



17 North Second Street  
12th Floor  
Harrisburg, PA 17101-1601  
717-731-1970 Main  
717-731-1985 Main Fax  
www.postschell.com

Christopher T. Wright

cwright@postschell.com  
717-612-6013 Direct  
717-731-1985 Direct Fax  
File #: 160548

RECEIVED  
2015 APR -2 PM 3:05  
PA PUC  
SECRETARY'S BUREAU

April 2, 2015

**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: Letter of Notification of Duquesne Light Company, Filed Pursuant to 52 Pa. Code Chapter 57 Subchapter G, for Approval to Increase the Operating Voltage of an Existing Circuit from 138 kV to 345 kV, and to Add a Second 138 kV Circuit to Existing Tower Structures in the City of Pittsburgh and Baldwin Borough, Allegheny County, Pennsylvania - Docket No. A-2015-**

Dear Secretary Chiavetta:

Enclosed for filing are an original and six (6) copies of the Letter of Notification of Duquesne Light Company together with the accompanying attachments in the above-referenced proceeding. Also enclosed is a CD containing copies of the Letter of Notification and attachments.

As indicated on the Certificate of Service, copies of the Letter of Notification and accompanying exhibits and appendices are being served by certified mail, return receipt requested upon the involved governmental agencies and property owners.

Subject to Commission approval, construction is scheduled to begin as soon as practicable to support an in-service date of March 2016.

If you have any questions concerning this matter, please contact me at the address or telephone numbers provided above.

Rosemary Chiavetta, Secretary  
April 2, 2015  
Page 2

Respectfully submitted,



Christopher T. Wright

CTW/jl  
Enclosures

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

RECEIVED

2015 APR -2 PM 3:06

PA PUC  
SECRETARY'S BUREAU

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Letter of Notification of Duquesne :  
Light Company, Filed Pursuant to 52 :  
Pa. Code Chapter 57 Subchapter G, for : Docket No. A-2015-\_\_\_\_\_  
Approval to Increase the Operating :  
Voltage of an Existing Circuit from 138 :  
kV to 345 kV, and to Add a Second 138 :  
kV Circuit to Existing Tower Structures :  
in the City of Pittsburgh and Baldwin :  
Borough, Allegheny County, :  
Pennsylvania. :

**RECEIVED**  
**2015 APR -2 PM 3:07**  
PA PUC  
SECRETARY'S BUREAU

---

**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 approval from the Pennsylvania Public Utility Commission (“Commission”) to increase the operating voltage of an existing circuit from 138 kV to 345 kV, and to add a second 138 kV circuit to existing tower structures (the “Project”). The Project is needed to resolve multiple North American Electric Reliability Corporation (“NERC”) and PJM Interconnection, LLC (“PJM”) reliability violations, and to reinforce the 345 kV system serving the Pittsburgh region. The Project is located in the City of Pittsburgh and Baldwin Borough, Allegheny County, Pennsylvania. Duquesne Light has provided information regarding this Project to these political subdivisions, which have not objected to the Project.

Subject to the Commission’s approval, construction of this Project is scheduled to begin as soon as practicable after receipt of the Commission’s approval, to support an in-service date of March 2016. 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:

Duquesne Light Company  
411 Seventh Avenue  
Pittsburgh, PA 15219

3. Duquesne Light's attorneys are:

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

Robert H. Hoaglund (ID # 313383)  
Assistant General Counsel  
Lesley C. Gannon (ID # 87756)  
Senior Counsel - Commercial  
Duquesne Light Company  
411 Seventh Avenue, 16<sup>th</sup> Floor  
Pittsburgh, PA 15219  
Phone: 412.3931058  
Fax: 412.393.5695  
E-mail: rhoaglund@duqlight.com  
E-mail: lgannon@duqlight.com

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

RECEIVED  
2015 APR -2 PM 3:07  
PA PUC  
SECRETARY'S BUREAU

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 Letter of Notification includes the following accompanying attachments:

- Attachment 1 Aerial Map of Existing Facilities
- Attachment 2 One Line Diagram of Existing Facilities
- Attachment 3 One Line Diagram of Proposed Facilities
- Attachment 4 Typical Cross Section of 138 kV Right-of-Way
- Attachment 5 Typical Cross Section of 345 kV Right-of-Way

7. 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

8. 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.

9. 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.

10. 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 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.

11. 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.<sup>1</sup>

12. 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.

---

<sup>1</sup> Duquesne Light’s reliability and planning standards are set forth in its FERC Form No. 715 annual report.

## 2. Existing System

13. Duquesne Light's transmission system consists of 69 kV, 138 kV, and 345 kV facilities that form a loop around the City of Pittsburgh and its suburbs.

14. As required by PJM's 2007 RTEP, Duquesne Light proposed the construction of the "Brady Project" to maintain reliable service to Pittsburgh and the surrounding tri-state area. The Brady Project involves the construction of a 345 kV transmission ring around the City of Pittsburgh and requires the upgrade of several 138 kV circuits, conversion of 69 kV circuits to 138 kV operation, construction of extensive state-of-the-art forced cooling for the 138 kV and 345 kV underground cables, and the development of 345 kV substations at the Arsenal, Brunot Island, and Carson Substations.<sup>2</sup>

15. The existing Arsenal-Carson (307) 345 kV circuit originates at the Carson Substation and extends approximately 1.35 miles on one side of double-circuit tower and monopole structures to tower structure 6691. The other side of the double-circuit structures from the Carson Substation to tower structure 6691 is occupied by the existing Z-71 138 kV circuit, which continues from tower structure 6691 to the Dravosburg Substation.

16. From tower structure 6691, the Arsenal-Carson (307) 345 kV circuit and an idle section of conductor<sup>3</sup> extend approximately 0.4 miles (2,197 feet) across the Monongahela River to the Tecumseh Substation on double circuit structures. From the Tecumseh Substation, the Arsenal-Carson (307) 345 kV proceeds as an underground circuit to the Arsenal Substation.

---

<sup>2</sup> See *Application of Duquesne Light Company for the Siting and Construction of a 345 kV Transmission Line in the City of Pittsburgh, Municipality of Penn Hills, Verona Borough and Plum Borough, Allegheny County, PA*, Docket No. A-2010-2159814 (Feb. 10, 2011) (approving the siting and construction of a part of the 345 kV transmission ring and related facilities between the Brunot Island and Logans Ferry Substations).

