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File #: 157920

January 22, 2014

VIA ELECTRONIC FILING

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: Petition of Duquesne Light Company for Waiver of Certain Provisions of the Pennsylvania Public Utility Commission's Regulations at 52 Pa. Code § 57.71 et seq., for the Siting and Relocation of Existing Transmission Facilities in Brighton, Vanport, Potter, and Center Townships, Beaver County, Pennsylvania to Accommodate a Potential New Industrial Facility - Docket No. P-2014-

Dear Secretary Chiavetta:

Enclosed for filing is Duquesne Light Company's Petition for Waiver in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Christopher T. Wright

CTW/jl
Enclosures

cc: Certificate of Service
Robert F. Young
Paul T. Diskin
Nicholas Okoro
Anthony J. Rametta
Kimberly Hafner

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **Petition for Waiver** 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

Pennsylvania Historical and
Museum Commission
Bureau of Historic Preservation
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120-0053
Attn: Mr. Douglas C. McLearn, Chief

GSC Real Estate, LP
670 State Avenue
Vanport, PA 15009

Grimes, Lloyd & Karen O'Neill
2519 Mill Street
Aliquippa, PA 15001

Honorable Barry Schoch, P.E., Secretary
Pennsylvania Department of Transportation
C/O Office of Chief Counsel
Commonwealth Keystone Building
400 North Street, 9th Floor
Harrisburg, PA 17120
Attn: William J. Cressler

Pennsylvania Lines LLC
c/o Norfolk Southern Corp
110 Franklin Road SE
Roanoke, VA 24042

Interstate Chemical Company Inc.
2797 Freedland Road
West Middlesex, PA 16159

Department of Environmental Protection
PO Box 2063
Market Street State Office Building
Harrisburg, PA 17105-2063
Attn: Office of Field Operations

Jochar Corp.
c/o Paul Cirillo
2797 Freedland Road
Hermitage, PA 16148

Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923

Peoples Natural Gas Company
2 Gateway Center
Pittsburgh, PA 15222

Office of Small Business Advocate
Commerce Building
300 North Second Street, Suite 1102
Harrisburg, PA 17101

Michael A. Dobish &
Cherie L. Zercher
119 Ornida Drive
Beaver, PA 15009

Bureau of Investigation & Enforcement
PO Box 3265
Commonwealth Keystone Building
400 North Street, 2nd Floor West
Harrisburg, PA 17105-3265

Associated Medical Specialist
114 Woodlawn Drive
Beaver, PA 15009

Gerald J. & Eddi K. Matthews
560 McIntyre Drive
Beaver, PA 15009

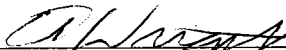
Caryl M. & George E. Belich
2 Pleasant Grove Drive
Beaver Falls, PA 15010

Caryl M. Belich
2 Pleasant Grove Drive
Beaver Falls, PA 15010

Drug and Alcohol Services of Beaver
Valley, Inc.
697 State Street
Vanport, PA 15009

Sunoco Partners Marketing Term LP
c/o Ten Penn Center – Property Tax
1801 Market Street
Philadelphia, PA 19102

Date: January 22, 2014



Christopher T. Wright

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light Company for :
Waiver of Certain Provisions of the :
Pennsylvania Public Utility Commission’s : Docket No. P-2014-_____ :
Regulations at 52 Pa. Code § 57.71 *et seq.*, :
for the Siting and Relocation of Existing :
Transmission Facilities in Brighton, :
Vanport, Potter, and Center Townships, :
Beaver County, Pennsylvania to :
Accommodate a Potential New Industrial :
Facility :

PETITION FOR WAIVER

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Duquesne Light Company (“Duquesne Light”) hereby files this Petition for Waiver, pursuant to 52 Pa Code §§ 5.43 and 57.72(e), seeking a waiver of certain of the Pennsylvania Public Utility Commission’s (“Commission”) regulations governing the review and approval of the siting and construction of high voltage electric transmission lines set forth at 52 Pa. Code §§ 57.71 *et seq.* A potential new customer currently is evaluating the feasibility of constructing a new major industrial plant in Duquesne Light’s service territory. The potential new customer has requested that certain of Duquesne Light’s existing transmission lines be relocated (“Potential Project”) to accommodate the construction of a proposed new industrial plant. Importantly, construction of the proposed new industrial plant cannot be completed until the existing transmission lines on the industrial plant site are relocated. Additionally, Duquesne

Light will not relocate the existing transmission lines if the new customer does not proceed with its plans to construct the proposed new industrial plant.

