

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Letter of Notification of Duquesne Light :
Company, Filed Pursuant to 52 Pa. Code :
Chapter 57 Subchapter G, for Expedited : Docket No. A-2013-_____
Approval of the Reconfiguration, :
Reconductoring, and Construction of New :
Tie Lines for Existing Transmission Lines :
in Boroughs of Dravosburg, West Mifflin, :
and Jefferson Hills, Allegheny County and :
Union Township, Washington County, :
Pennsylvania. :

LETTER OF NOTIFICATION

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Duquesne Light Company (“Duquesne Light”), hereby files, pursuant to 52 Pa. Code § 57.72(d), this Letter of Notification to request that the Pennsylvania Public Utility Commission (“Commission”) approve the reconfiguration and reconductoring of certain existing transmission lines in the Boroughs of Dravosburg, West Mifflin, and Jefferson Hills, Allegheny County and Union Township, Washington County, Pennsylvania (the “Project”). The Project involves the reconductoring of approximately 5.2 miles of existing transmission lines and the installation of approximately 0.3 miles of new 138 kV conductors using the existing tower structures within the existing right-of-way.¹ Construction of the Project is scheduled to begin in September 2013, to support a final in-service date of June 1, 2015. Duquesne Light therefore requests that the

¹ Although a total of five new structures are required for the Project, all five structures will be located entirely on existing Duquesne Light-owned property at substation sites. No new structures will be installed within the right-of-way.

Commission consider this Letter of Notification on an expedited basis. In support thereof, Duquesne Light states as follows:

I. INTRODUCTION

1. This Letter of Notification 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 address is as follows:

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3. Duquesne Light's attorneys are:

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

4. Duquesne Light furnishes electric service to approximately 588,000 customers throughout its certificated service territory, which includes portions of Allegheny and Beaver

Counties and encompasses approximately 817 square miles in western Pennsylvania. Duquesne Light is a “public utility” and an “electric distribution company” as defined in Sections 102 and 2803 of the Pennsylvania Public Utility Code, 66 Pa.C.S. §§ 102, 2803.

5. Duquesne Light owns approximately 677 miles of transmission lines operating at 69 kV (kilovolts) or higher, and approximately 8,210 miles of distribution lines operating at less than 69 kV.

6. In order to resolve identified reliability violations, Duquesne Light plans to upgrade the existing Wilson 69-23 kV Substation (“Wilson Substation”) for 138 kV operation, reconfigure its existing transmission system to bypass the Elrama 138-69 kV Substation (“Elrama Substation”) located at the Elrama Power Plant, and convert existing 69 kV facilities to 138 kV operation.

7. Given that all transmission line work will occur within the existing right-of-way using existing transmission facilities, that no new facilities or towers will be installed within the existing right-of-way, and the presence of other transmission facilities in the area, it is anticipated that the Project will have no material impact on the area.

8. This Letter of Notification includes the following accompanying attachments:

Attachment 1	One-line Diagram of Existing Facilities
Attachment 2	Aerial Map of Existing Facilities
Attachment 3	One-line Diagram of Proposed Facilities
Attachment 4	Aerial Map of Proposed Facilities
Attachment 5a	One-line Diagram of Existing Z-11 Elrama-Mitchell 138 kV Circuit
Attachment 5b	One-line Diagram of Proposed Z-11 Mitchell-Wilson 138 kV Circuit

Attachment 6a	One-line Diagram of Reconfigured Z-11 Mitchell-Wilson 138 kV Circuit
Attachment 6b	One-line Diagram of Proposed Reconductored Z-11 Mitchell-Wilson 138 kV Circuit
Attachment 7a	One-line Diagram of Existing 66163 Elrama-Dravosburg and 66166 Wilson-Dravosburg 69 kV Circuits
Attachment 7b	One-line Diagram of Proposed Z-72 Dravosburg-Wilson 138 kV Circuit
Attachment 8a	One-line Diagram of Existing Z-13 Elrama-West Mifflin and Z-17 Elrama-Bethel Park 138 kV Circuits
Attachment 8b	One-line Diagram of Proposed Z-13 West Mifflin-Wilson and Z-17 Bethel Park-Wilson 138 kV Circuits
Attachment 9a	One-line Diagram of Existing Z-16 Elrama-Piney Fork and Z-18 Elrama-Clairton 138 kV Circuits
Attachment 9b	One-line Diagram of Proposed Z-16 Piney Fork-Clairton 138 kV Circuit
Attachment 10a	One-line Diagram of Existing Z-73 Dravosburg-West Mifflin 138 kV Circuit
Attachment 10b	One-line Diagram of Upgraded Z-73 Dravosburg-West Mifflin 138 kV Circuit
Attachment 11	Cross Section of Typical Transmission Line Right-of-Way
Attachment 12	List of Governmental Agencies

9. This Letter of Notification and accompanying Attachments, which are incorporated herein by reference, contain all the information required by 52 Pa. Code § 57.72(d)(4).