<sup>3</sup> This idle section of conductor was part of the former Carson-Oakland-Dravosburg (Z-71) 138 kV three-terminal circuit. The section of this three-terminal circuit between tower 6691 and Tecumseh was designed and built for 345 kV operation but initially was operated at only 138 kV. This section of the three-terminal circuit between tower 6691 and Tecumseh was idled due to changes to the underground 138 kV transmission system between Tecumseh Substation and the Oakland Substation associated with other portions of the Brady Project.

17. The existing Z-88 138 kV circuit extends approximately 1.13 miles from the Carson Substation to tower structure 3640 on one side of double-circuit structures, and then continues to the Bettis Substation. The other side of the double-circuit structures from the Carson Substation to tower 3640 currently is unoccupied.

18. An aerial map depicting the current location of the existing facilities is provided as Attachment 1. A one line diagram of the existing facilities is provided as Attachment 2.

### **3. Need for the Project**

19. As part of its review and update of reliability violations and ongoing projects, PJM identified several additional reliability violations on Duquesne Light's 138 kV and 345 kV underground cables.

20. Specifically, the 2007 RTEP identified the following violations of the NERC and PJM reliability standards: (i) beginning in 2012, "N-2" overloads<sup>4</sup> on Duquesne's forced-cooled 345 kV underground cables; and (ii) beginning in 2012, "N-2" overloads on Duquesne Light's 138 kV underground cables.

21. As part of the 2011 RTEP, Duquesne Light and PJM reevaluated the Brady Project and determined that the "N-2" overloads initially identified in the 2007 RTEP as beginning in 2012 are projected to occur in 2016. Additionally, the 2011 RTEP identified "N-1" overloads<sup>5</sup> on Duquesne Light's forced-cooled 345 kV underground cables are projected to occur in 2022.

---

<sup>4</sup> NERC Category C criteria require the system to be stable and within applicable equipment thermal ratings and system voltage limits for less probable contingency events. Such events include multiple facility outages such as bus, tower line, or circuit breaker failures. Also included are second contingencies involving the loss of one system element followed by manual system readjustments, and then the loss of a second system element. These second contingencies are referred to as the "N-2" (also referred to as "N-1-1") criteria.

<sup>5</sup> NERC Category B criteria impose similar requirements with one facility removed from service. This is referred to as the "N-1" criteria. These criteria ensure that the system continues to remain within applicable limits and stable upon the outage of a transmission element.

## **B. THE PROPOSED PROJECT**

22. To resolve the NERC and PJM reliability violations identified in the 2007 and 2011 RTEPs, Duquesne Light proposes to improve reliability by establishing a 345 kV ring around the City of Pittsburgh and its suburbs to provide both transmission load relief and replacing equipment approaching the end of useful life. The proposed Project involves upgrades to the existing substations and transmission lines.<sup>6</sup>

23. Pertinent to this Letter of Notification, Duquesne Light seeks Commission approval to increase the operating voltage of an existing circuit from 138 kV to 345 kV, and to add a second 138 kV circuit to existing tower structures as described below. A one line diagram of the proposed overhead facilities is provided in Attachment 3.

### **1. Increasing the Operating Voltage from 138 kV to 345 kV**

24. As part of this Project, Duquesne Light proposes to increase the operating voltage of approximately 1.35 miles of the existing Z-71 circuit between the Carson Substation and tower structure 6691 from 138 kV to 345 kV, increase the operating voltage of approximately 0.4 miles of the currently idle conductor between tower structure 6691 and the Tecumseh Substation from 138 kV to 345 kV, and interconnect the two lines to form one continuous 345 kV transmission line that will extend from Carson Substation to the Tecumseh Substation and be re-named the Brunot Island-Carson (302) 345 kV circuit.<sup>7</sup>

25. The existing Z-71 circuit from the Carson Substation to tower structure 6691 was designed and constructed for 345 kV operation but, currently, operates at 138 kV. In order to

---

<sup>6</sup> In addition to upgrades to the overhead transmission lines discussed in this Letter of Notification, the project also requires upgrades to the existing underground transmission lines and construction of new underground facilities. Because Duquesne Light does not need Commission approval to site, construct, or relocate underground transmission lines, *see* 52 Pa. Code §§ 57.1, 57.71, these underground facilities are not the subject of this Letter of Notification.

<sup>7</sup> The Brunot Island-Carson (302) 345 kV circuit is overhead construction from Carson Substation to Tecumseh Substation at which point this circuit transitions to underground construction to the Brunot Island Substation.

increase the operating voltage of the Z-71 circuit, approximately 0.08 miles of new 345 kV transmission line will need to be constructed to tie the existing Z-71 circuit into the 345 kV switchyard at the Carson Substation. Two structures at the Carson Substation (tower structures 6703 and 6702) will be replaced with a new steel monopole and a new dead end structure to accommodate the reconfiguration of the 345 kV circuits at the Carson Substation. This new segment of 345 kV transmission line, including the two new structures, will be constructed entirely on Duquesne Light's Carson Substation property.

26. In order to interconnect the existing Z-71 circuit with the currently idle conductor to form one continuous 345 kV transmission line, approximately 0.06 miles of new 345 kV transmission line will need to be constructed near tower structure 6691 to tie the two circuits together. This new segment of 345 kV transmission line will be constructed entirely within the existing right-of-way, using the existing tower structures.

27. No new rights-of-way are required for this portion of the Project.

## **2. Addition of the Second 138 kV Circuit**

28. As explained above, the Z-71 138 kV circuit currently extends from the Carson Substation to tower structure 6691 and then continues on from tower structure 6691 to the Dravosburg Substation.

29. Once the operating voltages of the Z-71 circuit and currently idle conductor are increased to 345 kV and the two lines are interconnected to form the Brunot Island-Carson (302) 345 kV circuit as described above, there will no longer be a 138 kV transmission line that extends from the Carson Substation to tower structure 6691. As a result, the segment of the Z-71 138 kV circuit that extends from tower structure 6691 to the Dravosburg Substation will terminate at tower structure 6691 without a 138 kV source.

