERIAL EXHIBIT REAL ESTATE DEPT.-SURVEYING PITTSBURGH,PA. PROPOSED ROUTE ALLEGHENY COUNTY ROW SCALE DATE 3/04/19 ARCH. APP. PARCEL WITHIN ROW

A SUBSTATION PROPOSED ROUTE ROW PARCEL WITHIN ROW GIS PARCEL BOUNDARY MINSP. REAL ESTATE DEPT.—SURVEYING PITTSBURGH,PA. REAL ESTATE DEPT.—SURVEYING PITTSBURGH,PA. AERIAL EXHIBIT ALLEGHENY COUNTY CITY OF PITTSBURGH & MCKEES ROCKS BORO SHEET 22 OF 23 APP. COMPLETE OF PITTSBURGH & MCKEES ROCKS BORO SHEET 22 OF 23 APP. COMPLETE OF PITTSBURGH & MCKEES ROCKS BORO SHEET 22 OF 23 APP. COMPLETE OF PITTSBURGH & MCKEES ROCKS BORO SHEET 22 OF 23 APP. COMPLETE WHEN INITIALED HERE INSP. STRUCT. APP. INSP. STRUCT. APP.

Duquesne Light Exhibit LG-1 (Schaefer) Page 23 of 23 BRUNOTS ISLAND SUB

NOTE: THE EASEMENT IS VARIABLE IN WIDTH AND IS NOT REPRESENTATIVE ON THE PARCEL.



ONSOLEY O 250 500 750 1000 1" = 500' DOSSOURT SITE MAP 1" = 20000'

LEGEND A SUBSTATION PROPOSED ROUTE ROW PARCEL WITHIN ROW GIS PARCEL BOUNDARY SOURCED POINTIVARIA SPATIAL DATA ACCESS (PASDA) FEMALIANCE CONSTRUMENT ENTIRE A STATE FLARE SOUTH BETTEL ROTTH ALEBECAN DATA OF 1983 (MASDS) FEMALIA DATA ACCORNINAL CORNEL BELLEVIS DATE ALEBET ACCORNINAL CORNEL BELLEVIS DATE BELLEVI		UESNE I	LIGHT COMPA		B.I. — CRESCENT AERIAL EXHIBIT			
	SCALE AS SHOWN	DATE 3/04/19 DRAWN JLS	ARCH. APP.	CITY OF F	ALLEGHENY COUNTY CITY OF PITTSBURGH & MCKEES ROCKS BORO SHEET 23 OF 23			
		CHECKED MEH	MECH. APP.	APP. COMPLETE WHEN INITIALED HERE	O.F.E.	Τ.	NO. 8790	
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DLC Exhibit LG-2 (Schaefer)