II. THE PROJECT

A. NEED FOR THE PROJECT

1. Transmission Planning

10. 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.

11. PJM Interconnection, L.L.C. (“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.

12. 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.

13. For non-bulk electric system (“non-BES”), transmission facilities operating at less than 100 kV, system reliability violations, Duquesne Light is responsible for identifying the reliability violations and correcting any violations to meet its own reliability and planning guidelines. Additionally, Duquesne Light’s 69 kV facilities are PJM tariff facilities and are monitored by PJM.

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. Duquesne Light's reliability and planning standards were developed from and are consistent with the NERC and PJM mandatory reliability standards.²

15. Duquesne 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. Duquesne Light undertakes an independent analysis of both its bulk electric system ("BES") transmission facilities, which include transmission facilities operated at voltages of 100 kV or higher, and its non-BES transmission system facilities, which include transmission and distribution facilities that operated at voltages less than 100 kV, to ensure that these facilities meet its reliability and planning standards. Based upon this analysis, Duquesne Light determined that the proposed Project is necessary to resolve certain violations of Duquesne Light's planning criteria on the 69 kV systems serving customers in Allegheny County.

17. The Project was presented before stakeholders at the PJM Western Sub-Regional RTEP meeting, approved by the PJM Board, and included in the 2012 RTEP Report as a series of baseline projects.³ PJM relies on and incorporates the approved baseline projects in its annual RTEP analysis of the electric transmission system under its functional control. In other words,

² Duquesne Light's reliability and planning standards are set forth in its FERC Form No. 715 annual report.

³ PJM RTEP baseline project numbers b2174.1 through b2174.7.

PJM assumes that the approved baseline projects are in-service when analyzing whether there are any reliability or planning violations.

2. Existing System

18. The Elrama Power Plant is a coal-fired power station with a 460 MW (megawatt) generating capacity located in Union Township, Washington County. The Elrama Power Plant currently is owned by NRG Energy, Inc. (“NRG”). In February 2012, it was announced that the Elrama Power Plant would be permanently retired on March 1, 2014.

19. Presently, there are eight substations that are served by transmission lines interconnected with the Elrama Power Plant: the Elrama, West Mifflin, Wilson, and Dravosburg Substations owned by Duquesne Light; the Mitchell, Bethel Park, and Piney Fork Substations owned by FirstEnergy Corporation (“FirstEnergy”); and the customer-owned U.S.X. Clairton Substation.

20. The Duquesne Light-owned Elrama Substation is a 138-69 kV substation is located at the deactivated Elrama Power Plant.⁴

21. Presently, there are nine transmission lines that terminate at the Elrama Substation, three 69 kV transmission lines and six 138 kV transmission lines. A one-line diagram of existing facilities is provided as Attachment 1 to this Letter of Notification.

22. Six of the circuits that terminate at the Elrama Substation share a common 255-foot wide right-of-way that extends from the Elrama Power Plant to the Dravosburg Substation. The remaining three circuits occupy two 85-foot wide rights-of-way that interconnect with facilities that are owned and operated by subsidiaries of FirstEnergy.

⁴ Many of the facilities necessary to operate Duquesne Light’s Elrama Substation such as the control building, station service, batteries, and a secure fence are currently owned by the generator owner as part of the power station.

23. An aerial map depicting the locations of the Elrama Substation, the connected substations, and the route of the existing transmission lines is included as Attachment 2 to this Letter of Notification. The transmission lines interconnected with the Elrama Power Plant are further explained below.

a. Elrama-Wilson-Dravosburg Circuits

24. The 66163 Elrama-Dravosburg 69 kV circuit extends approximately 5.1 miles northeast from the Elrama Substation where it spans the Wilson Substation and then continues approximately 5.2 miles northeast to the Dravosburg Substation.

