



Emily M. Farah  
Counsel, Regulatory

411 Seventh Avenue  
Mail drop 15-7  
Pittsburgh, PA 15219

Tel: 412-393-6431  
efarah@duqlight.com

June 19, 2018

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**Via Overnight Delivery**

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

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

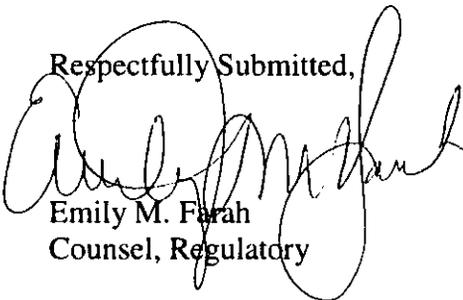
**Re: Application for Approval of Purchase  
Docket No. A-2018-\_\_\_\_\_**

Dear Secretary Chiavetta:

Enclosed you will find Application of Duquesne Light Company for Approval Pursuant to 66 Pa.C.S.A. § 1102(a)(3) for the Purchase of Two Parcels of Real Property on Forest Grove Road in Robinson Township, Pennsylvania and corresponding Exhibits. The Exhibits contain CONFIDENTIAL information and Duquesne Light requests the Exhibits not be made public record.

Copies of this filing will be served as indicated on the Certificate of Service as well as provided to potentially impacted property owners. If you have any questions, please feel free to contact me at 412-393-6431.

Respectfully Submitted,



Emily M. Farah  
Counsel, Regulatory

Enclosures

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Application of Duquesne Light Company** :  
**for Approval Pursuant to 66 Pa.C.S.A. §** :  
**1102(a)(3) for the Purchase of Two Parcels** : **Docket No. A-2018-\_\_\_\_\_**  
**of Real Property on Forest Grove Road in** :  
**Robinson Township, Pennsylvania** :

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**APPLICATION OF  
DUQUESNE LIGHT COMPANY**

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Duquesne Light Company (“Duquesne Light” or “the Company”) hereby submits an Application, pursuant to 66 Pa. C.S. § 1102(a)(3), requesting the approval of the Pennsylvania Public Utility Commission (“Commission”) for the purchase of two parcels of land at 2092 and 2094 Forest Grove Road, Robinson Township, Allegheny County Pennsylvania that will be used or useful in the Company’s public service (“the Parcels”). Duquesne Light will use the two Parcels in connection with the upgrade and reconfiguration of the 138 kV ring bus scheme at its Montour Substation. Approval of this Application by the Pennsylvania Public Utility Commission (“Commission”) is in the public interest because it will enhance the operability of Duquesne Light’s Montour Substation by allowing Duquesne Light to construct an improved access road for the Montour substation.

In support of its Application, Duquesne Light states as follows:

**A. Background**

1. The Applicant is Duquesne Light Company, a Pennsylvania public utility corporation with its principal place of business at 411 Seventh Avenue, Pittsburgh, PA 15219.

2. Duquesne Light is a public utility as the term is defined under Section 102 of the Public Utility Code, 66 Pa.C.S. § 102 certificated by the Commission to provide electric distribution service in portions of Allegheny County and Beaver County in Pennsylvania.

Duquesne Light is also an electric distribution company ("EDC") and a default service provider as defined under Section 2803 of the Public Utility Code. 66 Pa.C.S. § 2803.

3. Correspondence with respect to this Application should be addressed to Duquesne Light's attorneys:

Emily M. Farah (Pa. I.D. No. 322559)  
Tishekia E. Williams (Pa. I.D. No. 208997)  
Michael Zimmerman (Pa. I.D. No. 323715)  
Duquesne Light Company  
411 Seventh Avenue, 15th Fl.  
Pittsburgh, PA 15219  
Phone: 412-393-6431  
Fax: 412-393-5757  
E-mail:EFarah@duqlight.com  
E-mail:Twilliams@duqlight.com  
E-mail:Mzimmerman@duqlight.com

Duquesne Light's attorneys are authorized to electronically receive all notices and communications regarding this filing.

4. Duquesne Light's Montour Substation is located on property that the Company owns in Robinson Township, Allegheny County, Pennsylvania.

5. Duquesne Light intends to upgrade the existing 138 kV ring bus scheme at the Montour Substation to a breaker and a half bus scheme and upgrade associated structures, including: new breakers, disconnects, relays, control cables and other associated facilities

(hereafter "Montour Substation Project" or "Project"). The Company will be filing a separate Letter of Notification pursuant to 52 Pa. Code § 57.72(d) to request the Commission's approval for the relocation of three transmission lines that enter the Montour Substation.