Based on preliminary, estimated engineering figures, the Potential Project would require approximately 2.5 miles of existing double circuit 138 kV transmission lines to be relocated in Brighton, Vanport, Potter, and Center Townships, Beaver County, Pennsylvania.¹ Approximately 1.7 miles of the relocated 138 kV transmission lines would be located solely on the property of the new potential customer, approximately 0.4 miles of the relocated transmission lines would be located within new right-of-way to be acquired by Duquesne Light, and approximately 0.4 miles of the relocated transmission lines will be a river crossing of the Ohio River. Although the Potential Project does not meet the strict definition of any one of the circumstances in which a Letter of Notification may be used, it nearly fits within several of the circumstances for which a Letter of Notification may be used in lieu of an Application.

In order to relocate the existing 138 kV transmission facilities, Duquesne Light will, in the near future, submit an appropriate filing with the Commission seeking approval for the siting and construction of the Potential Project. Importantly, Duquesne Light is not herein seeking approval to site and construct the Potential Project. Rather, the sole purpose of this Petition for Waiver is to determine the type of filing that Duquesne Light should submit to the Commission - a Letter of Notification under 52 Pa. Code Pa. Code § 57.72(d) or a full Application under 52

¹ The Potential Project also would require approximately 2.0 miles of existing single circuit 69 kV transmission lines to be relocated. Where possible, the 69 kV transmission line will be relocated to occupy the same right-of-way as the relocated 138 kV transmission lines. Duquesne Light has no plans in the foreseeable future to operate the relocated 69 kV lines at 138 kV. Because Duquesne Light does not need Commission approval to site, construct, or relocate transmission lines operating at less than 100 kV, 52 Pa. Code § 57.71, the 69 kV transmission line is not the subject of this Petition for Waiver or any future filing seeking Commission approval of the siting and construction of the Project but has been included for informational purposes only.

Pa Code §§ 57.71(a)-(c) -- if and when it becomes necessary in the future to seek Commission approval of the siting and construction of the Potential Project. All parties potentially affected by the Potential Project will be served with the future filing, if and when it becomes necessary, and will have the full opportunity to participate in that future proceeding if and when it becomes necessary.

For the reasons explained below, Duquesne Light submits that the Potential Project is eligible for a waiver from the requirements of a full Application under 52 Pa Code §§ 57.71(a)-(c), and that it is appropriate and reasonable for the Potential Project to be filed as a Letter of Notification under 52 Pa. Code Pa. Code § 57.72(d) if it and when it becomes necessary in the future to seek Commission approval of the siting and construction of the Project.

I. INTRODUCTION

1. This Petition for Waiver 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:

Duquesne Light Company
411 Seventh Avenue
Pittsburgh, PA 15219

3. Duquesne Light's attorneys are:

Robert H. Hoaglund (ID # 313383)
Assistant General Counsel
Duquesne Light Company
411 Seventh Avenue, 16th Floor
Pittsburgh, PA 15219
Phone: 412-393-1058
Fax: 412-393-5757
E-mail: rhoaglund@duqlight.com

David B. MacGregor (Bar I.D. #28804)
Christopher T. Wright (Bar I.D. # 203412)
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
Voice: 717.731.1970
Fax: 717.731.1985
E-mail: dmacgregor@postschell.com
E-mail: cwright@psotschell.com

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

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. This Petition for Waiver includes the following accompanying attachments:

- Attachment 1 Aerial Map of Existing Facilities
- Attachment 2 Aerial Map of Relocated Line – Diagonal River Crossing
- Attachment 3 Land Owners Within Proposed Rights-of-Way

7. This Petition for Waiver and accompanying Attachments, which are incorporated herein by reference, contain all the information required by 52 Pa Code §§ 5.43 and 57.72(e).

II. PETITION FOR WAIVER

A. OVERVIEW

8. The purpose of this Petition for Waiver is to obtain from the Commission such waivers as are necessary or appropriate to permit Duquesne Light to proceed by means of a Letter of Notification for the potential siting and relocation of existing 138 kV transmission lines in Brighton, Vanport, Potter, and Center Townships, Beaver County, Pennsylvania. Given that the purpose of the Potential Project is to accommodate the interconnection of a potential new customer and the fact that the majority of the proposed route will be located on the property of

the new customer, the use of a Letter of Notification will provide all the information necessary for the Commission and interested parties to fully review and determine whether the Project should be approved.

9. Further, the use of a Letter of Notification will permit Duquesne Light to complete the filings required for approval in a much shorter period of time than would be required to prepare a complete siting application for the Potential Project. Importantly, construction of the potential new industrial plant cannot be completed until after the existing 138 kV and 69 kV transmission lines have been relocated around the proposed site for the potential new industrial plant. Regulatory review in a shorter period of time will enable Duquesne Light to complete construction of the Potential Project and maintain the construction and in-service dates without jeopardizing or otherwise delaying the construction schedule required for the potential new industrial plant.