25. The 66161 Elrama-Wilson 69 kV circuit extends approximately 5.1 miles northeast from the Elrama Substation where it terminates at the Wilson Substation. Between the Elrama and Wilson Substations, the 66163 Elrama-Dravosburg and 66161 Elrama-Wilson circuits are built on and occupy common 138 kV tower structures.

26. From the Wilson Substation, the 66166 Wilson-Dravosburg 69 kV circuit continues approximately 5.2 miles northeast to the Dravosburg Substation. Between the Wilson and Dravosburg Substations, the 66163 Elrama-Dravosburg and 66166 Wilson-Dravosburg 69 kV circuits are built on and occupy common 138 kV tower structures.

27. The 66163 Elrama-Dravosburg, the 66161 Elrama-Wilson, and 66166 Wilson-Dravosburg 69 kV circuits are designed and built for 138 kV operation, but currently operate at 69 kV.

b. Elrama-West Mifflin-Dravosburg Circuits

28. The 66162 Elrama-Dravosburg 69 kV circuit extends approximately 10.3 miles northeast from the Elrama Substation to the Dravosburg Substation. This circuit is designed and built for 138 kV operation, but currently operates at 69 kV.

29. The Z-13 Elrama-West Mifflin 138 kV circuit extends approximately 6.9 miles northeast from the Elrama Substation where it terminates at the West Mifflin Substation. Between the Elrama and West Mifflin Substations, the 66162 Elrama-Dravosburg 69 kV and Z-13 Elrama-West Mifflin 138 kV circuits are built on and occupy common 138 kV tower structures.

30. From the West Mifflin Substation, the Z-73 Dravosburg-West Mifflin 138 kV circuit continues approximately 2.9 miles northeast to the Dravosburg Substation. Between the West Mifflin and Dravosburg Substations, the 66162 Elrama-Dravosburg 69 kV and Z-73 Dravosburg-West Mifflin 138 kV circuits are built on and occupy common 138 kV tower structures.

c. Elrama-Clairton-Dravosburg Circuits

31. The Z-18 Elrama-Clairton 138 kV circuit extends approximately 3.8 miles northeast from the Elrama Substation to tower number 3239, and then proceeds 1.95 miles east where it terminates at the U.S.X. Clairton Substation. From the U.S.X. Clairton Substation, the Z-14 Clairton-West Mifflin 138 kV circuit proceeds west approximately 1.95 miles to tower number 3239, and then approximately 3.0 miles northeast where it terminates at the West Mifflin Substation. From the West Mifflin Substation, the Z-74 Dravosburg-West Mifflin 138 kV continues approximately 3.4 miles northeast where it terminates at the Dravosburg Substation. The Z-15 Elrama-Dravosburg 138 kV circuit extends approximately 10.3 miles northeast from the Elrama Substation where it terminates at the Dravosburg Substation.

32. The Z-18 Elrama-Clairton, Z-14 Clairton-West Mifflin, Z-74 Dravosburg-West Mifflin, and Z-15 Elrama-Dravosburg 138 kV circuits are built on and occupy common 138 kV tower structures between the Elrama and Dravosburg Substations.⁵

d. Elrama-Mitchell Circuits

33. The Z-11 Elrama-Mitchell 138 kV circuit extends approximately 4.1 miles southwest from the Elrama Substation to the FirstEnergy-owned Mitchell Substation.

34. The Z-11 Elrama-Mitchell 138 kV circuit occupies an approximately 85-foot wide right-of-way between the Elrama and Mitchell Substations.

e. Elrama-Bethel Park and Elrama-Piney Fork Circuits

35. The Z-16 Elrama-Piney Fork 138 kV circuit extends approximately 4.6 miles northwest from the Elrama Substation to the FirstEnergy-owned Piney Fork Substation.

36. The Z-17 Elrama-Bethel Park 138 kV circuit extends approximately 8.9 miles northwest from the Elrama Substation to the FirstEnergy-owned Bethel Park Substation.

37. For the first 4.84 miles from the Elrama Substation, the Z-16 Elrama-Piney Fork and Z-17 Elrama-Bethel Park 138 kV circuits are built on and occupy common 138 kV structures in an 85-foot wide right-of-way. Thereafter, the Z-16 Elrama-Piney Fork and Z-17 Elrama-Bethel Park 138 kV circuits follow FirstEnergy rights-of-way and terminate at the Piney Fork and Bethel Park Substations, respectively.