6. Presently, Duquesne Light would have to alter the existing access road with the expansion, of Montour Substation which would change the grade of the access road to roughly a twelve percent (12%) grade.

7. To enhance safety and accessibility, Duquesne Light intends to purchase the parcels at 2092 Forest Grove Road and 2094 Forest Grove Road, in order to construct a new access road that will have less than a five percent (5%) grade.

**B. Description of the Parcels and the Proposed Purchase**

8. The Parcels at 2092 and 2094 Forest Grove Road are directly adjacent to the Duquesne Light-owned parcel on which the Montour Substation is located, and are currently encumbered by distribution rights-of way.

9. The Parcel at 2092 Forest Grove Road is owned by Jennifer L. Rubolino, a private individual that is not engaged in the provision of public utility service.

10. 2092 Forest Grove Road consists of approximately 0.92 acres of land, and is identified by Allegheny County Lot and Block No. 271-D-204.

11. The Parcel at 2094 Forest Grove Road is owned by Jason M. Rubolino, a private individual that is not engaged in the provision of public utility service.

12. 2094 Forest Grove Road consists of approximately 3.86 acres of land, and is identified by Allegheny County Lot and Block No. 271-D-208.

13. Duquesne Light and Jennifer L. Rubolino have executed a Letter of Intent for Duquesne Light to purchase the Parcel at 2092 Forest Grove Road. See Exhibit A.

14. Duquesne Light and Jason M. Rubolino have executed a Letter of Intent for Duquesne Light to purchase the Parcel at 2094 Forest Grove Road. See Exhibit B.

15. The purchase prices for both parcels were negotiated at arm's length.

16. Neither Jennifer L. Rubolino nor Jason M. Rubolino have any affiliation with Duquesne Light.

17. Both Jennifer L. Rubolino and Jason M. Rubolino were represented by legal counsel of their choosing during the negotiations for the sale of the Parcels.

18. The full amount of the consideration for the Parcels will be paid by Duquesne Light at closing, and Duquesne Light will be conveyed fee simple interests in both parcels upon closing, free and clear of any monetary liens and encumbrances.

**C. Requested Approvals**

19. Section 1102(a)(3) of the Public Utility Code provides, in relevant part, that a public utility must obtain Commission approval to acquire or transfer property that is used or useful in the public service (with certain exceptions).

20. The two Parcels, currently encumbered by rights-of-way, will be used and useful in Duquesne Light's public service when acquired in fee, because Duquesne Light will use the two Parcels in connection with the upgrade and reconfiguration of the 138 kV ring bus scheme at its Montour Substation, and for ongoing access to the Montour Substation.

21. Acquisition of the Parcels in fee by Duquesne Light will allow the Company to construct an access road to the Montour Substation that has a grade of less than 5%, compared to the modified grade of the existing access road, which is roughly 12%.

22. The new, less steep access road will allow better access to the Montour Substation for purposes of repair and maintenance of the Substation.

23. Approval of this Application by the Commission is in the public interest because allowing Duquesne Light to purchase the Parcels will enhance the operability of Duquesne Light's Montour Substation by allowing Duquesne Light to construct an improved access road for the Montour Substation.

24. Pursuant to 52 Pa. Code § 5.14, the notice requirements for this application are to be determined by Commission order. To facilitate notice, Duquesne Light is serving a copy of this filing on the Commission's Law Bureau, the Office of Consumer Advocate, the Office of Small Business Advocate, and counsel for the sellers of 2092 and 2094 Forest Grove Road

25. Duquesne Light requests that the Commission publish notice of this application in the Pennsylvania Bulletin at the earliest possible date and that the public protest and comment period for this application be set at 15 days after publication in the Pennsylvania Bulletin (pursuant to 52 Pa. Code § 5.14(b)).

26. Duquesne Light requests that the Commission issue its order at a public meeting at or before 60 days from the date of the filing of this application.

**F. Conclusion**

For the foregoing reasons, Duquesne Light respectfully requests that the Commission:

1. Publish notice of this Application in the Pennsylvania Bulletin at the earliest possible date and declare that the public protest and comment period shall expire 15 days after such publication.

2. Issue an order on or before 60 days from the filing of this Application in which the Commission (a) authorizes Duquesne Light to purchase parcels of land at 2092 and 2094 Forest Grove Road, Robinson Township, Pennsylvania, as being consistent with the public

interest under Section 1102(a)(3) of the Public Utility Code, and (b) issuing such certificates to Duquesne Light as are required by the Commission's treatment of subpart (a) of this paragraph, including any certificate under Section 1102.