30. In order to ensure there continues to be a 138 kV transmission line between the Carson and Dravosburg Substations, Duquesne Light proposes to add a new 138 kV circuit from the Carson Substation to interconnect with the remaining segment of the Z-71 138 kV circuit at structure 6691. Upon completion, the entire 138 kV transmission line between the Carson and Dravosburg Substations will be named the Z-71 138 kV circuit.

31. As explained above, currently only one side of the double-circuit structures from the Carson Substation to tower structure 3640 is occupied (by the Z-88 138 kV circuit). Duquesne Light proposes to add a new second 138 kV circuit to these existing double-circuit tower structures that will extend approximately 1.13 miles from the Carson Substation to tower structure 3640. This second 138 kV circuit will be constructed entirely within the existing right-of-way using the existing double-circuit tower structures.

32. Two structures near the Carson Substation (tower structures 3653 and 3654) will be replaced by new 138 kV structures to accommodate the reconfiguration of the 345 kV circuits at the Carson Substation. These two new 138 kV structures will be located within the existing right-of-way adjacent to and on the same property as the existing tower structures.

33. In order to interconnect the newly added second 138 kV circuit to the existing Z-71 138 kV circuit, approximately 0.38 miles (2,006 feet) of new 138 kV transmission line will be constructed between tower structure 3640 and tower structure 3638. This portion of the project will be constructed entirely within the existing right-of-way. Four new 138 kV structures will be required to route both the Z-71 and Z-88 138 kV circuits around the existing tower structure 6691 and to ensure sufficient clearance is maintained between the 345 kV and 138 kV transmission lines near tower 6691. These four new 138 kV structures will be located within the existing right-of-way and in close proximity to tower 6691.

34. No additional rights-of-way are required for this portion of the Project.

**3. The Proposed Project Resolves All the Identified Planning Criteria Violations**

35. The proposed Project resolves all the planning criteria violations identified in the 2007 and 2011 RTEPs.

36. The proposed Project will improve reliability by completing a 345 kV ring around the City of Pittsburgh and its suburbs. The proposed Project will provide critical transmission load relief, as well as replace equipment approaching the end of its useful life.

37. The proposed Project will provide the region with the required electric power supply and will meet all NERC, PJM, and Duquesne Light criteria. Overall, the proposed Project will improve the reliability of service to critical load in Pittsburgh, including the downtown business district and numerous hospitals and universities in the Oakland Area.

38. Duquesne Light submitted the proposed Project to PJM for review and inclusion in the 2007 RTEP. The Project was presented before stakeholders at the PJM Transmission Expansion Advisory Committee meeting on August 22, 2007, and approved by the PJM Board. The Project was reevaluated in the 2011 RTEP and was presented before stakeholders at the PJM Transmission Expansion Advisory Committee meeting on September 8, 2011, and approved by the PJM Board.<sup>8</sup>

39. The total estimated cost of the entire Project is approximately \$78 million, which includes approximately \$1.1 million for the overhead transmission line work that is the subject of

---

<sup>8</sup> The proposed Project was included in the 2007 and 2011 RTEPs as baseline project b0502.

this Letter of Notification (*i.e.*, the work associated with increasing the operating voltage from 138 kV to 345 kV and adding the second 138 kV circuit described above).<sup>9</sup>

40. Subject to the Commission's approval, construction of this Project is scheduled to begin as soon as practicable after receiving Commission approval in order to meet an in-service date of March 2016.

### **III. HEALTH AND SAFETY**

41. The proposed Project will not create any unreasonable risk of danger to the public health or safety.

42. 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.

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

44. No communication towers, pipelines, or other utilities will be affected by the proposed Project.

45. The airport nearest to the proposed Project is the Allegheny County Airport, which is located approximately 3.3 miles from the closest proposed transmission line construction. The next nearest airport is Pittsburgh International Airport, which is approximately 13.6 miles from the closest proposed transmission line construction. Due to the distance from these airports and the presence of the existing transmission line facilities in the vicinity, no impacts to either airport are anticipated.

---

<sup>9</sup> The remainder of the total estimated cost for the Project is related to the work associated with upgrades to and construction of the substation and underground facilities that are beyond the scope and subject of this Letter of Notification.

#### **IV. DESCRIPTION OF RIGHT-OF-WAY**

46. The Project will require the increase in the operating voltage of approximately of 1.75 miles of existing transmission lines (1.35 miles between the Carson Substation and tower structure 6691 and approximately 0.4 miles between tower structure 6691 and the Tecumseh Substation). The increase in the operating voltage also will require approximately 0.14 miles of new 345 kV transmission line (0.08 miles to interconnect at the Carson Substation and 0.06 miles to interconnect with the existing idle 138 kV conductors near tower structure 6691).

47. As explained above, the increase in the operating voltage will require the replacement of two existing structures (tower structures 6703 and 6702) with a new steel monopole and a new dead end structure to accommodate the reconfiguration of the 345 kV circuits at the Carson Substation. The new steel monopole structure will have a height of approximately 150 feet, and the new dead end structure will have a height of approximately 150 feet. The two new structures will be constructed entirely on Duquesne Light's Carson Substation property. Therefore, it is anticipated that these new structures will have little material impact on the area.

48. For the addition of the second 138 kV circuit, this portion of the Project will require the construction of approximately 1.51 miles new 138 kV transmission lines (1.13 miles to add the second 138 kV circuit to the existing tower structures and 0.38 miles to interconnect with the existing Z-71 138 kV circuit near tower structure 3640).

49. As explained above, the addition of the second 138 kV circuit will require the replacement of two structures near the Carson Substation (tower structures 3653 and 3654) to accommodate the reconfiguration of the 345 kV circuits at the Carson Substation. These two new 138 kV structures will have an average height of approximately 158 feet. These two new 138 kV structures will be located within the existing right-of-way adjacent to and on the same

property as the existing tower structures. Therefore, it is anticipated that these new structures will have little material impact on the area.