3. Reliability Violations

38. In February 2012, it was announced that the Elrama Power Plant would be permanently retired on March 1, 2014. In January 2013, Duquesne Light obtained approval from

⁵ The Z-18 Elrama-Clairton and Z-14 Clairton-West Mifflin 138 kV circuits are built on and occupy common 138 kV tower structures between tower number 3239 and the U.S.X. Clairton Substation.

FERC to terminate the interconnection agreement with NRG for the facilities interconnected with the Elrama Power Plant. As a result, Duquesne Light evaluated system conditions without the Elrama Power Plant and the need for the interconnected Elrama Substation.

39. Duquesne Light's studies revealed that, under peak conditions, the deactivation and permanent retirement of the Elrama Power Plant will result in the following load loss, low voltage, and thermal overload violations on the transmission facilities located between the Elrama and the Dravosburg Substations:

- There currently are three 138-69 kV transformers⁶ at both the Dravosburg and Elrama Substations. The loss of any two 138-69 kV transformers, an N-1-1 event,⁷ will overload the remaining 138-69 kV transformer.
- The loss of one 69 kV transformer at the Dravosburg Substation or Elrama Substation followed by the loss of one of the three existing 69 kV circuits, an N-1-1 event, results in low voltage on the area 69 kV buses.
- In addition, the tower outage of the Z-74 Dravosburg-West Mifflin 138 kV circuit and Z-15 Elrama-Dravosburg 138 kV circuit will cause the Z-73 Dravosburg-West Mifflin 138 kV circuit to exceed the summer emergency thermal rating of its conductor.

40. In addition, in February 2012, it was announced that the New Castle Power Plant units 3, 4, 5, and diesels A and B would be deactivated on April 16, 2015. As a result, Duquesne Light and PJM evaluated system conditions without the New Castle units. These studies determined that the Z-11 Elrama-Mitchell 138 kV circuit would exceed its thermal capability for N-1 events.

⁶ The transformers "step-up" or "step-down" the voltage. In this case, the 138/69 kV transformers transform the voltage from 138 kV to 69 kV and vice versa.

⁷ An N-1-1 event involves the loss of one system element followed by system readjustments, and the loss of a second system element.

B. PROPOSED SOLUTION

42. To resolve the reliability violations described above, Duquesne Light, following approval from the Commission, plans to reconfigure its existing transmission facilities that currently are interconnected with the Elrama Power Plant, upgrade the existing Wilson Substation for 138 kV operation, and convert existing 69 kV facilities to 138 kV operation.

43. The transmission work associated with the proposed Project involves: (1) extending the Z-11 Elrama-Mitchell 138 kV circuit to the Wilson Substation by converting existing 69 kV lines between the Elrama Substation and the Wilson Substation to 138 kV operation; (2) creating a Z-72 Dravosburg-Wilson 138 kV circuit from existing 69 kV circuits; (3) creating a Z-17 Bethel Park-Wilson 138 kV circuit and a Z-13 West Mifflin-Wilson 138 kV circuit from existing circuits; (4) creating the Z-16 Piney Fork-Clairton 138 kV circuit from existing circuits; (5) upgrading the Z-73 Dravosburg-West Mifflin 138 kV circuit by utilizing existing 69 kV circuits; and (6) retiring the Elrama Substation and the Z-15 Elrama-Dravosburg 138 kV circuit. The proposed transmission work is further described below.

44. The Project will resolve all the identified load loss, low voltage, and thermal overload violations. The Project was presented before stakeholders at the PJM Western Sub-Regional RTEP meeting, approved by the PJM Board, and included in the 2012 RTEP Report as a series of baseline projects.⁸

45. This Project is located in the Boroughs of Dravosburg, West Mifflin, and Jefferson Hills, Allegheny County and Union Township, Washington County, Pennsylvania. A one-line diagram of the proposed circuits is provided as Attachment 3 to this Letter of Notification. An aerial map depicting the existing and reconfigured lines is provided as

⁸ PJM RTEP baseline project numbers b2174.1 through b2174.7.

Attachment 4 to this Letter of Notification. The estimated cost of the Project is approximately \$25.6 million. This includes approximately \$4.5 million to re-conductor the Z-11 Mitchell-Wilson 138 kV line, \$3.5 million for the remaining transmission line work, \$10.7 million for the transmission substation work, and approximately \$6.9 million for the associated distribution work.