Respectfully submitted,



Emily M. Farah (Pa. I.D. No. 322559)  
Counsel, Regulatory  
Duquesne Light Company  
411 Seventh Avenue, 15<sup>th</sup> Floor  
Pittsburgh, PA 15219  
Phone - 412-393-6431  
Email - [efarah@duqlight.com](mailto:efarah@duqlight.com)

Date: June 19, 2018

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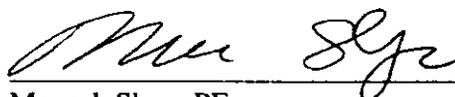
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SECRETARY'S BUREAU

**BEFORE THE  
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**1102(a)(3) for the Purchase of Two Parcels** : **Docket No. A-2018-\_\_\_\_\_**  
**of Real Property on Forest Grove Road in** :  
**Robinson Township, Pennsylvania** :

**VERIFICATION**

I, Meenah Shyu, PE, being the MANAGER of CIVIL AND TRANSMISSION LINE ENGINEERING 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).



Meenah Shyu, PE  
Manager, Civil & Transmission Line Engineering

Date: June 19, 2018

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of Real Property on Forest Grove Road in :  
Robinson Township, Pennsylvania :**

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the Certificate of Public Convenience and Exhibits upon the participants listed below in accordance with the requirements of 52 Pa. Code § 57.74(b) (relating to service of copies):

**VIA CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

Rick Urbano – Chairman  
Robinson Township Planning Commission  
1000 Church Hill Road  
Pittsburgh, PA 15205

Allegheny County Planning Commission  
Rich Fitzgerald – County Executive  
Allegheny County  
436 Grant Street  
Pittsburgh, PA 15219

Patrick McDonnell – Acting Secretary  
Department of Environmental Protection  
Rachel Carson State Office Building  
400 Market Street  
Harrisburg, PA 17101

Leslie S. Richards – Secretary  
PA Department of Transportation  
Keystone Building  
400 North St.  
Harrisburg, PA 17120

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Nancy Moses – Chairman  
Historical and Museum Commission  
State Museum Building  
300 North Street  
Harrisburg, PA 17120

Donna Killingsworth – Manager Real Estate  
Pittsburgh & Ohio Central RR Co, c/o Genesee & Wyoming Railroad Services, Inc.  
13901 Sutton Park Dr., S Suite 160  
Jacksonville, FL 32224

Donald Newman – Chairman of the Board  
Allegheny County Conservation District  
River Walk Corporate Center  
33 Terminal Way, Suite 325B  
Pittsburgh, PA 15219

John Soprano – Director  
Bureau of Enforcement and Investigation  
Penn Center, 2601 N. 3<sup>rd</sup> Street  
Harrisburg, PA 17110

Tanya J. McCloskey – Acting Consumer Advocate  
Pennsylvania Office of Consumer Advocate  
555 Walnut Street  
Forum Place, 5<sup>th</sup> Floor  
Harrisburg, PA 17101-1923

John R. Evans – Small Business Advocate  
Pennsylvania Office of Small Business  
300 North Second Street, Suite 202  
Harrisburg, PA 17101

Richard Kanaskie  
Bureau of Investigation & Enforcement  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor West  
PO Box 3265  
Harrisburg, PA 17105-3265

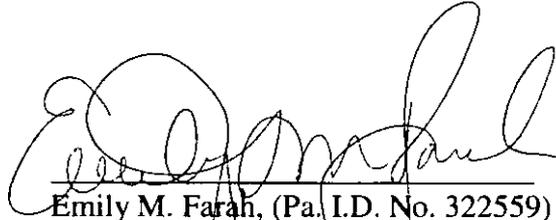
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Jennifer Lynn Rubolino  
2092 Forest Grove Road  
Coraopolis, PA 15108

Jason M. Rubolino  
2094 Forest Grove Road  
Coraopolis, PA 15108



Emily M. Farah, (Pa. I.D. No. 322559)  
Counsel, Regulatory  
Duquesne Light Company  
411 Seventh Avenue, 15<sup>th</sup> Floor  
Pittsburgh, PA 15219  
Phone: 412-393-6431  
Email: [efarah@duqlight.com](mailto:efarah@duqlight.com)

*Counsel for Duquesne Light Company*

Date: June 19, 2018

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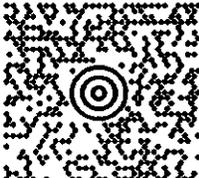
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BILLING: P/P		
Cost Center: 004 Reference # 2: Emily M. Farah		
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