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January 5, 2018

**VIA ELECTRONIC FILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building, 2<sup>nd</sup> Floor  
400 North Street  
Harrisburg, PA 17120

**Re: Release and Waiver Agreement between Duquesne Light Company and the City of  
Pittsburgh Department of Public Works  
Docket No. U-2017-2637283**

Dear Secretary Chiavetta:

Enclosed for filing is Duquesne Light Company's Response to the Data Request of Technical Utility Section, regarding the Company's North Shore Underground Rehabilitation Project.

Should you have any questions, please do not hesitate to contact me 412-393-1541.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Tishekia E. Williams", with a long horizontal flourish extending to the right.

Tishekia E. Williams  
Attorney ID#208997

Enclosures  
cc: Jeff McCracken

Release and Waiver Agreement  
between Duquesne Light Company and the  
City of Pittsburgh Department of Public Works

Docket No. U-2017-2637283

Data Request of Technical Utility Section  
To Duquesne Light Company

Witness: Scott Ward, Robert Teachout

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TUS-1            Reference Release and Waiver Agreement – Please explain why Duquesne Light Company is responsible for the milling and paving of Allegheny Avenue and why they are paying the City of Pittsburgh Department of Public Works for this project.

**Response:**

Duquesne Light Company is responsible for the milling and paving of Allegheny Avenue because the work was performed as a part of the Company's North Shore Underground Rehabilitation Project.<sup>1</sup> Duquesne Light installed duct banks from the intersection of Ridge Road and Allegheny Avenue to the intersection of Allegheny Avenue and Liverpool Street to replace aging infrastructure. This work involved digging up the public roads. In accordance with the Division of Public Utilities, Department of Public Works, Duquesne Light is required to restore the paving to its original condition.

Additionally, Duquesne Light participates in a monthly coordination meeting with the City of Pittsburgh and other local utilities.<sup>2</sup> Through this process, Duquesne Light learned that the City of Pittsburgh recently solicited bids to complete milling and paving work in the North Shore area. Separately, Duquesne Light solicited competitive bids for the construction work related to the North Shore Underground Rehabilitation Project. The bids received by Duquesne Light directly through its solicitation process included costs for milling and paving that exceeded the prices obtained by the City of Pittsburgh Department of Public Works.<sup>3</sup> Accordingly, the Company agreed to allow the City of Pittsburgh's contractor to complete the milling and paving work, including the work required as a result of Duquesne Light's North Shore Underground Rehabilitation Project. Duquesne Light agreed to reimburse the City of Pittsburgh the lower rate

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<sup>1</sup> The North Shore Underground Rehabilitation Project is one of Duquesne Light's Long Term Infrastructure Improvement Projects.

<sup>2</sup> 52 Pa. Code § 121.3(a)(8) requires utility's to conduct outreach and coordination activities with other utilities, Department of Transportation and local governments regarding the planned maintenance/construction projects and roadways that may be impacted by the LTIP.

<sup>3</sup> The price secure by the Company through its competitive bid process is confidential and can be provided upon execution of a confidentiality agreement.

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of \$18.10 per square yard for the portion of the work that was required as a result of the  
Company's North Shore

Data Request of Technical Utility Section  
To Duquesne Light Company

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**TUS-1 Response Continued**

Underground Rehabilitation Project, resulting in substantial savings to the Company and ultimately our customers. Duquesne Light's reimbursement was limited to the restoration costs associated with its construction activities only. The Company did not reimburse the City of Pittsburgh for work performed unrelated to the North Shore Underground Rehabilitation Project.

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TUS-2      Reference Release and Waiver Agreement – Please explain how the price of \$18.10  
per square yard was determined.

Response:

See response to TUS-1.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Release and Waiver Agreement between  
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Docket No. U-2017-2637283

**VERIFICATION**

I, Scott Ward, 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 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).



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Scott Ward  
Director, Project Management

Date: December 22, 2017