10. As explained below, based on the preliminary engineering estimates, the Potential Project would require approximately 2.5 miles of existing double circuit 138 kV transmission lines to be relocated.² The Potential Project can be separated into three distinct components.

11. The first component of the Potential Project requires the relocation of approximately 1.7 miles of the existing 138 kV transmission lines solely on the property of the potential new industrial plant to be owned and operated by the new customer.

12. The second component of the Potential Project is the relocation of approximately 0.4 miles of 138 kV transmission lines within new rights-of-way to be acquired by Duquesne Light.

² See Footnote 1, *supra*.

13. The third component of the Potential Project is the relocation of approximately 0.4 miles of 138 kV transmission lines within a river crossing of the Ohio River. The proposed river crossing will reduce the total number of existing river crossings by relocating the existing 138 kV line and 69 kV lines (as well the existing distributions lines), which currently occupy separate river crossings, within the same river crossing of the Ohio River.

14. Because approximately 1.7 miles of the Potential Project will be constructed entirely on the property of the new potential customer, approximately 0.4 miles of the Potential Project will be constructed within right-of-way or land to be purchased by Duquesne Light, and approximately 0.4 miles will be constructed within a river crossing, Duquesne Light submits that the most practical and efficient method to obtain Commission review and approval for the siting of the Potential Project is a Letter of Notification under 52 Pa. Code Pa. Code § 57.72(d) rather than a full Application under 52 Pa Code §§ 57.71(a)-(c). The use of a Letter of Notification will provide all the information necessary for the Commission and interested parties to fully review and determine whether the Potential Project should be approved.

15. The Commission's regulation at 52 Pa. Code § 57.72(d) sets forth the circumstances under which an electric public utility may seek Commission approval for the siting and construction of a proposed high voltage transmission line by means of a Letter of Notification instead of a full Application as follows:

(d) Letter of notification in lieu of Application:

(1) A Letter of Notification may be filed with the commission in lieu of the Application process set forth in §§ 57.71 – 57.76 for the following:

(i) An HV line which is proposed to be located entirely on an existing transmission line right-of-way, so long as the size, character design, or configuration of the proposed HV line does not substantially alter the right-of-way.

(ii) An HV line which is proposed to be located entirely within a public road.

(iii) An HV line which is proposed to be located entirely within the applicant's existing transmission line right-of-way and the property of the sole customer to be served by the line, so long as the size, character, design, or configuration of the proposed line does not substantially alter the right-of-way.

(iv) A line for which the voltage is proposed to be increased above its present levels, so long as the size, character, design or configuration of the proposed line does not substantially alter the right-of-way.

(v) An HV line which is to be reconductored or reconstructed so long as the size, character, design or configuration of the proposed line does not substantially alter the right-of-way.

(vi) An HV line having a proposed route of 2 miles or less.

52 Pa Code § 57.72 (d).

16. As proposed, the Potential Project does not meet the strict definition of any one of the circumstances in which a Letter of Notification may be used, as set forth above. The Potential Project, however, nearly fits within several of the circumstances in which a Letter of Notification may be used in lieu of an Application. Duquesne Light is requesting a waiver of the strict Application of the aforementioned regulations to allow Duquesne Light to file a Letter of Notification in lieu of an application for Commission review and approval to site and construct the Potential Project.

17. The Commission's Rules of Administrative Practice and Procedure at 52 Pa. Code § 5.43 allow for petitions for waiver of any of the Commission's regulations. More specifically, the Commission's transmission line siting regulations at 52 Pa. Code § 57.72(e) specifically permit petitions to request that portions of these specific siting regulations be waived. It states:

(e) The Commission or the presiding officer may — upon the petition of any party, upon the Commission's own motion, or upon the presiding officer's own motion — waive one or more or all of

the requirements in this subchapter. The petition shall clearly state the requirements sought to be waived and the reasons therefor.

52 Pa. Code § 57.72(e).

18. Duquesne Light respectfully requests a waiver of the strict application of 52. Pa Code §57.72(d)(1) to permit Duquesne Light to seek approval of the siting and construction of Potential Project, if and when necessary to potentially accommodate a new industrial plant proposed by a new customer in Beaver County.

B. PURPOSE OF THE POTENTIAL PROJECT

19. A potential new customer currently is evaluating the feasibility of constructing a new major industrial plant in Duquesne Light's service territory in Beaver County.

20. The proposed site for the potential new industrial plant currently is traversed by Duquesne Light's Valley-Raccoon (Z-81/Z-83) 138 kV Transmission Lines.³ A diagram depicting the current location of the existing facilities is attached hereto as Attachment 1.

