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June 3, 2019

**Via Electronic Filing**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, PA 17120

**Re: 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  
Docket No. A-2019-3008589**

**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  
Docket No. A-2019-3008652**

Dear Secretary Chiavetta,

Enclosed please find a copy of Duquesne Light Company's Prehearing Memorandum, submitted pursuant to the Prehearing Order dated April 29, 2019 in the above-captioned matters. The enclosed respectfully requests that this matter be assigned to the Commission's Bureau of Technical Utility Services, as Duquesne Light is not aware of any actual or potential intervenors in this proceeding. In the absence of adverse parties, there is no need for an evidentiary hearing before an Administrative Law Judge.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Emily M. Farah", is written over a light blue circular stamp or watermark.

Emily M. Farah

Enclosure

cc: Administrative Law Judge Mary D. Long (with enclosure, via email)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Duquesne Light Company filed : A-2019-3008589  
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. :

Application of Duquesne Light Company : A-2019-3008652  
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. :

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**PREHEARING MEMORANDUM  
OF DUQUESNE LIGHT COMPANY**

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Pursuant to the Prehearing Order of Administrative Law Mary D. Long dated April 29, 2019 and 52 Pa.Code §5.221 - § 5.224, Duquesne Light Company (“Duquesne Light” or the “Company”) hereby submits its Prehearing Conference Memorandum.

**I. INTRODUCTION AND BACKGROUND**

On March 15, 2019, Duquesne Light filed, pursuant to 52 Pa. Code § 57.72, a line siting application requesting Pennsylvania Public Utility Commission (“Commission”) approval to site

and construct approximately 14.5 miles of overhead double-circuit 138 kV transmission lines in the City of Pittsburgh, McKees Rocks Borough, Kennedy Township, Robinson Township, Moon Township, and Crescent Township, Allegheny County, Pennsylvania (Hereinafter called the “Project” or “BI-Crescent Project”), docketed at A-2019-3008589. Duquesne Light also filed an application for eminent domain to acquire a certain portion of the lands of George N. Schaefer of Moon Township, Allegheny County, in connection with the transmission line project, docketed at A-2019-3008652.<sup>1</sup> On April 29, 2019, a Prehearing Order was issued, which directed that dockets A-2019-3008589 and A-2019-300652 be consolidated for the purposes of discovery, litigation and decision. The Prehearing Order also provided that formal protests and petitions to intervene must be filed in accordance with 52 Pa.Code (relating to public utilities) on or before May 29, 2019. As of the date of this memorandum, Duquesne Light has not been served with any protest or interventions in this matter.

The Project is required to replace aging transmission system infrastructure in the BI-Crescent corridor, which contains some of Duquesne Light’s oldest in-service steel lattice towers. Structural evaluations have determined that the structures are approaching end of useful life, beyond permanent repair, and require replacement. The proposed Project involves the rebuild of the double-circuit BI – Crescent 138 kV Transmission Line that will extend approximately 14.5 miles between the Brunot Island Substation in the City of Pittsburgh and the Crescent Substation in Crescent Township, the line will tie into the Montour, Sewickley, and Neville Substations along its route.

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<sup>1</sup> Separate but concurrently, the Company submitted the Petition of Duquesne Light Company for Waiver of Provisions of the Pennsylvania Public Utility Commission’s Regulations at 52 Pa. Code § 57.71 et seq., for the Siting and Construction of Six Structures on an Existing Transmission Line, docketed at P-2019-3008604 (“Waiver Petition”) to allow Duquesne Light to replace six structures on an existing high voltage transmission line that were impacted by landslides in the spring of 2018. The Waiver Petition has been assigned to the Commission’s Law Bureau, and will be separately adjudicated.

## II. ISSUES

Duquesne Light published notice of this prehearing conference, pursuant to the Prehearing Conference Order, in the newspaper of general circulation, namely, the Pittsburgh Post-Gazette, on April 15, 2019 and April 24, 2019. Duquesne Light is not aware of any actual or potential intervenors. In the absence of adverse parties, there is no need for an evidentiary hearing before an Administrative Law Judge. Duquesne Light respectfully requests that this matter be assigned to the Commission's Bureau of Technical Utility Services. To the extent that other parties intervene in this proceeding, and such interventions necessitate the establishment of a procedural schedule, Duquesne Light will work with any parties to develop a schedule.

## III. WITNESSES

In the unlikely event a hearing occurs, Duquesne Light will provide the testimonies of the below witnesses, as may be necessary.

<b>Witness</b>	<b>Subjects Addressed</b>
Jason A. Harchick General Manager, System Planning and Protection Duquesne Light Company 2839 New Beaver Avenue Pittsburgh, PA 15233	Need for the Project Description of the Project
Aimee Kay Environmental Manager in the Power Delivery – Environmental Services Market Sector GAI Consultants, Inc. 385 E. Waterfront Drive, Homestead, PA 15120	Summary of the Siting Study Selection of the Proposed Routes for the Project
Meenah Shyu Manager of Civil & Transmission Line Engineering Group Duquesne Light Company 2841 New Beaver Avenue Pittsburgh, PA 15233	Design and Safety Features of the Project

Lesley Gannon Senior Manager, Real Estate & Rights-of-Way Duquesne Light Company 1800 Seymour Street Pittsburgh, PA 15233	Rights-of-Way Identification and Condemnation Application of the Shaefer Property
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Duquesne Light reserves the right to call additional witnesses, as necessary. If Duquesne Light determines an additional witness or witnesses will be necessary for any portion of its case, the Presiding Officer and all parties of record will be notified promptly.

**IV. EVIDENCE**

Duquesne Light will rely on the direct, rebuttal, and surrebuttal testimony of its witnesses. Duquesne Light will also rely on the testimony of the other parties to the proceeding, if any. Duquesne Light will present relevant exhibits to support its own testimony, including but not limited to, materials obtained from other parties, if any, through discovery and cross-examination.

**V. PROCEDURAL RULES / DISCOVERY**

Duquesne Light is not requesting any modification of the Commission’s procedural rules regarding discovery are necessary at this time. Duquesne Light agrees to cooperate with the parties regarding any requested modification to the Commission’s procedural discovery rules.

**VII. SERVICE ON DUQUESNE LIGHT**

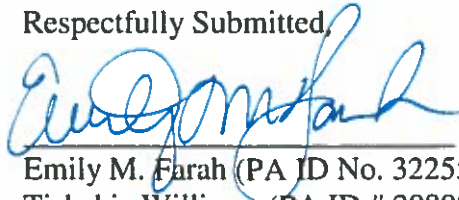
Duquesne Light will be represented in this case by the counsel named below. Copies of all documents should be served on Duquesne Light as follows:

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Tishekia Williams  
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Respectfully Submitted,



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Date: June 3, 2019

Attorneys for Duquesne Light Company