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May 31, 2018

**Via Overnight Mailing**

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

RECEIVED

MAY 31 2018

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**Re: Letter of Notification of Duquesne Light Company, Filed Pursuant to 52 Pa. Code Chapter 57 Subchapter G, for Approval to Relocate and Construct Approximately 0.91 Miles of Double-Circuit 138 kV Transmission Line in Potter, Brighton, and Vanport Townships, Beaver County, Pennsylvania**  
**Docket No. A-2018-\_\_\_\_\_**

Dear Secretary Chiavetta:

Enclosed for filing is an original copy of the Letter of Notification of Duquesne Light Company, Filed Pursuant to 52 Pa. Code Chapter 57 Subchapter G, for Approval to Relocate and Construct Approximately 0.91 Miles of Double-Circuit 138 kV Transmission Line in Potter, Brighton, and Vanport Townships, Beaver County, Pennsylvania ("Letter of Notification"). Because this project has a proposed route of less than 2 miles, the Company is filing this Letter of Notification in lieu of a full siting application pursuant to 52 Pa. Code § 57.72(d)(1).

Please note that two Attachments accompanying this Letter of Notification are marked CONFIDENTIAL, and are being filed on a confidential basis under a separate cover.

Duquesne Light Company (the "Company") requests expedited consideration of the Letter of Notification. As described herein, the Company seeks to begin construction of this project in August of 2018 to accommodate other significant construction activities around the project site.



Should you have any questions, please do not hesitate to contact me.

Respectfully Submitted,

*Michael Zimmerman* <sup>EW</sup>

Michael W. Zimmerman  
Counsel, Regulatory

Enclosures

cc: Certificate of Service (non-Confidential Attachments)

RECEIVED  
MAY 31 2018  
PA PUBLIC UTILITY COMMISSION  
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 Approval : Docket No. A-2018-\_\_\_\_\_  
to Relocate and Construct :  
Approximately 0.91 Miles of Double- :  
Circuit 138 kV Transmission Line in :  
Potter, Brighton, and Vanport :  
Townships, Beaver County. :  
Pennsylvania :

**RECEIVED**  
MAY 31 2018  
PA PUBLIC UTILITY COMMISSION  
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**LETTER OF NOTIFICATION**

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TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Duquesne Light Company ("Duquesne Light") hereby files this Letter of Notification pursuant to 52 Pa. Code § 57.72(d)(1) and requests approval from the Pennsylvania Public Utility Commission ("Commission") to relocate and construct approximately 0.91 miles of double-circuit 138 kilovolt ("kV") transmission lines to create a new river crossing over the Ohio River ("Project").<sup>1</sup> The Project is required for the continual safe and reliable operation of the transmission and distribution lines. The Project is located in Potter, Brighton, and Vanport Townships, Beaver County, Pennsylvania. Duquesne Light has provided information regarding this Project to these political subdivisions, which have not objected to the proposed Project.

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<sup>1</sup> Approximately 0.91 miles of single-circuit 69 kV and single-circuit 23 kV transmission lines will also be relocated as part of the Project. The new 69 kV and 23 kV single circuits will occupy the same right-of-way, utilizing the same tower structures. Duquesne Light has no plans in the foreseeable future to operate the new 69 kV and 23 kV circuits at an operating voltage of 100 kV and above, which would require additional changes to system. Because Duquesne Light does not need Commission approval to site, construct, or relocated transmission lines operating at less than 100 kV, the relocation of these 69 kV and 23 kV circuits are not the subject of this Letter of Notification but have been included for informational purposes only. See 52 Pa. Code § 57.71 (Commission approval is required for the siting and construction of HV transmission lines with a design voltage of 100 kV or greater).

Subject to Commission approval, construction of this Project is scheduled to begin in August 2018 to support an in-service date of February, 2019. In order to ensure that Duquesne Light is able to meet this in-service date, the Company requests expedited review of this Letter of Notification. 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 attorney is:

Michael Zimmerman (Pa. I.D. No. 323715)  
Counsel, Regulatory  
Duquesne Light Company  
411 Seventh Avenue, 15<sup>th</sup> Floor  
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E-mail: [mzimmerman@duqlight.com](mailto:mzimmerman@duqlight.com)

Duquesne Light's attorney is 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. This Letter of Notification includes the following accompanying attachments:

- Attachment 1 CONFIDENTIAL Aerial Map of Proposed Facilities
- Attachment 2 CONFIDENTIAL Aerial Map of Existing Facilities
- Attachment 3 Typical Cross Section of Right-of-Way
- Attachment 4 Design Criteria and Safety Practices

7. CONFIDENTIAL Attachments 1 and 2 show critical energy infrastructure information regarding the bulk transmission system of Duquesne Light located within its certificated service territory in Pennsylvania. Duquesne Light is therefore submitting CONFIDENTIAL versions of Attachments 1 and 2.