21. The potential new customer has requested that the Duquesne Light existing transmission lines, which currently traverse the proposed site for the potential new industrial plant, be relocated to the eastern and southern perimeter of the proposed facility site to accommodate the construction of the proposed new industrial plant.

22. The relocated transmission lines will ultimately be the source of electric supply for the proposed new industrial plant to the electrical grid. As part of the construction of the

³ The proposed site also is currently traversed by the Valley-Hopewell (66141) 69 kV Transmission Line and the Kobuta 69 kV Tap, as well as by two 23 kV circuits, the Raccoon-Monaca 22831 and Raccoon D-23621 circuits. Because Duquesne Light does not need Commission approval to site, construct, or relocate transmission lines operating at less than 100 kV, *see* 52 Pa. Code § 57.71, these 69 kV and 23 kV circuits are not the subject of this Petition for Waiver or any future filing seeking Commission approval of the siting and construction of the Potential Project.

proposed new industrial plant, a new customer-owned 138 kV substation will connect to Duquesne Light's Valley-Raccoon (Z-81) 138 kV Transmission Line.

23. Importantly, the proposed new industrial plant cannot be completed until the existing transmission facilities are relocated.

C. THE POTENTIAL PROJECT

24. Duquesne Light has identified a route feasible to accommodate the construction of the proposed new industrial plant. The proposed route is shown in Attachment 2 and primarily utilizes property owned by the potential new customer as replacement right-of-way to relocate the facilities outside of the plant construction area.

25. The route begins on the north shore of the Ohio River approximately 2,100 feet from the riverbank at the existing Valley-Raccoon (Z-81/Z-83) 138 kV transmission line. The route then proceeds southeast for a distance of approximately 850 feet to the vicinity of the existing Valley-Hopewell (66141) 69 kV tower 320. This segment of the route requires new rights-of-way to be acquired by Duquesne Light.

26. At the Valley-Hopewell (66141) 69 kV tower 320, the route turns and proceeds east-southeast for approximately 3,800 feet, where it crosses the Ohio River. Notably, there currently are two separate river crossings of the Ohio River, one for the exiting 138 kV line and one for the 69 kV line. Upon completion of the Potential Project, the routes for the 138 kV and 69 kV lines will be combined into a single river crossing. Duquesne Light will need to obtain a submerged land lease and/or license agreement from Pennsylvania Department of Environmental Protection ("DEP") for the new combined river crossing.

27. After crossing the Ohio River, the route proceeds south-southeast, roughly parallel to Interstate 376 for approximately 3,810 feet where it turns southwest and continues approximately 2,820 feet to intercept the existing Valley-Raccoon (Z-81/Z-83) 138 kV

transmission line right-of-way. At this point, the route turns northeast and proceeds approximately 1,840 feet to the vicinity of an existing customer-owned substation. This segment of the proposed route will be located entirely on the property of the potential new customer.

28. In total, the relocation will require approximately 10.2 acres of new right-of-way on the north side of the Ohio River. On south side of the Ohio River, all of the relocated facilities will be located on the property of the potential new industrial plant.

29. The tower structures for the relocated 138 kV transmission line will consist primarily of self-supporting, double-circuit tubular steel poles. The relocation will require approximately 28 self-supporting tubular steel poles with an average height of approximately 170 feet. The proposed relocation also will require four (4) self-supporting lattice steel tower structures to support the lines crossing the Ohio River.⁴

30. Each circuit of the relocated lines will operate as a 3-phase alternating current transmission line and will consist of three (3) phase conductors and one shield wire. Each phase conductor on the river crossing spans will be 795 kcmil⁵ 20/7 Trapezoidal Aluminum Conductor Steel Supported (“ACSS/TW”) conductor. Each phase conductor on all other portions of the relocated lines will be 853.7 kcmil 24/13 Aluminum Conductor Alloy Reinforced (“ACAR”). The shield wire will be 7#8 Alumoweld in all of the relocated spans.

31. The total estimated cost of the Potential Project is \$33.47 million, which includes \$5.90 million for substation work, \$20.74 million of transmission work, and \$6.83 million of distribution work. Importantly, the entire cost of the proposed relocation will be paid for by the

⁴ Two (2) of these towers will be used for the 69 kV relocation and two (2) will be used for the 138 kV relocation.

⁵ A kcmil or circular mil is the cross-sectional area of a wire one mil in diameter, where 1 kcmil = 0.5067 mm².

new customer if the construction of the proposed industrial plant goes forward and the Potential Project is required to accommodate the construction of the new plant.

32. Upon Commission approval, the Potential Project has a scheduled construction start date of September 2014 to meet an in-service date of June 2015. Importantly, the proposed new industrial plant cannot be completed unless and until the existing transmission facilities are relocated.

33. Importantly, Duquesne Light will not relocate the existing transmission lines if the new customer does not proceed with its plans to construct the proposed new industrial plant.