50. The addition of the second 138 kV circuit will also require four new 138 kV structures to route both the Z-71 and Z-88 138 kV circuits around the existing tower structure 6691 and to ensure sufficient clearance is maintained between the 345 kV and 138 kV transmission lines near tower 6691. These four new structures will have an average height of approximately 90 feet. These four new 138 kV structures will be located within the existing right-of-way and in close proximity to tower 6691. Therefore, it is anticipated that these new structures will have little material impact on the area.

51. The proposed Project will be located entirely within the existing rights-of-way and on substation property owned in fee by Duquesne Light. The existing 345 kV right-of-way extending from the Carson Substation to tower structure 6691 is approximately 100 feet. The existing 138 kV right-of-way extending from the Carson Substation to tower structure 3640 is approximately 85 feet and then widens to approximately 135 feet near tower structure 6691. Typical cross sections of the 138 kV and 345 kV rights-of-way are provided in Attachments 4 and 5, respectively.

52. The existing rights-of-way are sufficient to accommodate the proposed construction activities associated with the increase in operating voltage from 138 kV to 345 kV and the addition of the second 138 kV circuit to existing towers. No new rights-of-way are required for the proposed Project.

53. Vegetation management practices are based on maintenance rights acquired, voltage of the line involved, proximity of trees to the facilities, and the species and condition of trees involved. The proposed Project will be constructed entirely within existing rights-of-way,

which previously have been cleared of vegetation. As a result, limited vegetation management will be required for this Project.

54. In areas where vegetation management is required, 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. Under the *Wire Zone/Border Zone management technique*, non-compatible species in both the *Wire zone* and *Border Zone* areas are removed.<sup>10</sup> Areas within the *Wire Zone* are cleared of all woody vegetation leaving only grasses and other herbaceous plants, such as low-growing shrubs. Areas within the *Border Zone* are cleared of all vegetation that would exceed 15 feet at maturity. The *Wire Zone/Border Zone management technique* also requires vegetation management operations extend to “danger trees” located outside the right-of-way that present a hazard to a transmission line. Danger trees are those that, in falling, would either strike the conductors or pass within the minimum clearances required for the conductors.

55. The Project area contains no state lands, national parks, state parks, or local parks.

56. The Project will not traverse or affect any unique geological, scenic, or natural areas.

57. The Project will not affect any recreational areas or natural landmarks.

58. Duquesne Light will review the proposed Project with the Pennsylvania Historical and Museum Commission (“PHMC”) to determine whether the project will have any impacts to cultural and archaeological resources. Duquesne Light will coordinate with and comply with any surveys or conditions required by the PHMC.

---

<sup>10</sup> The “wire zone” is defined as the area within the right-of-way that includes the area underneath the conductor and extends 10 feet outward from the outer-most conductor on both sides of the transmission line. The “border zone” is defined as the remainder of the right-of-way, or the area within the right-of-way that extends from the edge of the wire zone, as defined above, to the outer-most edge of the right-of-way.

59. Duquesne Light will obtain all necessary environmental permits. Duquesne Light will comply with all of the terms and conditions placed on those permits.

60. Duquesne Light will acquire any required soil and sedimentation control permits and will comply with any conditions placed on those permits. Duquesne Light also will develop an Erosion and Sedimentation Control Plan. A Post Construction Stormwater Management/Site Restoration (PCSM) Plan will be prepared if required.

61. Duquesne Light has reviewed the Pennsylvania Natural Diversity Inventory (PNDI) records under the jurisdiction of the Pennsylvania Department of Conservation and Natural Resources, the Pennsylvania Fish and Boat Commission ("PFBC"), the Pennsylvania Game Commission, and the U.S. Fish and Wildlife Service. Based on this review, no further review is required by these jurisdictional agencies. Since the Project will be located entirely within the existing rights-of-way and in close proximity, it is anticipated that the proposed Project will have no material impact to any wildlife or vegetation listed as threatened, endangered, or species of special concern. Notwithstanding, Duquesne Light will, to the extent required, coordinate with these agencies, acquire any required permits, and comply with any conditions placed on those permits.

## V. NOTICE

62. Duquesne Light has provided information regarding the Project to representatives of the City of Pittsburgh and Baldwin Borough in Allegheny County. These entities have not objected to the proposed Project.

63. Copies of this Letter of Notification will be served on the governmental agencies, municipalities, and other public entities agencies in accordance with 52 Pa. Code § 57.72(d)(3).

64. All landowners that may be affected by the proposed overhead transmission line work associated with the Project will be served with a copy of this Letter of Notification in accordance with 52 Pa. Code § 57.72(d)(3).

## **VI. LETTER OF NOTIFICATION**

65. 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)(1)(i), 57.72(d)(1)(iv) and 57.72(d)(1)(vi).

66. 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.

67. The existing rights-of-way and easements for the proposed 138 kV and 345 kV transmission lines over the affected properties provide the property rights necessary to increase the operating voltage of the existing circuit from 138 kV to 345 kV and to add a second 138 kV circuit to existing tower structures without the need for additional right-of-way.

68. The proposed increase in voltage of approximately 1.75 miles of existing transmission lines will not substantially alter the existing right-of-way. Although this portion of the Project will require the construction of new 345 kV transmission lines and the replacement of two structures to increase the voltage and interconnect it with the existing 345 kV system, this portion of the Project will require less than 2 miles of new transmission line (approximately 0.14 miles).

69. The proposed addition of the second 138 kV circuit to the existing tower structures will not substantially alter the existing right-of-way. Although this portion of the Project will require the construction of new 138 kV transmission lines, the replacement of two

existing structures, and four new structures, this portion of the Project will require less than 2 miles of new transmission line (approximately 1.51 miles).

70. 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 proposed Project will be constructed as proposed herein without the formal application process set forth at 52 Pa. Code §§ 57.71, *et seq.*


## VII. CONCLUSION

WHEREFORE, Duquesne Light Company respectfully requests that the Pennsylvania Public Utility Commission approve the proposed increase in the operating voltage of an existing circuit from 138 kV to 345 kV and addition of a second 138 kV circuit to existing tower structures in the City of Pittsburgh and Baldwin Borough, Allegheny County, Pennsylvania as explained above and in the Attachments hereto.