8. 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**

9. 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.

10. 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.

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>2</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.

## **2. Existing System**

13. On January 15, 2015, Duquesne Light received Commission approval to, among other work, relocate approximately 1.6 miles of the double-circuit Potter-Valley (Z-81/Z-83) 138 kV Transmission Lines (formerly the Valley-Raccoon (Z-81/Z-83) 138 kV Transmission Lines) in order to accommodate a new Shell Chemical Appalachia LLC (“Shell”) ethane cracker plant

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<sup>2</sup> Duquesne Light’s reliability and planning standards are set forth in its FERC Form No. 715 annual report, *available at* <https://www.pjm.com/-/media/planning/planning-criteria/duquesne-light-company-planning-criteria.ashx?la=en>.

located in Potter and Center Townships, Beaver County, Pennsylvania.<sup>3</sup> The Commission-approved project was completed and placed in-service on or about June 30, 2016.<sup>4</sup>

14. The existing double-circuit Potter-Valley (Z-181/Z-183) 138 kV Transmission Lines currently extends approximately 1.3 miles (6,630 feet) from the Duquesne Light Potter 138 kV Substation to a point near the Vanport Highway Bridge on Interstate 376 where it transitions from an overhead facility to an underground facility.

15. The Potter-Valley (Z-181/Z-183) 138 kV Transmission Lines then proceed approximately 0.93 miles (4,950 feet) along the south bank of the Ohio River as an underground transmission line to a point where it transitions from an underground facility to an overhead facility where it crosses over the Ohio River.

16. The Potter-Valley (Z-181/Z-183) 138 kV Transmission Lines extend approximately 0.7 miles (3700 feet) from the south shore to the north shore of the Ohio River.

17. On the north shore of the Ohio River, the Potter-Valley (Z-181/Z-183) 138 kV Transmission Lines proceeds approximately 0.14 miles (760 feet) up a steep incline along Towers 4065-1, 4066-1, 4067, and 4068.

18. From Tower 4068, the Potter-Valley (Z-181/Z-183) 138 kV Transmission Lines continue approximately 4.32 miles to the Valley 138 kV Substation.

19. The Potter 138 kV Substation is also interconnected with the double-circuit Raccoon-Potter No. (Z-81/Z-83) 138 kV Transmission lines, which extend approximately 1.56 miles between the Potter Substation and the Raccoon Substation.

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<sup>3</sup> See *Letter of Notification of Duquesne Light Company, Filed Pursuant to 52 Pa. Code Chapter 57 Subchapter G, for Approval to Site and Relocate Approximately 1.6 Miles of Double-Circuit 138 kV Transmission Line in Potter and Center Townships, Beaver County, Pennsylvania, Docket No. A-2014-2451433 (Jan. 15, 2015).*

<sup>4</sup> As part of the Shell project, Duquesne Light's 69 kV ("66141") and 23 kV ("22831") circuits were also relocated to accommodate the new cracker plant. These lines will also be relocated as part of this proposed Project. See footnote 1, *supra*.

20. An aerial map depicting the current location of the existing facilities is provided as Attachment 1.

### 3. Need for the Project

21. The proposed Project is needed to replace aging, inaccessible infrastructure and provide a reliable permanent link between 138 kV transmission circuits on the north and south banks of the Ohio River at Potter Township.

22. Existing facilities along the south sides of the Ohio River require a permanent connection to facilities on the north side of the River to maintain reliability, which will be accomplished through the Project. Without such a connection, only the double-circuit Raccoon-Potter (Z-81/Z-83) 138 kV Transmission Lines would provide electricity at transmission voltages to the south side of the Ohio River in Potter Township. This transmission constraint may impact long-term reliability, as an event that causes a fault along one of the parallel circuits could also affect the other circuit. Additionally, certain maintenance activities could require both parallel circuits to be de-energized to safely perform the required work.