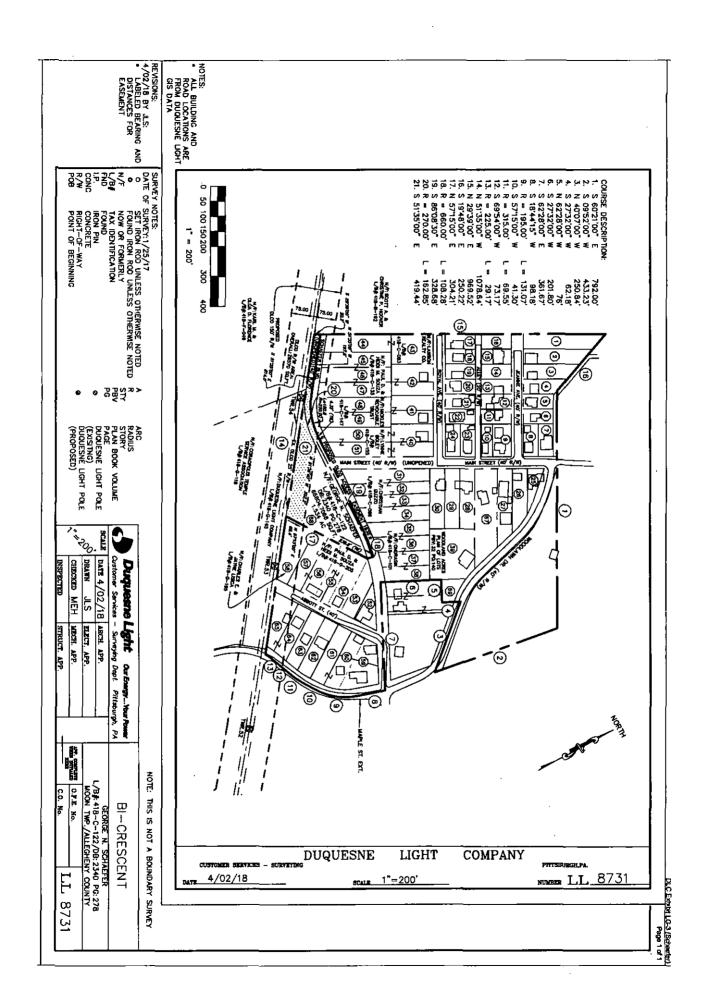
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COLLIONWEALTH OF PENNSYLVANIA
                                                   On this 24th day of October, A.D. 1927, before me,
COUNTY OF ALLEGHENY
                                       SS.
                                                  a Notary Public in and for said County and State
                                                   came the above mamed Ida May Trout and Roy C. Trout.
her husband, and acknowledged the foregoing Indenture to be their act and deed, to the end
that it may be recorded as such.
               WITNESS my hand and notarial seal.
                                                   Alice Linnert
                                                                       Notary Public . (N. P. Seal)
                                                  My commission expires January 17, 1931
Registered in Allegheny County and City of Pittsburgh
No. 58425 Recorded October 25th, 1927 Time 2:44 P.M.
Written by Johnston Compared by _______
CHARLES DELP. ET UX.
                                                             THIS INDENTURE
                                   - NADE the 8th day of October in the year of our Lord one
        TO
GEORGE N. SCHAEFER
                                      thousand nine hundred and twenty-seven
                                      BETWEEN CHARLES DELP and CORA E. DELP, his wife, of the City
of Pittsburgh, County of Allegheny, State of Pennsylvania, parties of the first part and GEORGE H. SCHAEFER, of the City of Pittsburgh, County of Allegheny, State of Pennsylvania,
party of the second part:
              WITNESSETH, that the said parties of the first part, in consideration of Eleven
Thousand ($11,000.00) Dollars to them now paid by the said party of the second part, do
grant, bargain, sell and convey unto the said party of the second part, his heirs and assigns
              ALL that certain parcel or plot of land situate in Moon Township, County of
Allegheny, State of Pennsylvania, being bounded and described as follows:
              BECINNING on the dividing line between the properties of the party of the first
part and the WOODLAWN Plan of Lots, at the south end of a 12-foot alley in said plan, and
running thence along the Woodlawn Plan of Lots to the property of the Coraopolis Cemetery Company and the south side of Watson Street S. 60° 21' East, 792 feet; thence along the lands of the Coraopolis Cemetery Company south 9° 52' West 433.23 ft. to the line of the
center of a township road; thence along the center of said township road and land of Deorge Ondrasick north 40° 7' west 250.84 feet; thence leaving said road and running along the land of George Ondrasick south 27° 32' west 62.18 feet; thence still along the lands of said George Ondrasick north 62° 28' west 76 feet, and south 27° 32' west 201.80 feet to the center of a 40-foot road; thence along the center of said 40-foot road and land of George
Ondrasick south 62° 28' east 361.67 feat to the center of the county road known as the
Coracpolis Heights road; then along center of said county road south 18° 44' and 15" west
98.18 feet; then by a curve to the right with a radius of 195 feet a distance of 131.07 feet; thence south 57° 15' west 41.30 feet; then by a curve to the right with a radius of 315 feet a distance of 69.55 feet; thence south 69° 54' west 73.17 feet; thence by a curve
to the left with a radius of 225 feet a distance of 29.17 feet to the northerly line of
the right-of-way of the Duquesne Light Company transmission line, and the property of S. E.
Pence; then leaving said road and running along the line of said right-of-way and along the properties of S. E. Pence and S. S. Robertson north 51 35 west 1078.64 feet; thence by
other lands of the party of the first part north 29° 39' east 969.52 feet to the westerly
line of the Woodlawn Plan of Lots; thence along the westerly line of said Woodlawn Plan of
Lots south 19° 48' east 250.22 fact to the place of beginning.
               Subject to all outstanding oil and gas leases and rights-of-way for pipe lines.
               BEING part of the same property which Olivia K. Cassidy by her deed dated May
15th, 1922 and of record in the said Recorder's Office in Deed Book Vol. 2136, page 22,
granted and conveyed unto Charles Delp, one of the parties of the first part hereto.
               With the appurtementes: TO HAVE AND TO HOLD the same unto and for the use of
said party of the second part his heirs and assigns forever,
And the said Charles Delp, and Cora E. Delp, his wife, for themselves, their
heirs, executors and administrators covenant with the said party of the second part his
heirs and assigns against all lawful claimants the same and every part thereof to Warrant
and Defend.
               WITNESS the hands and seals of the said parties of the first part.
      Attest:
                                                                                                       (Seal)
                                                                        Charles Delp
 J. L. Trefaller Jr.
                                                                        Cora E. Delp
                                                                                                       (Seal)
                                                 On this 8th day of October A.D. 1927, before me Notar
COMMONVEALTH OF PENNSYLVANIA
                                                 Public in and for said State and County came the
COUNTY OF ALLECKERY
                                                 above named Charles Dalp and Gora E. Delp, his wife,
and acknowledged the foregoing Indenture to be their act and deed, to the end that it may
be recorded as such.
              WITNESS my hand and Notarial seal.
                                                J. L. Trefaller Jr.
                                                                              Notary Public
                                                My commission expires March 26, 1929
Registered in Allegheny County
No. 58426 Recorded October 25th, 1927 Ti
                                                  Time 2:51 P.M.
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_ and _/recordener