46. The transmission line work associated with this Project has a scheduled construction start date of September 2013. The work to successfully separate from the joint use facilities at Duquesne Light's Elrama Substation will be completed by March 1, 2014, and the demolition of Duquesne Light facilities at the Elrama Substation will be completed by June 1, 2014. Final completion of all 138 kV line reconfigurations interconnected with the Wilson Substation, including the demolition of the 69 kV facilities no longer required at Dravosburg Substation, will be completed by June 1, 2015.

1. Extending the Z-11 Elrama-Mitchell 138 kV Circuit to the Wilson Substation using Existing Facilities

47. The existing Z-11 Elrama-Mitchell 138 kV circuit will be extended to the Wilson Substation by constructing a 0.13 miles of new bundled 138 kV conductor within the Duquesne Light-owned Elrama Substation. The new bundled 138 kV design will utilize 795 kcmil⁹ ACSS-TW¹⁰ 20/7 conductors and one overhead optical ground wire for lightning protection and fiber optic communication capability. The new segment of bundled 138 kV conductor will require the installation of two single-circuit steel monopoles that will be 75 to 94 feet in height. These two

⁹ Wire sizes are expressed in thousands of circular mils (kcmil). A circular mil is the cross-sectional area of a wire one mil in diameter, where 1 kcmil = 0.5067 mm².

¹⁰ ACSS-TW is an aluminum conductor, steel-supported. It is designed to operate continuously at elevated temperatures without loss of strength.

structures will be installed entirely on Duquesne Light-owned property at the Elrama Substation site.

48. When connecting the existing Z-11 Elrama-Mitchell 138 kV circuit to the Wilson Substation, approximately 5.1 miles of the existing 66161 Elrama-Wilson and 66163 Elrama-Dravosburg 69 kV circuits will be reconducted with new high temperature 138 kV conductors between the Elrama and Wilson Substations using the existing tower structures.¹¹ The reconducted 138 kV design will utilize 795 kemil ACSS-TW 20/7 conductors and one overhead optical ground wires for lightning protection and fiber optic communication capability and one 7#8 alumoweld shield wire for lightning protection.

49. The shield wire on the existing Z-11 Elrama-Mitchell 138 kV circuit will be replaced with two overhead optical ground wires for lightning protection and fiber optic communication capability.

50. Upon completion, the resulting line will be renamed the Z-11 Mitchell-Wilson 138 kV circuit.

¹¹ The need to reconductor between the Elrama and Wilson Substations using new high temperature 138 kV conductors is due to the deactivation request for the New Castle units explained above. On April 30, 2013, NRG withdrew its deactivation request for the New Castle units. PJM is in the process of reevaluating the system to determine the need for specific baseline projects approved to mitigate adverse reliability conditions identified as the result of the initial deactivation request. The PJM RTEP baseline project number b1985, the reconductoring of the new Z-11 Mitchell-Wilson 138 kV circuit with new high temperature conductors, may be impacted by this re-evaluation. Duquesne Light herein is seeking Commission approval to reconductor the new Z-11 Mitchell-Wilson 138 kV circuit with new high temperature conductors. In the event that PJM withdraws this baseline project, the new high temperature conductors will no longer be needed and Duquesne Light will not reconductor the 5.1 miles of the existing 66161 Elrama-Wilson and 66163 Elrama-Dravosburg 69 kV circuits with new high temperature 138 kV conductors.

51. The modifications to the Z-11 Mitchell-Wilson 138 kV circuit will be constructed entirely within the existing right-of-way or on Duquesne Light-owned property at the Elrama Substation site. No new structures will be installed within the right-of-way.

52. One-line diagrams of the existing Z-11 Elrama-Mitchell 138 kV circuit and the proposed Z-11 Mitchell-Wilson 138 kV circuit are provided as Attachments 5a and 5b to this Letter of Notification.

53. One-line diagrams of the reconfigured Z-11 Mitchell-Wilson 138 kV circuit and the proposed reconducted Z-11 Mitchell-Wilson 138 kV circuit are provided as Attachments 6a and 6b to this Letter of Notification.