Respectfully submitted,

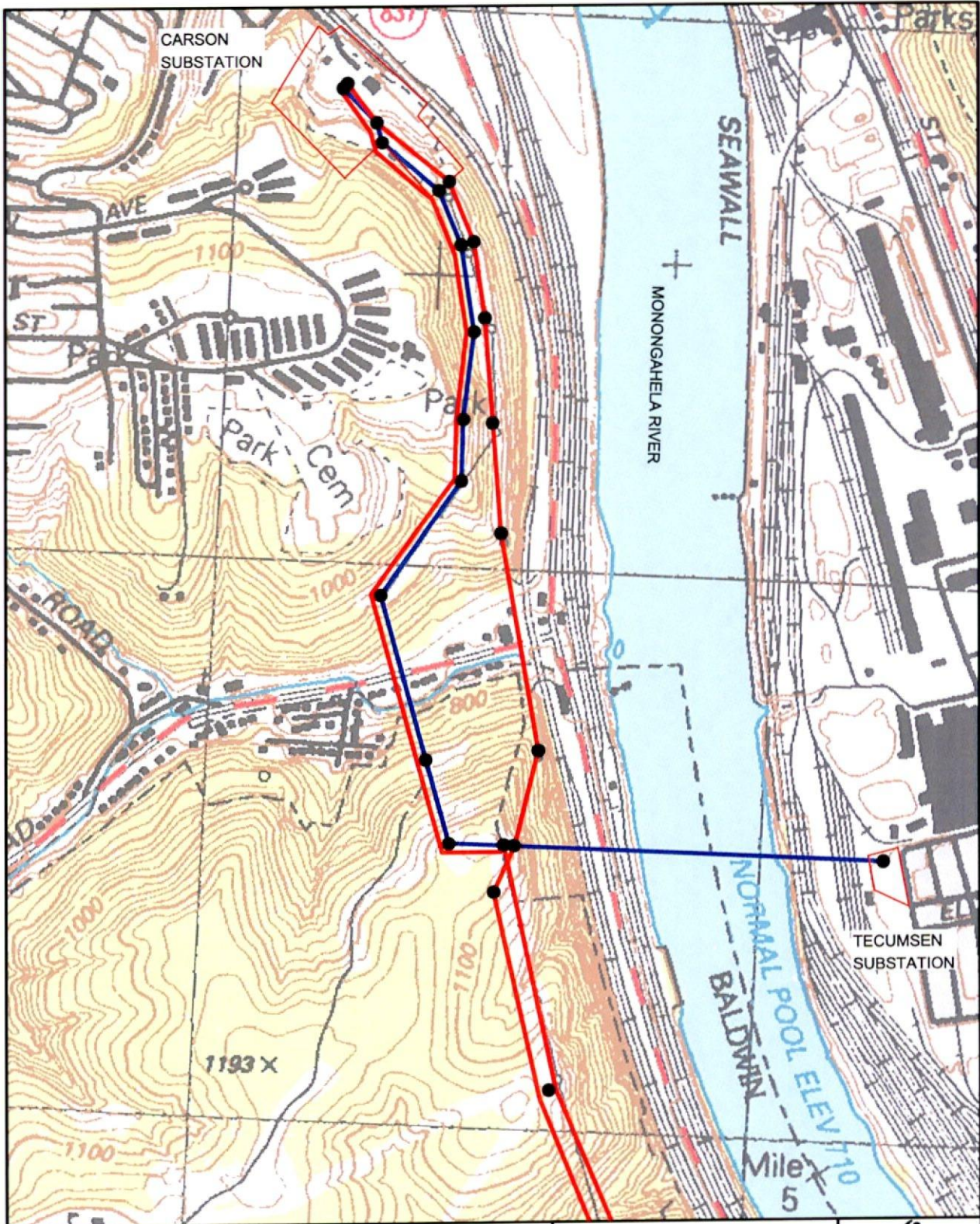
Robert H. Hoaglund (I.D. # 313383)  
Assistant General Counsel  
Lesley C. Gannon (I.D. # 87756)  
Senior Counsel – Commercial  
Duquesne Light Company  
411 Seventh Avenue, 16th Floor  
Pittsburgh, PA 15219  
Phone: 412-393-1058  
Fax: 412-393-5695  
E-mail: rhoaglund@duqlight.com  
E-mail: lgannon@duqlight.com

Date: April 2, 2015

  
David B. MacGregor (I.D. #28804)  
Christopher T. Wright (I.D. # 203412)  
17 North Second Street  
Post & Schell, P.C.  
12th Floor  
Harrisburg, PA 1701-1601  
Phone: 717.731.1970  
Fax: 717.731.1985  
E-mail: dmacgregor@postschell.com  
E-mail: cwright@postschell.com

Counsel for Duquesne Light Company

RECEIVED  
2015 APR -2 PM 3:07  
PA PUC  
SECRETARY'S BUREAU



LEGEND:

- TRANSMISSION STRUCTURES
- 138kV LINE
- 345kV LINE

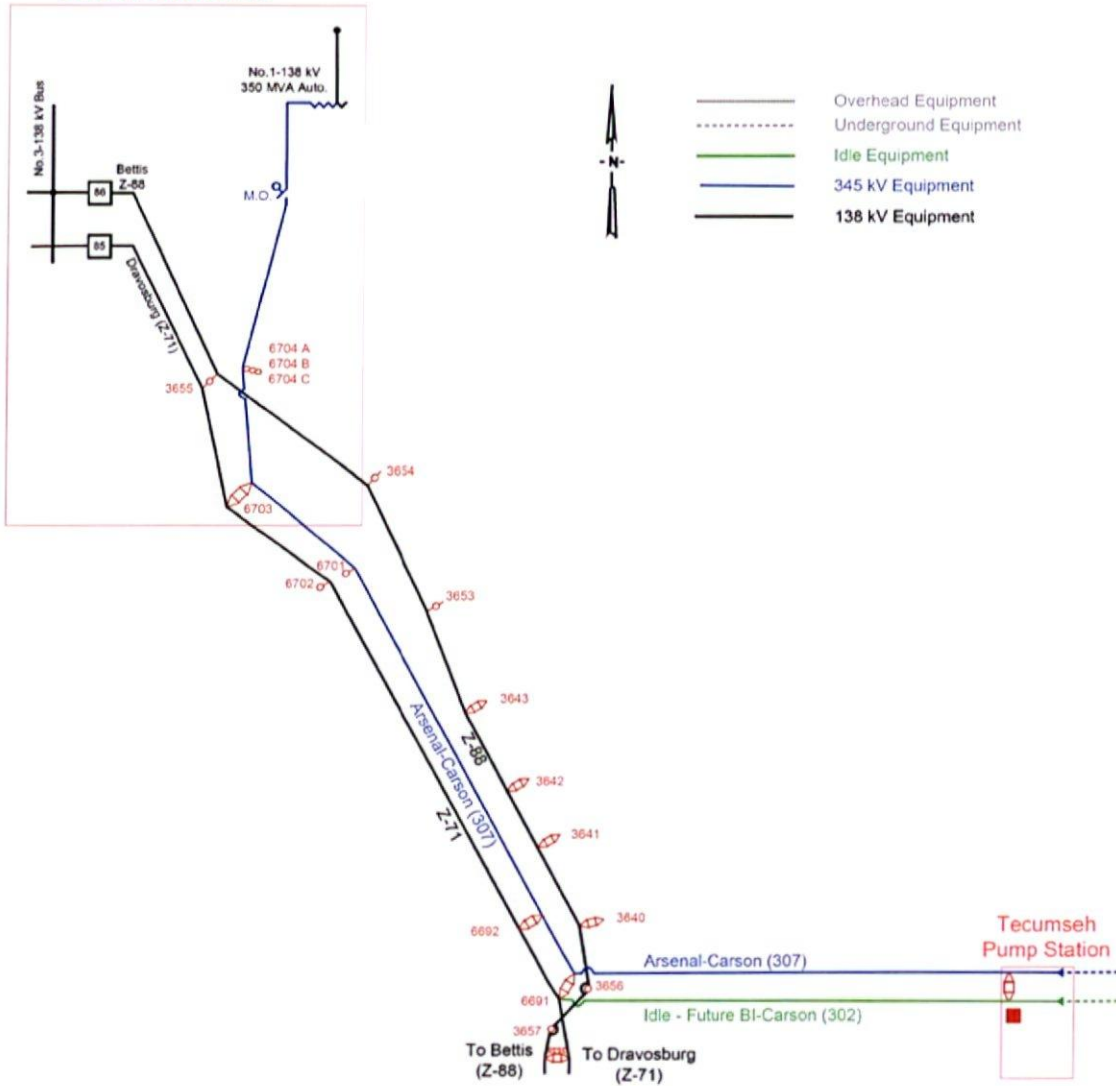
ATTACHMENT 1




EXISTING 138kV  
AND 345kV LINES  
TO BE RECONFIGURED  
USGS QUADRANGLE - PITTSBURGH EAST

RECEIVED  
2015 APR -2 PM 3:04  
PA POC  
SECRETARY'S BUREAU

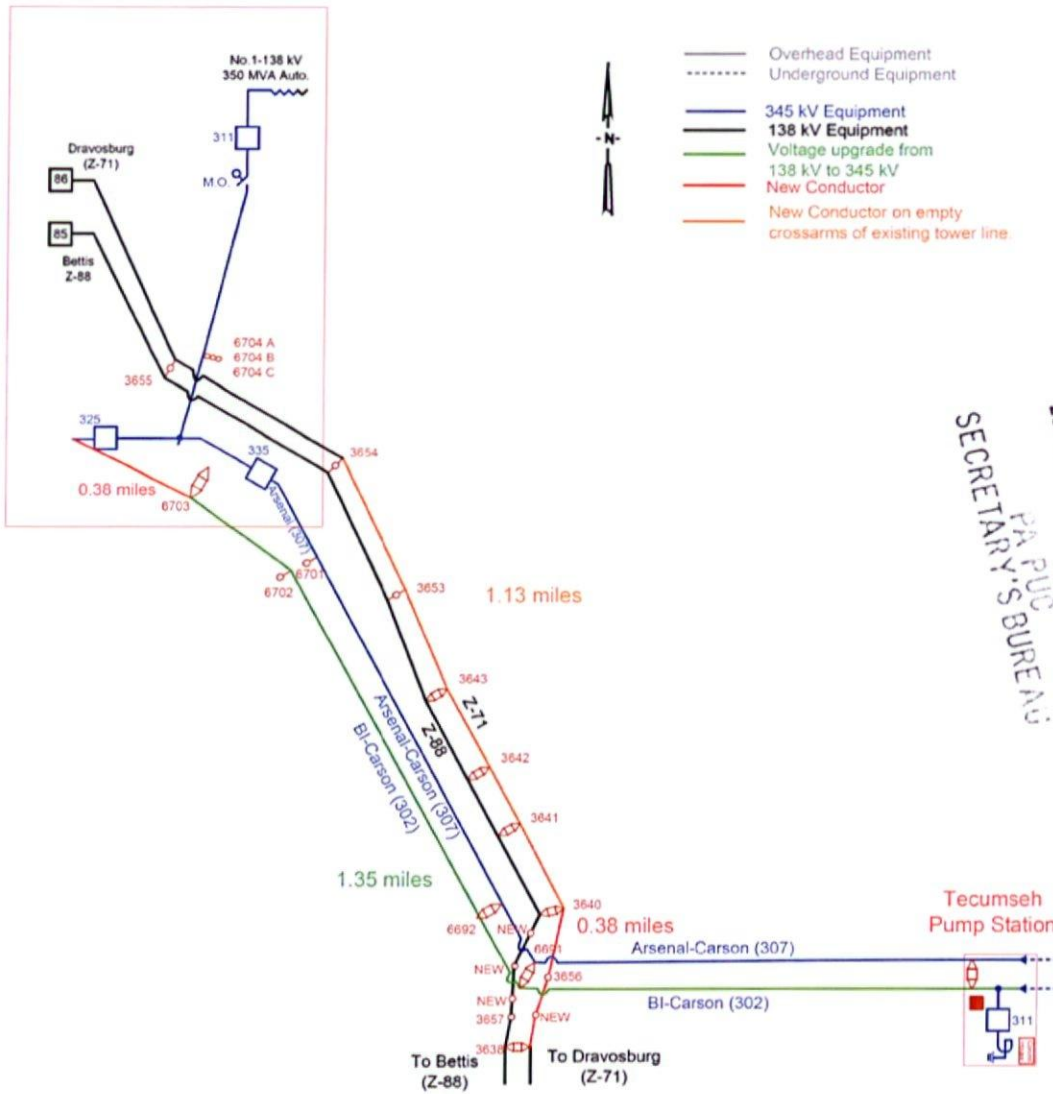
Carson Substation