DLC Exhibit LG-3 (Schaefer)

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SECRETARY'S BURE



DLC Exhibit LG-4 (Schaefer)



EASEMENT DESCRIPTION

All that certain strip of land being a portion of Lot 68 and a portion of an unopened Schaefer Boulevard as shown in Woodland Acres, recorded in Plan Book Volume 32, Page 140 in Allegheny County Department of Real Estate, situate in Moon Township, Allegheny County and the Commonwealth of Pennsylvania, being more particularly described as follows:

Beginning at southeast corner of said Lot 68 now or formerly owned by George N. Schaefer, being recorded in Deed Book 2340, Page 278 in the Allegheny County Department of Real Estate; thence North 57°15″00″ East, along the east line of said Lot 68, a distance of 65.4 feet, to a point 75 feet east of and parallel with an existing powerline; thence North 51°36′40″ West, along said parallel line, a distance of 302.2 feet to the intersection with a non-tangent point on the arc of a curve to the right, having a radius of 250.00 feet and the centerline of said Schaefer Boulevard; thence northwesterly along the arc of said curve and said centerline, a distance of 150.8 feet; thence North 51°35′00″ West, continuing along said centerline, a distance of 197.6 feet to a point on the west boundary line of said plat; thence South 29°39′00″ West, along said west line, a distance of 20.2 feet to a point on the south line of said plat and south line of said Schaefer Boulevard; thence South 51°35′00″ East, along said south line, a distance of 614.0 feet to a point and the Point of Beginning.

Subject to easements, restrictions, reservations, covenants, and rights-of-way of record.

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Duquesne Light Company filed	:		
Pursuant To 15 Pa.C.S. §1511(c) for a Finding	:	•	
and Determination that the Service to be	:		
Furnished by the Applicant through its Proposed	:		
Exercise of the Power of Eminent Domain to	•		
Acquire a Certain Portion of the Lands of George	:	•	
N. Schaefer in Moon Township, Allegheny	:	Docket No. A-2019-	
County, Pennsylvania Associated with the 138	:	Docket No. A-2019	
kV Transmission Lines Associated with the	:		
Brunot Island - Crescent Project in the City of	:		
Pittsburgh, McKees Rocks Borough, Kennedy	:		
Township, Robinson Township, Moon	:		
Township, and Crescent Township, Allegheny			
County, Pennsylvania.			

VERIFICATION

I, Lesley C. Gannon, being Senior Manager of Real Estate and Rights of Way for Duquesne Light Company, hereby state that the information set forth above is 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).

Date: March 12, 2019

Lesley C. Gannon

Senior Manager of Real Estate and Rights of Way

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Duquesne Light Company filed	:		
Pursuant To 15 Pa.C.S. §1511(c) for a Finding	:		
and Determination that the Service to be	:		
Furnished by the Applicant through its Proposed			
Exercise of the Power of Eminent Domain to			
Acquire a Certain Portion of the Lands of George	:	•	
N. Schaefer in Moon Township, Allegheny	:	Docket No. A-2019-	
County, Pennsylvania Associated with the 138	:	Docket No. A-2019	
kV Transmission Lines Associated with the	•		
Brunot Island - Crescent Project in the City of	:		
Pittsburgh, McKees Rocks Borough, Kennedy	:		
Township, Robinson Township, Moon	:		
Township, and Crescent Township, Allegheny			
County, Pennsylvania.			

VERIFICATION

I, Lesley C. Gannon, being Senior Manager of Real Estate and Rights of Way for Duquesne Light Company, hereby state that the information set forth above is 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).

Date: March 12, 2019

Lesley C. Gannon

Senior Manager of Real Estate and Rights of Way

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing CONDEMNATION APPLICATION has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED

Michael Syme, Esquire Fox Rothschild LLP 500 Grant Street Suite 2500 Pittsburgh, PA 15219

George N. Schaefer Schaefer Boulevard Coraopolis PA 15108

Date: March 15, 2019

Anthony D. Kanagy

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