D. WAIVER

34. Letters of Notification are permitted if the proposed transmission line has “a proposed route of 2 miles or less.” 52 Pa. Code § 57.72(d)(1)(vi). Letters of Notification are also permitted if the proposed transmission line is “proposed to be located entirely within ... the property of the sole customer to be served by the line.” 52 Pa. Code § 57.72(d)(1)(iii).

35. Here, as explained above and based on the route ultimately selected, the Potential Project would require approximately 2.5 miles of existing 138 kV transmission lines to be relocated. Although the proposed route for the Potential Project is only slightly greater than the 2-mile threshold for a Letter of Notification, the individual components of the Project qualify for a Letter of Notification.

36. The first component of the Potential Project is approximately 1.7 miles of 138 kV transmission lines that will be located solely on the property of the new potential customer. Duquesne Light submits that this component of the Potential Project qualifies as a Letter of Notification because it is less than 2 miles and, moreover, is located solely on the property of the potential new customer.

37. The second component of the Potential Project requires construction within new right-of-way. This component of the Potential Project will require the relocation of approximately 0.4 miles of 138 kV within new right-of-way to be acquired by Duquesne Light. Duquesne Light submits that this component of the Project qualifies as a Letter of Notification because it is less than 2 miles.

38. The third component of the Potential Project is a river crossing that will extend approximately 0.4 miles over the Ohio River. Although Duquesne Light will need to obtain approval from DEP for the river crossing, this component of the Project will minimize the existing impact to the Ohio River by reducing the total number of river crossings. Duquesne Light submits that this component of the Potential Project qualifies as a Letter of Notification because it is less than 2 miles, and because it would minimize the existing impacts of the river crossings.

39. Although the Potential Project does not meet the strict definition of any one of the circumstances in which a Letter of Notification may be used, as set forth above, it nearly fits within several of the circumstances in which a Letter of Notification may be used in lieu of an Application. Duquesne Light is requesting a waiver of the strict application of the aforementioned regulations to allow Duquesne Light to file a Letter of Notification in lieu of an Application for Commission review and approval to site and construct the Potential Project.

40. The relocated transmission lines are required to accommodate the construction and operation of the potential new industrial plant as explained above. Further, the relocated transmission lines will interconnect with the industrial plant and will be the sole source of plant's access to the electric grid. Finally, although approximately 0.4 miles of new right-of-way may be required for the Project, the relocated transmission lines will traverse a small number of

parcels with the majority on the property of the customer requesting the relocation and seeking to be interconnected with the electric grid.

41. The Commission has approved similar requests granting waivers of certain regulations regarding Commission Review of Siting and Construction of Electric Transmission Lines at 52 Pa Code § 57.71 *et seq.* See, e.g., *Letter of Notification of West Penn Power Company filed pursuant to 52 Pa. Code Chapter 57 with respect to reconstruction and relocation of the Allegheny Ludlum No. 2 138 kV Transmission Line in the City of Lower Burrell, Westmoreland County, Pennsylvania*, Docket No. A-2012-2281399 (March 1, 2012) (approving the construction of a 2.7 mile transmission line project under 52 Pa. Code § 57.72(d)(1)(v) and (vi) because a portion of the line transmission line is to be reconducted or reconstructed and a separate portion being relocated is less than two miles in length); *Petition for Waiver of Certain Provisions of the Pennsylvania Public Utility Commission's Regulations for Commission Review of Siting and Construction of Electric Transmission Lines set forth at 52 Pa. Code § 57.71 et seq.*, Docket No. P-2008-2037618 (June 27, 2008) (approving a for a waiver from Section 57.72(d) for the construction of a 3.9 mile 115 kV transmission line to connect a new ethanol plant to the grid); *Letter of Notification of Pennsylvania Electric Company pursuant to 52 Pa. Code § 57.72(d) to install the East-Towanda Mansfield 115 kV Transmission Line Tap to the Tennessee Gas Pipeline Substation located in Troy Township, Bradford County, Pennsylvania (Penelec/Tennessee Gas)*, Docket No. A-110400F0045 (February 6, 2006) (approving a request for waiver of certain provisions of 52 Pa. Code § 57.72(d)(1) for a 2.6 miles long transmission line project located along the rights-of-way of an existing line and across the property of the sole customer to be served by the line).

42. For the reasons provided above, and assuming the Potential Project moves forward, Duquesne Light requests that the Commission approve this waiver of the strict application of the Commission's siting regulations and allow Duquesne Light to file a Letter of Notification in lieu of an Application for Commission review and approval to site and construct the Potential Project.