RECEIVED  
 2015 APR -2 PM 3:07  
 PA PUC  
 SECRETARY'S BUREAU

ATTACHMENT 2	 gai consultants
EXISTING Z-71, Z-88 AND 307 CONFIGURATION  DUQUESNE LIGHT COMPANY ALLEGHENY COUNTY, PA	

Carson Substation



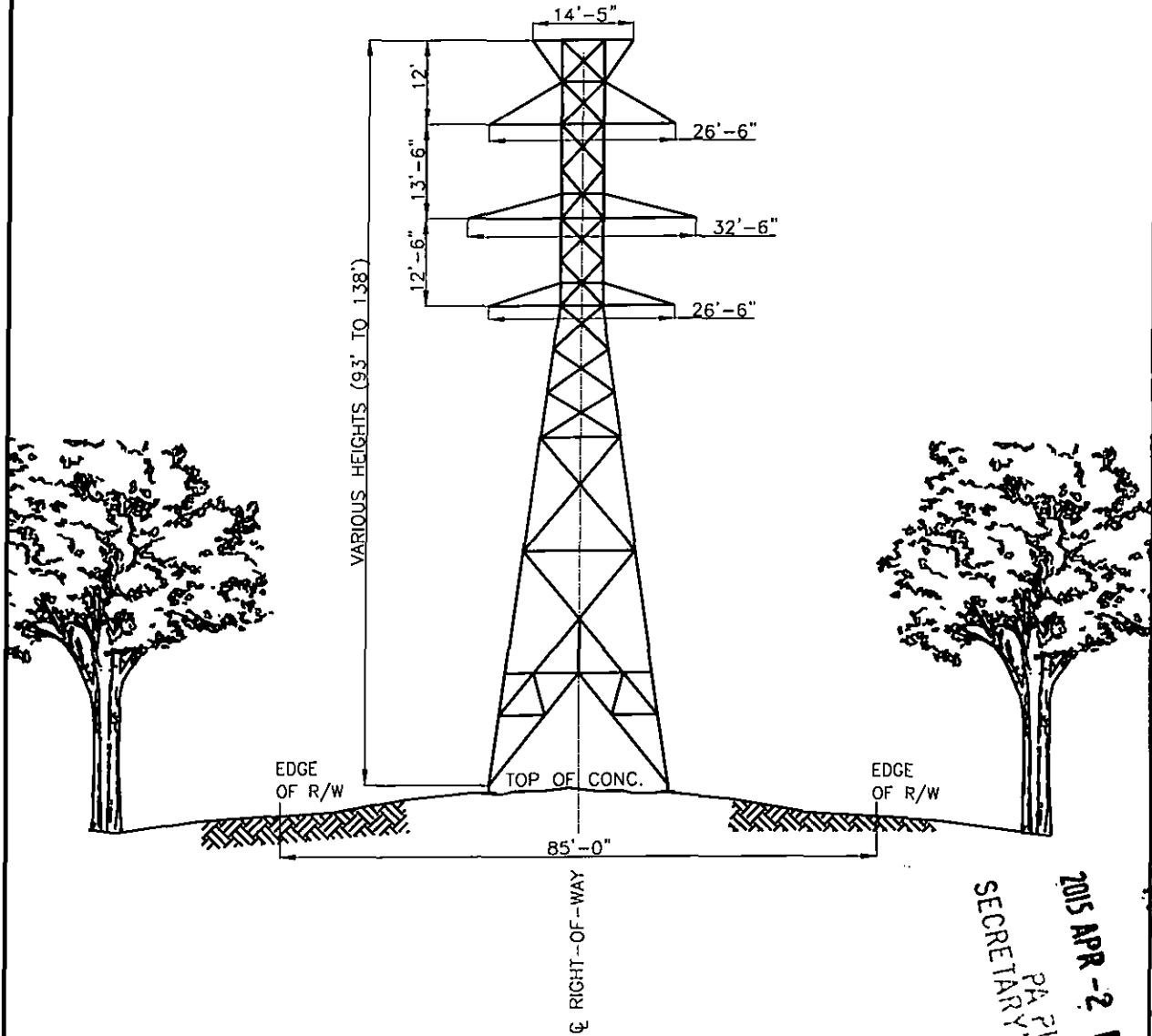
RECEIVED  
 2015 APR -2 PM 3:01  
 PA PUC  
 SECRETARY'S BUREAU