2. Creating the Z-72 Dravosburg-Wilson 138 kV Circuit using Existing Facilities

54. The existing 69 kV circuits between the Dravosburg and Wilson Substations, the 66163 Elrama-Dravosburg and 66166 Wilson-Dravosburg 69 kV circuits, are built and designed for 138 kV operation, but currently operate at 69 kV.

55. To convert these existing 69 kV circuits to 138 kV operation, approximately 150 feet of the 66166 Dravosburg-Wilson 69 kV circuit between the Dravosburg Substation and tower number 3002 will be reconducted with bundled 795 kcmil ACSS-TW 20/7 138 kV conductors.¹² In addition, approximately 150 feet of the 66166 Dravosburg-Wilson 69 kV circuit between the Wilson Substation and tower 3030 will be reconducted with bundled 795 ACSS-TW 20/7 138 kV conductor.

56. The reconducted 138 kV bundled segments will be connected with existing conductors between tower numbers 3002 to 3030. The operating voltage of these existing

¹² The segment of the 66163 Elrama-Dravosburg 69 kV circuit between the Dravosburg Substation and tower number 3002 will be de-energized.

conductors will be increased to 138 kV without the requirement for any additional reconductoring or transmission line work.

57. Upon completion, the resulting line will be renamed the Z-72 Dravosburg-Wilson 138 kV circuit. The Z-72 Dravosburg-Wilson 138 kV circuit will be constructed entirely with the existing right-of-way using the existing tower structures.

58. One-line diagrams of the existing 66163 Elrama-Dravosburg and 66166 Wilson-Dravosburg 69 kV circuits and the proposed Z-72 Dravosburg-Wilson 138 kV circuit are provided as Attachments 7a and 7b to this Letter of Notification.

3. Creating the Z-17 Bethel Park-Wilson 138 kV Circuit and the Z-13 West Mifflin-Wilson 138 kV Circuit using Existing Facilities

59. The proposed Z-17 Bethel Park-Wilson 138 kV circuit and Z-13 West Mifflin-Wilson 138 kV circuit will combine the existing Z-17 Elrama-Bethel Park 138 kV circuit with the existing Z-13 Elrama-West Mifflin 138 kV circuit, which will be split and tied into the Wilson Substation.

60. The existing Z-13 Elrama-West Mifflin 138 kV circuit will be split at the Wilson Substation. This will require the construction of two new single-circuit steel monopoles, tower numbers 3130-1 and 3131-1 that will be 105 feet in height. These structures will be installed entirely on Duquesne Light-owned property at the Wilson Substation site.

61. The existing Z-13 Elrama-West Mifflin 138 kV circuit will be tied into the Wilson Substation by installing approximately 250 feet of new 138 kV conductor that will proceed north from the Wilson Substation to tower number 3130 where it will connect with the existing bundled Z-13 Elrama-West Mifflin 138 kV circuit and continue to the West Mifflin Substation using the existing 138 kV conductor and tower structures. Upon completion, this circuit will be renamed the Z-13 West Mifflin-Wilson 138 kV circuit.

62. The existing Z-13 Elrama-West Mifflin 138 kV circuit also will be tied into the Wilson Substation by installing approximately 250 feet of new 138 kV conductor that will proceed south from the Wilson Substation to tower number 3131 where it will connect with the existing bundled Z-13 Elrama-West Mifflin 138 kV circuit and continue south to tower number 3158 using the existing conductor and tower structures. Approximately 150 feet of new 138 kV conductor will be installed from tower number 3158 to tower number 3458 where it will connect to the existing Z-17 Elrama-Bethel Park 138 kV circuit, using the existing tower structures. Upon completion, this circuit will be renamed the Z-17 Bethel Park-Wilson 138 kV circuit.

63. The new portions of the Z-13 West Mifflin-Wilson and Z-17 Bethel Park-Wilson 138 kV lines will utilize 795 kcmil ACSS-TW 20/7 conductors installed entirely within the existing right-of-way and on Duquesne Light-owned property at the Wilson Substation site.

64. One-line diagrams of the existing Z-13 Elrama-West Mifflin and Z-17 Elrama-Bethel Park 138 kV circuits and the proposed Z-13 West Mifflin-Wilson and Z-17 Bethel Park-Wilson 138 kV circuits are provided as Attachments 8a and 8b to this Letter of Notification.