E. NOTICE

43. All owners of property within the proposed right-of-way required for the relocation are listed in Attachment 3. The landowners listed in Attachment 3 were notified by Duquesne Light representatives and sent a letter summarizing the proposed construction of the Potential Project. Further, copies of this Petition for Waiver will be served on the landowners listed in Attachment 3.

44. If the Commission approves the waiver request, a Letter of Notification may be used for the Potential Project instead of a full siting application. Alternatively, if the Commission denies this waiver request, a full siting application will be filed for Commission approval of the Potential Project.

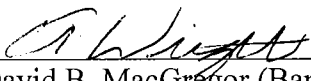
45. If the proposal to construct the new industrial plant goes forward, Duquesne Light will file the appropriate filing, *i.e.*, either a Letter of Notification or a full siting Application, if and when it becomes necessary. All of the information necessary for the Commission to decide whether to approve the siting and construction of the Potential Project will be included with the applicable filing. Any parties want to participate in the proceeding or potentially might oppose the siting approval for the Potential Project will have the full opportunity to participate in the future proceeding if and when it is filed.

III. CONCLUSION

WHEREFORE, Duquesne Light Company respectfully requests that the Pennsylvania Public Utility Commission grant the request for a waiver described above and in the attachments hereto, and, if and when necessary, allow Duquesne Light Company to file a Letter of Notification in lieu of an Application for Commission review and approval of the siting and relocation of existing transmission lines in Brighton, Vanport, Potter, and Center Townships, Beaver County, Pennsylvania to accommodate the potential construction of a new industrial plant in Beaver County.

Respectfully submitted,

Robert H. Hoaglund (ID # 313383)
Assistant General Counsel
Duquesne Light Company
411 Seventh Avenue, 16th Floor
Pittsburgh, PA 15219
Phone: 412-393-1058
Fax: 412-393-5695
E-mail: rhoaglund@duqlight.com



David B. MacGregor (Bar I.D. #28804)
Christopher T. Wright (Bar I.D. # 203412)
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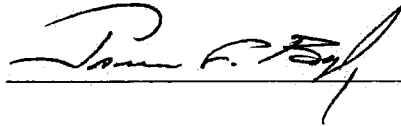
Date: January 22, 2014

Counsel for Duquesne Light Company

VERIFICATION

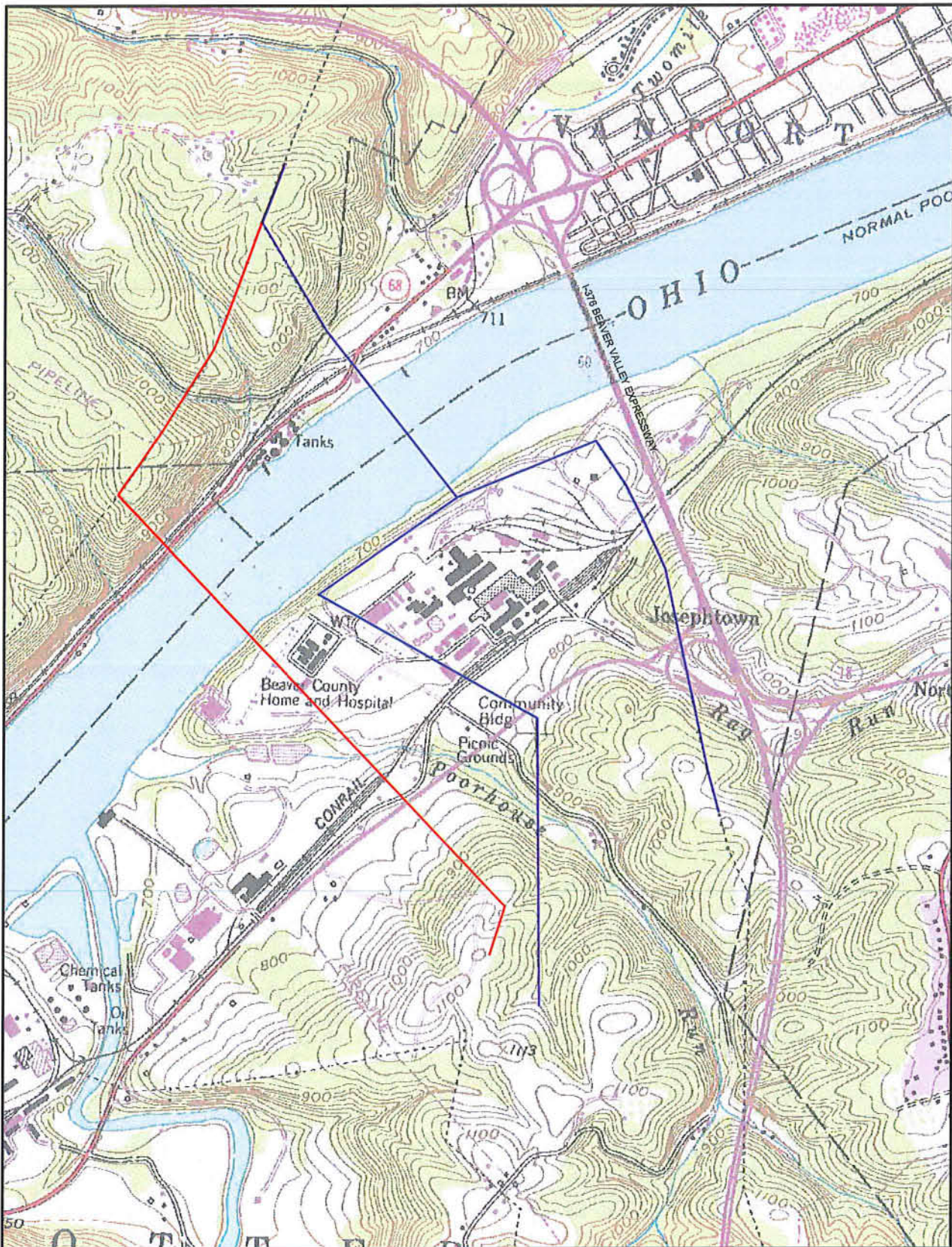
I, James F. Boyle, PE, being the Sr. Project Manager at Duquesne Light Company, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect Duquesne Light Company to be able to prove the same at a hearing held in this matter. 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: Jan 20, 2014