23. The proposed Project would also ameliorate reliability concerns associated with the placement of the existing Ohio River crossing. In late 2015 and early 2016, Duquesne Light relocated the Potter-Valley (Z-181/Z-183) 138 kV Transmission Lines in Potter Township.<sup>5</sup> As explained above, these circuits were routed into underground duct banks, where they run along the south bank of the Ohio River for approximately 4,950 feet, and then transition to an overhead facility and terminate at overhead riser structures near the Vanport Highway Bridge on Interstate 376. This route was chosen to accommodate a new, multibillion dollar ethane plant that Shell

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<sup>5</sup> Duquesne Light's Letter of Notification for this project was docketed at A-2014-2451433 and approved by Commission order on January 15, 2015.

Chemical Appalachia LLC ("Shell") is building on the south side of the Ohio River ("Shell cracker plant"). Shell paid for the costs of this relocation project.

24. Duquesne Light has subsequently identified potential reliability concerns associated with the current configuration. Duquesne Light therefore developed this proposed Project to run along an alternative, more direct route that establishes a permanent connection between facilities on either side of the Ohio River while largely avoiding the Shell cracker plant site.

25. In addition, Towers 4065-1, 4066-1, 4067, and 4068 supporting the Potter-Valley (Z-181/Z-183) 138 kV Transmission Lines on the north side of the Ohio River in Brighton and Vanport Townships need to be replaced. These tower structures' advanced age,<sup>6</sup> design, and location on a steep hillside restrict their accessibility and makes them difficult for maintenance teams to safely access, consistent with Occupational Safety and Health Agency fall protection regulations,<sup>7</sup> for maintenance and repair.

#### **B. THE PROPOSED PROJECT**

26. Duquesne Light proposes to resolve the above-described issues by relocating and constructing approximately 0.91 miles of double-circuit 138 kV transmission lines to create a new river crossing over the Ohio River Project for the Potter-Valley (Z-181/Z-183) 138 kV Transmission Lines.<sup>8</sup> This Project will provide a more reliable connection of the transmission circuits on the north and south banks of the Ohio River, replace aging infrastructure, and provide better accessibility for maintenance and operations.

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<sup>6</sup> These structures were installed in 1972.

<sup>7</sup> See 29 C.F.R. Part 1926.

<sup>8</sup> The proposed Project also involves the relocation and construction of approximately 0.91 miles of single-circuit 69 kV and single-circuit 23 kV transmission lines will also be relocated as part of the Project.

27. As part of the proposed Project, Duquesne Light proposes to remove the existing segment of the Potter-Valley (Z-181/Z-183) 138 kV Transmission Lines that extends from the south shore of the Ohio River, crosses the Ohio River, and to Tower 4068 on the north shore of the Ohio River. As explained above, Towers 4065-1, 4066-1, 4067, and 4068 supporting the Potter-Valley (Z-181/Z-183) 138 kV Transmission Lines on the north side of the Ohio River are located on a steep incline and have reached an age and condition that they must be replaced. On the south shore of the Ohio River, Duquesne Light proposes to remove the approximately 0.93-mile underground segment of the Potter-Valley (Z-181/Z-183) 138 kV Transmission Lines.

28. Duquesne Light proposes to construct a new overhead segment of the Potter-Valley (Z-181/Z-183) 138 kV Transmission Lines that will cross the Ohio River. This new segment will extend approximately 0.91 miles from Tower 6782 on the south shore to Tower 4068 on the north shore of the Ohio River.

29. An aerial map depicting the location of the proposed facilities is provided as CONFIDENTIAL Attachment 1.

30. The new river crossing for the Potter-Valley (Z-181/Z-183) 138 kV Transmission Lines will require three sets (a total of six) new monopole structures on both sides of the Ohio River. The existing Tower 4068 on the north shore will be replaced by two new monopole structures (Structures 6842 and 6845) that will be 115-120 feet in height. In order to cross the Ohio River, two additional monopoles will be installed on each side of the river (Structures 6841 and 6844 on the north shore, and Structures 6840 and 6843 on the south shore) that will be 177-186 feet in height. Each new monopole will be installed on concrete foundations and will support a single circuit.

31. These new monopole structures will be designed to meet the latest National Electric Safety Code (“NESC”) loading criteria and Duquesne Light design criteria. Additionally, these new monopole structures will comply with the Army Corps of Engineers (“ACE”) clearance requirements to the normal pool elevation of the Ohio River. No additional reinforcing of existing structures will be required.

32. Each relocated 138 kV circuit will consist of three (3) phase conductors and one shield wire. For the non-river crossing segments (both the north and south shores of the Ohio River), the new 138 kV conductors will utilize 853.7 kcmil<sup>9</sup> aluminum conductor aluminum alloy reinforced (“ACAR”) 24/13 conductors and one 7#8 Alumoweld overhead ground wire for lightning protection. For the river crossing, the new 138 kV conductors will utilize 958 kcmil trapezoidal aluminum conductor composite reinforced (“ACCR/TW”) Type 16 (22/19) Suwanee conductors and one 2AL/5AWD AWAC overhead ground wire for lightning protection.