4. Creating the Z-16 Piney Fork-Clairton 138 kV Circuit using Existing Facilities

65. To create the proposed Z-16 Piney Fork-Clairton 138 kV circuit, the existing Z-16 Elrama-Piney Fork and Z-18 Elrama-Clairton 138 kV circuits will be combined by installing approximately 120 feet of new 138 kV conductor from tower number 3456 for the existing Z-16 Elrama-Piney Fork 138 kV circuit to tower number 3256 for the existing Z-18 Elrama-Clairton 138 kV circuit.

66. The new 138 kV conductor between these towers will utilize 853.7 kcmil ACAR¹³ 24/7 conductors. The line will not require any new structures and will be installed entirely within the existing right-of-way, using the existing structures.

67. Upon completion, the resulting line will be renamed the Z-16 Piney Fork-Clairton 138 kV circuit.

68. One-line diagrams of the existing Z-16 Elrama-Piney Fork and Z-18 Elrama-Clairton 138 kV circuits and the proposed Z-16 Piney Fork-Clairton 138 kV circuit are provided as Attachments 9a and 9b to this Letter of Notification.

5. Upgrading the Z-73 Dravosburg-West Mifflin 138 kV Circuit using Existing Facilities

69. The existing 66162 Elrama-Dravosburg 69 kV circuit will be converted to 138 kV operation and tied into the West Mifflin Substation. This section from the Dravosburg Substation to tower number 3102 (approximately 150 feet) will be reconducted with 138 kV bundled 795 ACSS-TW 20/7 conductors, where it will connect with the existing Z-73 Dravosburg-West Mifflin 138 kV circuit and 66162 Elrama-Dravosburg 69 kV circuit¹⁴ and continue to tower number 3119 using the existing conductors.

70. Approximately 920 feet (approximately 740 feet reconducted and approximately 180 feet of new conductors) of 138 kV bundled 795 ACSS-TW 20/7 conductors will be installed between tower number 3119 and the West Mifflin Substation. This will require the construction of one new double-circuit steel monopole that will be 75 feet in height. This structure will be installed entirely on the Duquesne Light-owned property at the West Mifflin Substation site.

¹³ ACAR is an aluminum conductor, alloy reinforced.

¹⁴ The segment of the Elrama-Dravosburg 69 kV circuit that extends from the Dravosburg Substation to tower number 3102 will be de-energized.

71. Upon completion, the resulting line will retain its existing name, the Z-73 Dravosburg-West Mifflin 138 kV circuit, with an increased rated thermal capacity.

72. The conductors of the existing 66162 Elrama-Dravosburg 69 kV circuit between tower numbers 3119 and 3120 will be removed and the remaining conductors will be de-energized.

73. One-line diagrams of the existing and upgraded Z-73 Dravosburg-West Mifflin 138 kV circuit are provided as Attachments 10a and 10b to this Letter of Notification.

6. Retiring the Elrama Substation and the Z-15 Elrama-Dravosburg 138 kV Circuit

74. All Duquesne Light-owned facilities at the Elrama Substation will be taken out of service and/or removed. The only facilities that will remain energized at the Elrama switchyard property are those necessary to support the new Z-11 Mitchell-Wilson 138 kV circuit described above. *See* Section II,B.1.

75. All of the 138 kV and 69 kV connections to the Elrama Power Station will be taken out of service and/or removed.

76. Upon completion of the 138 kV substation and transmission line work described above, the Z-15 Elrama-Dravosburg 138 kV circuit will no longer be needed and, as a result, will be de-energized until load growth in the area makes it appropriate to place the circuit back in service.

III. HEALTH AND SAFETY

77. The Project will be designed, constructed, operated, and maintained in a manner that meets or surpasses all applicable National Electric Safety Code minimum standards and all applicable legal requirements.

78. The Project will conform to Duquesne Light's design criteria, construction standards, and safety practices.

79. No communication towers, pipelines, or other utilities will be adversely affected by the reconfigured and reconductored transmission lines.

80. The closest airport is the Allegheny County Airport, which is a public airport, located approximately one mile from the project site. Impacts to this airport are not expected due the location of the project in relation to the orientation of the runways and the presence of other transmission facilities in the area.

IV. RIGHT-OF-WAY STATUS

81. In total, this Project will require the reconductoring of approximately 5.2 miles of existing transmission lines and the construction of approximately 0.3 miles of new 138 kV conductors using the existing 138 kV tower structures within the existing right-of-way.