James F. Boyle, PE

Attachment 1

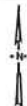


LEGEND:

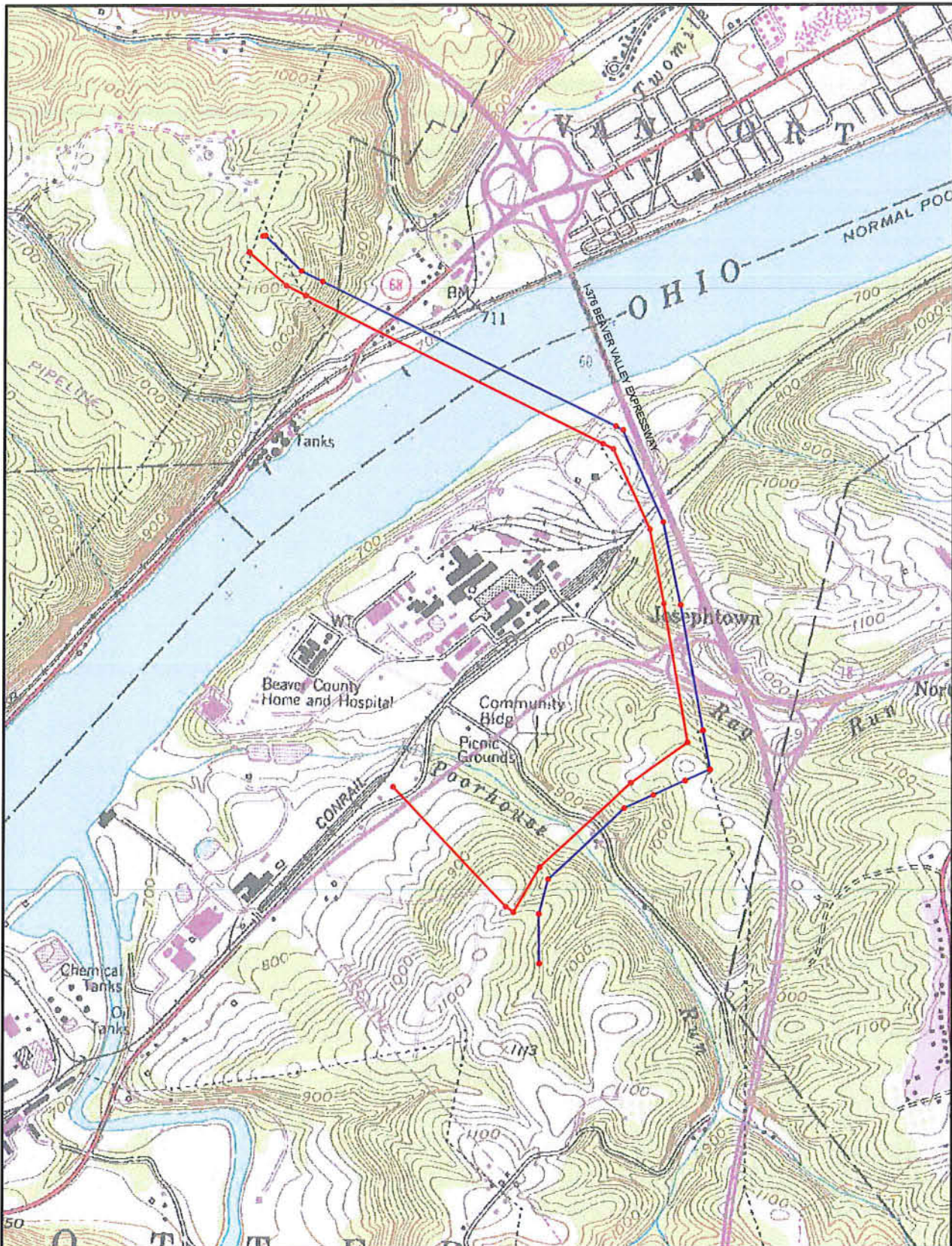
- EXISTING 138kV LINE (VALLEY-RACCOON Z-81 & Z83)
- EXISTING 69kV LINE (VALLEY-HOPEWELL 66141)