33. The Project will follow the most direct route to connect the circuits on either side of the Ohio River, thereby minimizing the length of new transmission line required. This reduces the costs of installing and maintaining the Project, as well as enhancing its expected reliability.

34. The total estimated cost of the Project, including the 69 kV and 23 kV work, is approximately \$15.3 million.<sup>10</sup>

35. Subject to the Commission’s approval, construction of this Project is scheduled to begin in August 2018 to support an in-service date of February, 2019.

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<sup>9</sup> 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 mm<sup>2</sup>.

<sup>10</sup> The estimated cost for the proposed Project is an order-of-magnitude estimate developed using averages of recent costs for similar projects and without an in-depth analysis of field investigation. The estimated cost is subject to change as the constructability of the Project, sequence of construction, and other factors that may affect cost are identified and analyzed as the Project progresses.

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

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

37. 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.

38. The Project will conform to Duquesne Light's design criteria, construction standards, and safety practices. Descriptions of Duquesne Light's design criteria and safety practices are provided in Attachment 3 to this Letter of Notification.

39. No communication towers, pipelines, or other utilities will be affected by the proposed Project. Although there are pipelines in the nearby vicinity, the Project has been designed to not impact the pipelines.

40. The airport nearest to the proposed Project is the Sainovich Airport (PN43), a private landing strip located approximately 4.7 miles southwest of the Project. The next nearest airport is the Black Rock Airport (32PN), a private landing strip located approximately 4.8 miles northeast of the Project. The closest public airport is the Beaver County Airport (BVI), which is located approximately 6.7 miles north of the Project. Duquesne Light does not anticipate any interference with airport operations because of the distance from the Project area, the presence of existing electrical facilities in the Project area, and the similar height of the new facilities and the existing facilities. However, Duquesne Light will file all required documentation with the Federal Aviation Administration and the Pennsylvania Department of Transportation, Bureau of Aviation.

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

41. The proposed Project will extend a total of 0.91 miles, which will include the following segments: 0.14 miles on the north shore of the Ohio River in Brighton and Vanport Townships; 0.07 miles on the south shore of the Ohio River in Potter Township; and 0.7 miles that will cross the Ohio River.

42. Duquesne Light has obtained all required right-of-way needed on both the north and south shores of the Ohio River.<sup>11</sup> No additional right-of-way is required for the proposed Project. The right-of-way will range from 480 to 520 feet in width, and will accommodate the relocated 138 kV circuits and the parallel 69 kV and 23 kV circuits that also will be relocated as part of this Project. A typical cross section of the right-of-way for this Project is provided in Attachment 4 to this Letter of Notification.

43. Duquesne Light will obtain a submerged land lease and/or license agreement from Pennsylvania Department of Environmental Protection ("DEP") for the new 0.7-mile crossing of the Ohio River.

44. 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 Project will extend primarily over the Ohio River, where no vegetation management will be required. As a result, limited vegetation management will be required for this Project.

45. 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

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<sup>11</sup> Additionally, Duquesne Light has acquired temporary right-of-way for access roads, both for installing new structures and removing old infrastructure.

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>12</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.

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

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

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

49. Duquesne Light will review the proposed Project with the Pennsylvania State Historic Preservation Office ("PA SHPO") 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 PA SHPO.

50. 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.

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<sup>12</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.

51. Duquesne Light has reviewed the Pennsylvania Natural Diversity Inventory ("PNDI") records under the jurisdiction of the Pennsylvania Department of Conservation and Natural Resources ("PADCNR"), the Pennsylvania Fish and Boat Commission ("PFBC"), the Pennsylvania Game Commission ("PGC"), and the U.S. Fish and Wildlife Service ("USFWS"). Based on this review, no further review was required from the PADCNR, PGC, or USFWS. However, further review was required by the PFBC for the potential impacts to the black bullhead (*Ameiurus melas*). The PFBC subsequently determined, that given the nature of the project, no adverse impacts are expected to the species of concern. Notwithstanding, Duquesne Light will continue to consult with the jurisdictional agencies regarding potential impacts to protected species.

52. Duquesne Light will obtain all necessary permits from these state and federal agencies, and will comply with all of the terms and conditions placed on any permits required.