ATTACHMENT 3




PROPOSED  
 Z-71, Z-88 AND 307  
 CONFIGURATION

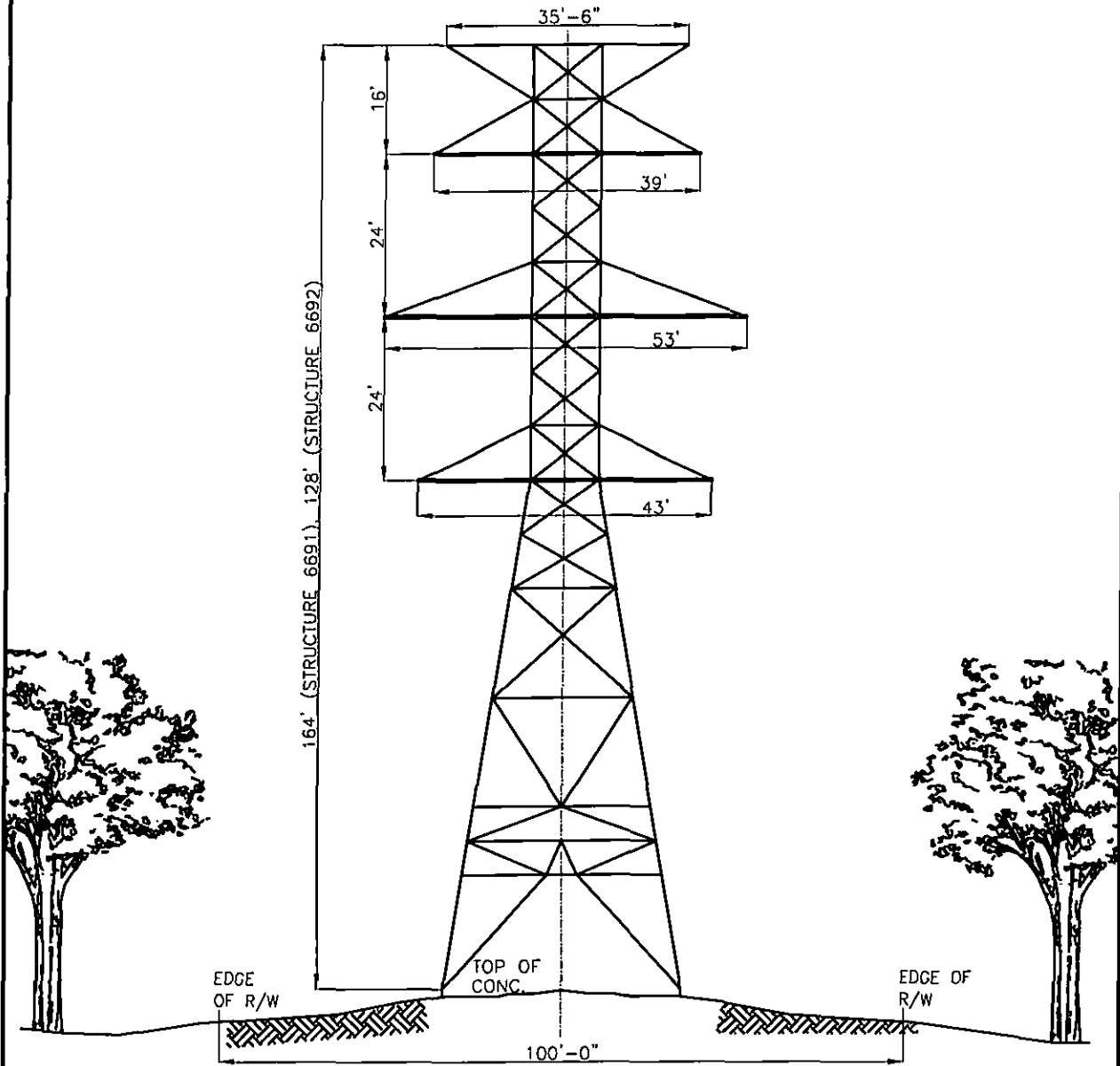
DUQUESNE LIGHT COMPANY  
 ALLEGHENY COUNTY, PA



⊕ RIGHT-OF-WAY

RECEIVED  
 2015 APR -2 PM 3:01  
 PA PUC  
 SECRETARY'S BUREAU

ATTACHMENT 4	 gal consultants
TYPICAL CROSS SECTION 138kV LATTICE STEEL TOWER RIGHT-OF-WAY DUQUESNE LIGHT COMPANY ALLEGHENY COUNTY, PA	



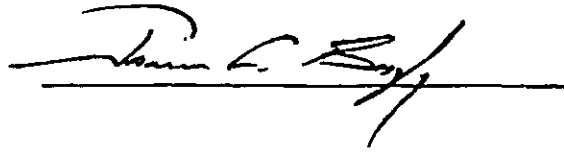
RECEIVED  
 2015 APR -2 PM 3:07  
 PA PUC  
 SECRETARY'S BUREAU  
 gci consultants

ATTACHMENT 5  
 TYPICAL CROSS SECTION  
 345KV LATTICE STEEL TOWER  
 RIGHT-OF-WAY  
 DUQUESNE LIGHT COMPANY  
 ALLEGHENY COUNTY, PA

**VERIFICATION**

I, **James F. Boyle, PE**, being the Senior 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: Mar 13, 2015



A handwritten signature in black ink, appearing to read "James F. Boyle", is written over a horizontal line.

RECEIVED  
2015 APR -2 PM 3:07  
PA PUC  
SECRETARY'S BUREAU

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **Letter of Notification** 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

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

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

Office of Small Business Advocate  
Commerce Building  
300 North Second Street, Suite 202  
Harrisburg, PA 17101

Housing Authority City of Pittsburgh  
200 Ross Street, Fl 9  
Pittsburgh, PA 15219-2014

Duquesne Light Co.  
1800 Seymour St.  
Pittsburgh, PA 15233-1134

Conrail  
Property Tax Dept.  
110 Franklin Road, SE,  
Roanoke, VA 24042-0002

St. Peters R C Church  
2821 Sarah St.  
Pittsburgh, PA 15203-2325

Anthony J. Arnold  
5646 Willow Terrace Dr.  
Bethel Park, PA 15102-3528

RECEIVED  
2015 APR -2 PM 3:06  
PA PUC  
SECRETARY'S BUREAU

William Mullins  
1006 Becks Run Rd.  
Pittsburgh, PA 15210-3112

Pittsburgh Development Group II LP  
3468 Brodhead Rd., Ste 7  
Monaca, PA 15061-3149

Denise Ann Petterson  
973 Becks Run Rd.  
Pittsburgh, PA 15210-3109


Guy W. & Doris J. Nadalin  
600 Becks Run Rd.  
Pittsburgh, PA 15210-3104

Pennsylvania Railroad Co.  
Property Tax Dept.  
110 Franklin Road, SE  
Roanoke, VA 24042-0002

Baltimore & Ohio RR Co. in PA  
Tax Dept. J910  
500 Water St.  
Jacksonville, FL 32202-4423

Almono LP  
210 6th Ave., Ste. 3620  
Pittsburgh, PA 15222-2602

Date: April 2, 2015

  
\_\_\_\_\_  
Christopher T. Wright

RECEIVED  
2015 APR -2 PM 3:06  
PA PUC  
SECRETARY'S BUREAU

RECEIVED  
2015 APR -2 PM 3:06  
PA PUC  
SECRETARY'S BUREAU