ATTACHMENT 1
 EXISTING 69kV AND 138kV LINES
 TO BE RELOCATED
 USGS QUADRANGLE - BEAVER

SCALE: 1" = 1,000'



Attachment 2

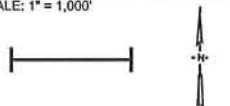


LEGEND:

- PROPOSED TRANSMISSION POLES
- 138kV LINE RELOCATION
- 69kV LINE RELOCATION

ATTACHMENT 2
 PROPOSED RELOCATION OF
 VALLEY-RACCOON 138kV LINES
 CIRCUITS Z81 & Z83
 USGS QUADRANGLE - BEAVER

SCALE: 1" = 1,000'



Attachment 3

DUQUESNE LIGHT COMPANY

PROPERTIES IMPACTED BY REVISED TRANSMISSION LINE ROUTING

Number	Parcel ID Number	Owner Name	Mailing Address	Muni/Twp/Boro	Parcel Address	Parcel Description
14	54-003-0101	GSC Real Estate, LP	670 State Ave Vanport, PA 15009	Vanport Twp	670 State Ave	25.5 AC COURTNEY PL HSE GARS
33	55-152-0290	Grimes, Lloyd & Karen O'Neill	2519 Mill St Akiuppa, PA 15001	Brighton Twp	00000 LR 04041	PTLOT 2 ASSOCIATED MEDCL SPECIALISTS PL
39	54-001-0108.00E	Pennsylvania Lines LLC %Norfolk Southern Corp	110 Franklin Road SE Roanoke, VA 24042	Vanport Twp	00000 Route 68	2.5 AC
40	54-001-0111	Interstate Chemical Company Inc. Jocher Corp	2797 Freedland Road West Middlesex, PA 16159	Vanport Twp	00000 State Avenue	LOT 1-B ASHLAND OIL INC SUB
41	54-001-0109	C/O Paul Cirillo	2797 Freedland Road Hermitage, PA 16148	Vanport Twp	725 State Ave	9.16 AC BLDG TANKS
42	54-001-0113	People Natural Gas Company	2 Gateway Center Pittsburgh, PA 15222	Vanport Twp	00000 Sebring Road	0.63 AC BLDG
43	54-001-0114	Dobish, Michael A & Zercher, Cherie L	119 Orinda Drive Beaver, PA 15009	Vanport Twp	00000 State Avenue	LOT 2A GRIMES PL
44	54-001-0114.001	Associated Medical Specialists	114 Woodlawn Drive Beaver, PA 15009	Vanport Twp	690 State Ave	LOT 1 ASSOCIATED MEDICAL SPECIALISTS PL BLDG
46	54-001-0104	Mathews, Gerald J & Eddi K	560 McIntyre Drive Beaver, PA 15009	Vanport Twp	723 State Ave	0.755 AC HS GR
47	54-001-0103	Belich, Caryl M & George E	2 Pleasant Grove Drive Beaver Falls, PA 15010	Vanport Twp	717 State Ave	LOT
48	54-001-0102	Belich, Caryl M	2 Pleasant Grove Drive Beaver Falls, PA 15010	Vanport Twp	711 State Ave	LOT
49	54-001-0101	Belich, George E & Caryl M	2 Pleasant Grove Drive Beaver Falls, PA 15010	Vanport Twp	00000	LOT
50	54-001-0100	Drug and Alcohol Services of Beaver Valley, Inc Sunoco Ptnrs Mktg Term LP	697 State Street Vanport, PA 15009	Vanport Twp	697 State Ave	N E CORNER ACADEMY LT 30 PUR 1 DOUDS EST BLDG
54	54-002-0305	% Ten Penn Ctr-Propy Tax	1801 Market Street Philadelphia, PA 19103	Vanport Twp	00000 Conway Street	2.40 AC HS BLDG GR IMP