## V. NOTICE

53. Duquesne Light has provided information regarding the Project to representatives of Potter, Brighton, and Vanport Townships, and Beaver County. These entities have not objected to the proposed Project.

54. 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).

55. All landowners that may be affected by the proposed 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**

56. 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)(vi).

57. As explained above, the 138 kV transmission line work associated with this Project qualifies for use of a Letter of Notification because the proposed route is less than 2 miles.

58. 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. EXPEDITED REVIEW AND CONSIDERATION**

59. Duquesne Light further requests that the Commission consider this Letter of Notification on an expedited basis.

60. Duquesne Light requests expedited review because it seeks to place the Project in service by February, 2019. This proposed in-service date is motivated primarily by construction schedule.

61. As explained above, Shell is currently building a new, multibillion dollar ethane plant on the south side of the Ohio River. The proposed Project will run alongside, and terminate next to, the site of the cracker plant. Substantial long-term construction activities at and around the cracker plant site, including the area to be traversed by the Project, are anticipated to commence in summer of 2018. These construction activities are expected to slow slightly from September through December 2018, and resume in January 2019. Both Shell's anticipated construction activities, and construction of the Project, will likely require use of the same access road.

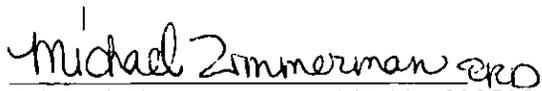
Duquesne Light seeks to complete the portion of Project construction around the Shell site during the autumn slowdown of Shell's construction activities, so as to minimize interference therewith.

62. Expedited review of this Letter of Notification will enable to Duquesne Light to complete construction of the Project without interfering with or otherwise delaying the ongoing construction of the cracker plant.

**VIII. CONCLUSION**

WHEREFORE, Duquesne Light Company respectfully requests that the Pennsylvania Public Utility Commission (i) consider this Letter of Notification on an expedited basis, and (ii) approve the siting and construction of the new approximately 0.91-mile river crossing of the Potter-Valley (Z-81/Z-83) 138 kV Transmission Lines as explained above and in the Attachments hereto.

Respectfully submitted,

  
Michael Zimmerman (Pa. I.D. No. 323715)  
Counsel, Regulatory  
Duquesne Light Company  
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Date: May 31, 2018

Attorney for Duquesne Light Company

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ATTACHMENT 1  
MAP OF PROPOSED FACILITIES

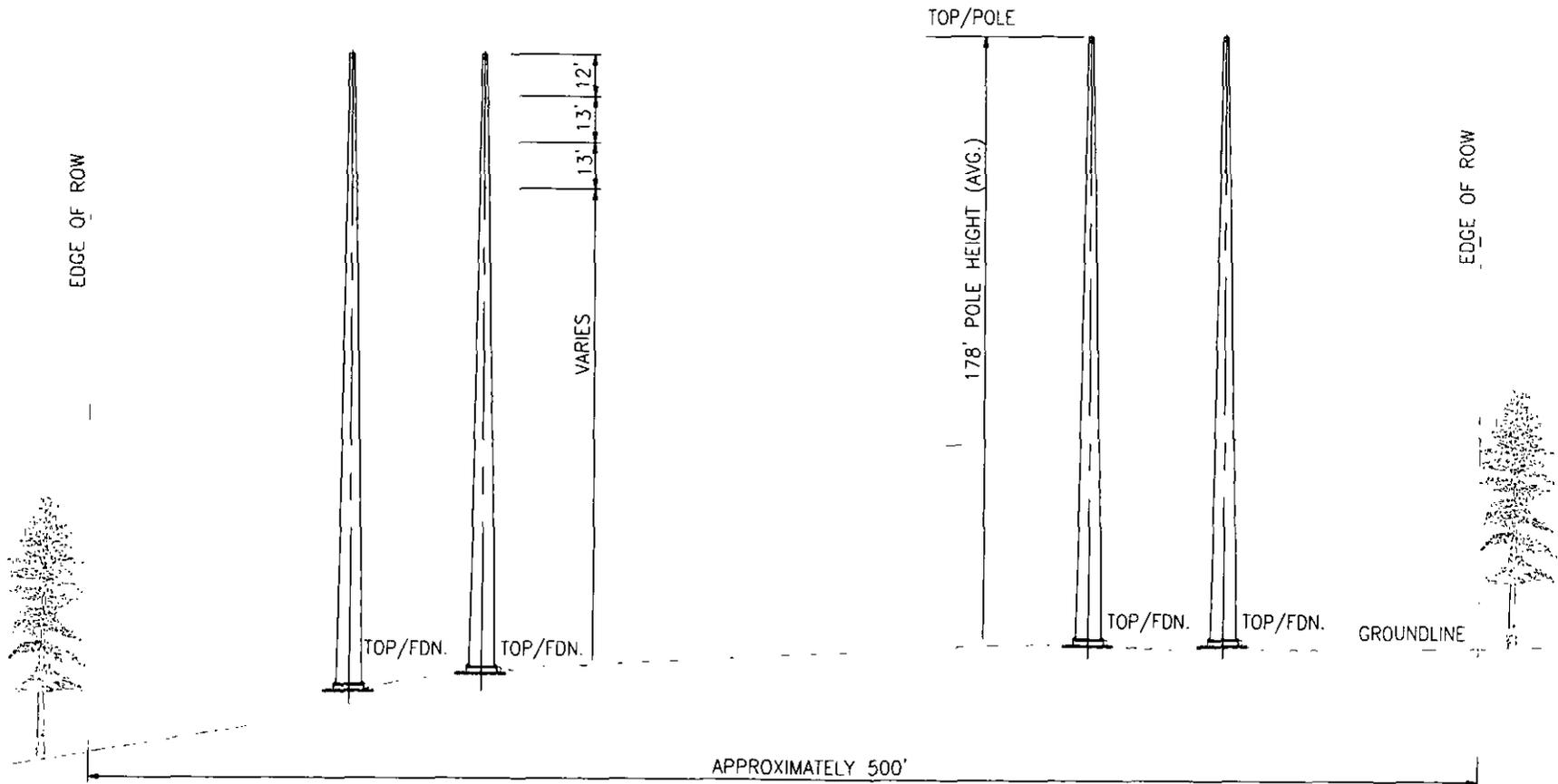
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ATTACHMENT 2  
MAP OF EXISTING FACILITIES