82. The Project will take place entirely within the existing right-of-way that extends from the Elrama Substation to the Dravosburg Substation. Therefore, it is anticipated that the proposed Project will have no material impact on the area.

83. The right-of-way currently contains three parallel double circuit 138 kV tower structures. A cross-sectional diagram showing the typical arrangement of the three tower structures is provided as Attachment 11 to the Letter of Notification. The average width of the right-of-way is approximately 255 feet. The existing center line right-of-way allows for the reconstruction and reconductoring without the need for additional right-of-way. No new towers or structures will be constructed within the right-of-way.¹⁵

¹⁵ Although a total of five new steel monopole structures are required for the Project, all five structures will be located on existing Duquesne Light-owned property at the substation sites.

84. Duquesne Light will file a revised permit with the Pennsylvania Turnpike Commission for the Z-11 Mitchell-Wilson 138 kV line crossing of State Route PA43.

85. The Project will not affect any unique geological, scenic, or natural areas because the entire Project will be completed using the existing right-of-way and tower structures.

V. NOTICE

86. Copies of this Letter of Notification are being served on the agencies listed in Attachment 12 in accordance with 52 Pa. Code § 57.72(d)(3).

87. In addition, all landowners that may be affected by the transmission line work associated with the Project will be served with a copy of this Letter of Notification.

VI. LETTER OF NOTIFICATION

88. Duquesne Light is proceeding by means of a Letter of Notification, instead of a full Application, pursuant to the Commission's regulations at 52 Pa. Code § 57.72(d).

89. In total, this Project will require the reconductoring of approximately 5.2 miles of existing transmission lines and the construction of approximately 0.3 miles of new 138 kV conductors using the existing 138 kV tower structures within the existing right-of-way.

90. The transmission line work associated with this Project qualifies for use of a Letter of Notification because the entire Project will be constructed entirely within the existing right-of-way and/or on property that is owned in fee by Duquesne Light, no new structures or facilities will be installed within the existing right-of-way, and the reconfigured and reconducted lines will not substantially alter the existing right-of-way.

91. The existing rights-of-way and easements for the existing 138 kV and 69 kV transmission lines over the affected properties provide the necessary property rights to reconfigure and reconductor the existing circuits without the need for additional right-of-way.

92. This Letter of Notification is filed on the date set forth below. As provided in 52 Pa. Code § 57.72(d)(5), the Commission will review and, by order, approve or disapprove this Letter of Notification. If the Commission approves this Letter of Notification, the Project will be constructed as proposed herein without the formal application process set forth at 52 Pa. Code §§ 57.71, *et seq.*

VII. REQUEST FOR EXPEDITED CONSIDERATION

93. Duquesne Light further requests that the Commission consider this Letter of Notification on an expedited basis. Timely approval of this Letter of Notification is important for several reasons.

94. As explained above, the Project is required to resolve the identified reliability violations.

95. In January 2013, Duquesne Light obtained approval from FERC to terminate the interconnection agreement for its facilities interconnected with the Elrama Power Plant. As a result, Duquesne Light will disconnect its facilities from the Elrama Power Plant by February 2014. Expedited approval of this Letter of Notification will help Duquesne Light achieve this milestone.

96. In order to ensure that Duquesne Light's facilities are disconnected from the Elrama Power Plant by February 2014, construction of the Project is scheduled to begin in September 2013, or as soon as practical following receipt of the Commission's approval. The final in-service date of for the entire Project is June 1, 2015.


97. Duquesne Light therefore requests that the Commission direct that protests and interventions to this Letter of Notification be filed within 10 days from the date of publication to support expedited treatment of this Letter of Notification.

VIII. CONCLUSION

WHEREFORE, Duquesne Light Company respectfully requests that the Pennsylvania Public Utility Commission (1) consider this Letter of Notification on an expedited basis, and (2) approve the reconfiguration and reconductoring of certain existing transmission lines in the Boroughs of Dravosburg, West Mifflin, and Jefferson Hills, Allegheny County and Union Township, Washington County, Pennsylvania that is explained above and in the Attachments hereto.

Respectfully submitted,

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Date: June 7 2013

Attorneys for Duquesne Light Company

VERIFICATION

I, Michelle S. Antantis, PE, being a principal engineer at Duquesne Light Company, 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 that Duquesne Light Company 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: June 5, 2013

Michelle S Antantis

Mary Jane Hammer
Notary Public