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ATTACHMENT 3



TYPICAL CROSS-SECTION  
STEEL POLE RIGHT-OF-WAY

DUQUESNE LIGHT COMPANY  
BEAVER COUNTY, PA

**I. Engineering Design Criteria**

The National Electrical Safety Code (NESC) is a set of rules to safeguard the general public during the installation, operation, and maintenance of electric power lines. The NESC contains the basic provisions considered necessary for the safety of employees and the general public. Some of these provisions are based on structure loads and operating clearances of the conductors. Although it is not intended as a design specification, its provisions establish minimum design requirements. Duquesne Light Company ("Duquesne Light") has developed design specifications and safety rules that meet or surpass all requirements specified by the NESC.

Engineering design criteria for all transmission line projects include NESC loading requirements and clearances for design, construction, and operation. NESC defines the "loads" on conductors and supporting structures, plus wind pressure on the conductors and supporting structures. Loading requirements are the loads on the conductors and structures that are anticipated assuming certain ice and wind conditions. Loading requirements always contain "safety factors" to allow for unknown or unanticipated contingencies. The clearances and loading requirements contained in the NESC were developed to ensure public safety and welfare.

**II. DLC transmission line design standards meet or surpass the NESC standards.**

According to the NESC standards, construction Grades B, C, or N<sup>1</sup> may be used for transmission lines (except at crossings of railroad tracks and limited access highways where Grade B construction is specified). However, Duquesne Light designs all of its transmission lines for Grade B construction. The use of Grade B design and construction specifies enhancements such as larger minimum cross arm dimensions, larger-minimum conductor size, and increased safety factors.

Duquesne Light also surpasses the NESC standards in its clearance requirements. Duquesne Light designs 138kV transmission lines to meet 30 feet of ground clearance under the worst-case load scenario, 9.4 feet more than the NESC minimum of 20.6 feet, for new construction. For reconductor projects and spans with new structures, Duquesne Light strives to obtain either 30 feet of ground clearance or NESC+10%, modifying existing structures as necessary to meet this criteria. For all other clearances, NESC+10% is used.

Another example in which Duquesne Light surpasses the NESC standards is in the structure overload factors. Duquesne Light applies overload factors of 1.1 for NESC 250C and NESC 250D loads, compared to the NESC requirement of using 1.0 overload factors for NESC 250C and NESC 250D loads.

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<sup>1</sup> The relative order of grades of construction for conductors and supporting structures is B, C, and N; Grade B being the highest grade.

### **III. Periodic Maintenance Program on All Transmission Lines**

Duquesne Light ensures the continued public safety from our transmission line infrastructure through various maintenance and inspection programs. One program is the routine inspection of as-built conditions to meet clearance requirements described above through advanced surveying technology referred to as "LiDAR". This technology allows Duquesne Light to model its transmission system three-dimensionally to analyze clearances from the conductors to the world around them, including vegetation, homes, pools, roads, and more. This program provides Duquesne Light with accurate as-built records to ensure compliance with designs while also identifying any new or changing conditions in the surrounding landscape.

Other Duquesne Light Maintenance programs for inspected towers include:

- a. Ground inspections, performed by Duquesne Light mobile workers walking around the base of the structure, on approximately 350 structures annually. These inspections focus heavily on foundations, structure integrity, and failed hardware, though additional information may be noted.
- b. Aerial inspections, performed by a Duquesne Light subcontractor from a helicopter employing former Journey Linemen, utilizing telescoping lens cameras on approximately 500 structures annually. These inspections focus heavily on hardware and structural defects in tower members, though additional information may be noted.

### **IV. Personnel Safety Rules**

Duquesne Light follows OSHA regulations to ensure safe practices. These regulations are incorporated into the Duquesne Light employee Safety Handbook. Duquesne Light safety rules and good practices include the following:

1. Only qualified employees and trainees working under their direct supervision may work on or with exposed energized lines or parts of equipment operating at 50 volts or more, and must be familiar with the minimum approach distances as indicated by OSHA regulations.
2. Before work is commenced, a job briefing will be held with all employees to orient each employee as to:
  - a. The hazards associated with the job;
  - b. The work procedures involved;
  - c. Any special precautions to be taken;
  - d. All energy source controls; and
  - e. Personal protective equipment required.

Attachment 4  
Design Criteria and Safety Practices

3. When working in elevated locations above 4 feet, employees shall use appropriate fall protection systems. Each employee working from an aerial lift, bucket truck, or man lift shall use a full body harness and either a shock absorbing lanyard or self-retracting lanyard. Duquesne Light strives to ensure that all fall protection follows the OSHA regulations.
4. Prior to climbing towers and other similar structures, a competent person shall conduct a documented visual inspection to:
  - a. Determine type or work, materials, and construction methods required;
  - b. Determine physical condition of the structure;
  - c. Contact Engineering to determine if a structural analysis has been performed to identify tie off and anchorage points for construction activities;
  - d. Tie off and anchorage points follow the OSHA regulations, in which the tie off points can support 5,000 lbs per employee or a twice the impact load per employee; and
  - e. Determine the type of fall protection systems to be used, appropriate anchorage points and complete documented fall safety analysis.

All work is to be inspected prior to construction to evaluate the site conditions. If there are any concerns about the integrity of a structure, DLC Engineering is engaged to perform the appropriate investigation and analysis to provide guidance for safely completing the job.

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**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**

Pennsylvania Department of Environmental Protection  
Southwest Regional Office  
400 Waterfront Drive  
Pittsburgh, PA 15222  
Attn.: Ronald Schwartz

Pennsylvania Historical and Museum Commission  
State Historic Preservation Office  
Commonwealth Keystone Building, 2nd Floor  
400 North Street  
Harrisburg, PA 17120-0093  
Attn.: Douglas C. McLearen

Leslie S. Richards, Secretary  
Pennsylvania Department of Transportation  
Commonwealth Keystone Building  
400 North Street, 9th Floor  
Harrisburg, PA 17120  
Attn.: Jason D. Sharp  
Attn.: Dennis Ciufu

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

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

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

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Beaver County Conservation District  
156 Cowpath Road  
Aliquippa, PA 15001-5842  
Attn.: Katie Staudenmeier

Beaver County Board of Commissioners  
810 Third Street  
Beaver, PA 15009-2139  
Attn.: Daniel C. Camp III

Brighton Township Board of Supervisors  
1300 Brighton Road  
Beaver, PA 15009  
Attn.: John Curtaccio  
Attn.: Bryan K. Dehart

Potter Township Board of Supervisors  
2016 Mowry Road  
Monaca, PA 15061-2224  
Attn.: Rebecca Matsco  
Attn.: Earl Shamp

Vanport Township Board of Commissioners  
477 State Avenue  
Vanport, PA 15009  
Attn.: Ronald E. Nardick  
Attn.: Randy D. Morrow

U.S. Army Corps of Engineers, Pittsburgh District  
1000 Liberty Avenue  
Pittsburgh, PA 15222  
Attn.: Greg Curry

Federal Aviation Administration  
Mail Processing Center  
Southwest Regional Office  
Obstruction Evaluation Group  
10101 Hillwood Parkway  
Fort Worth, TX 76177  
Attn: Andrew Hollie

U.S. Fish and Wildlife Service  
Pennsylvania Field Office, Endangered Species Section  
110 Radnor Road, Suite 101  
State College, PA 16801  
Attn.: Robert M. Anderson

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Pennsylvania Department of Conservation and Natural Resources  
Bureau of Forestry, Ecological Services Section  
400 Market Street  
P.O. Box 8552  
Harrisburg, PA 17105-8552  
Attn.: Daniel A. Devlin

Pennsylvania Fish and Boat Commission  
Division of Environmental Services  
595 E. Rolling Ridge Drive  
Bellefonte, PA 16823  
Attn.: Heather Smiles

Pennsylvania Game Commission  
Bureau of Wildlife Habitat Management  
Division of Environmental Planning and Habitat Protection  
2001 Elmerton Avenue  
Harrisburg, PA 17110-9797  
Attn.: Peter F. Sussenbach

Associated Medical Specialists  
114 Woodlawn Drive  
Beaver, PA 15009

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

Robert & Kathyryne L. D'Antonio  
189 University Drive  
Aliquippa, PA 15001

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

Jochar Corp. c/o Paul Cirillo  
2797 Freeland Road  
Vanport, PA 16148

JLWD Properties LLC  
560 McIntyre Drive  
Beaver, PA 15009

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

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

Esmark  
685 State Street  
Vanport, PA 15009

Donald Lane Burrell  
385 Fletcher Drive  
Beaver, PA 15009

Teddy Eder  
690 Fletcher Road  
Beaver, PA 15009

Cynthia Lou Lokey  
1904 3rd Avenue  
Beaver Falls, PA 15010

Robert A. & Debbie Sue Ober  
275 Fletcher Road  
Beaver, PA 15009

Jane & Albert Ours  
P.O. Box 456  
Beaver, PA 15009

Andrew Petro  
107 Highland Wood Dr.  
Beaver, PA 15009

Linda Lee Ropon  
1111 Marshall Road  
Monaca, PA 15061

George L. Smith Jr. & Rose Mary Smith  
685 Fletcher Road  
Beaver, PA 15009

William E. Bailey  
1985 Tuscarawas Road  
Beaver, PA 15009

Louise Bango c/o James Bango  
624 Farm Lane  
Rochester, PA 15074

Linda G. Macom  
390 Fletcher Road  
Beaver, PA 15009

Benjamin Baker  
629 7th Avenue  
New Brighton, PA 15066

Lloyd & Karen Grimes  
1605 Sebring Road  
Beaver, PA 15009

Sunoco  
Energy Transfer Partners  
525 Fritztown Road  
Sinking Spring, PA 19068  
Attn: James Francisus

Shell Chemical Appalachia  
300 Frankfort Road  
Monaca, PA 15061  
Attn: Jason Eckhart

Date: May 31, 2018

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Michael Zimmerman ERD  
Michael Zimmerman  
Duquesne Light Company  
411 Seventh Avenue  
MD 15-7  
Pittsburgh, PA 15219  
Phone: 412-393-6268  
Email: [mzimmerman@duqlight.com](mailto:mzimmerman@duqlight.com)

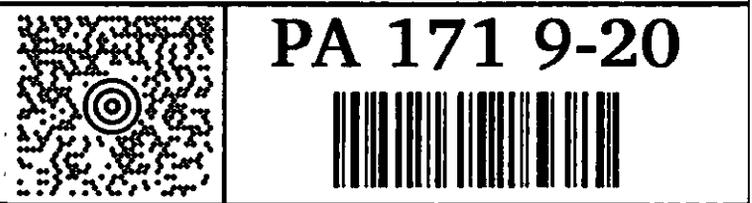
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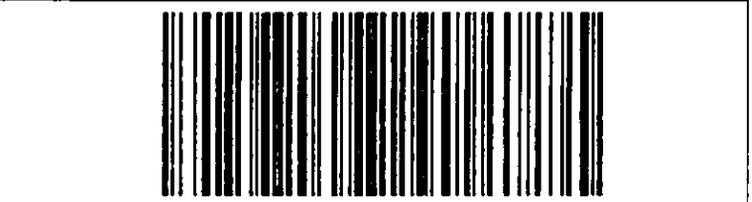
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PITTSBURGH PA 15219

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412-393-1541  
PENNSYLVANIA PUC  
400 NORTH STREET, 2ND FLOOR  
COMMONWEALTH KEYSTONE BUILDING  
HARRISBURG PA 17120-0093



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