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July 2, 2018

**Via Overnight Mailing**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, PA 17120

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JUL 02 2018

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**Re: Letter of Notification of Duquesne Light Company for Approval to Relocate and Construct 138 kV Transmission Lines in Beaver County, Pennsylvania.  
Docket No. A-2018-3002418**

Dear Secretary Chiavetta:

Enclosed please find Duquesne Light Company's responses to the Data Requests Propounded by the Bureau of Technical Utility Services ("TUS") Set I. Copies will be provided as indicated on the Certificate of Service.

Sincerely,

Michael Zimmerman

Enclosures

cc: Certificate of Service (non-CONFIDENTIAL responses only)  
Jordan Van Order (jvanorder@pa.gov)

**Bureau of Technical Utility Services  
Data Requests  
Docket No. A-2018-3002418**

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- A-1 Reference the Letter of Notification, Paragraph 10. Please state the PJM project identification number for the subject project.

This project will not have a significant impact on PJM planning or operational models and as such was not required to be incorporated into PJM's Regional Transmission Expansion Plan (RTEP) or assigned an identification number.

- A-2 Reference the Letter of Notification, Paragraph 24. Please explain whether the reliability concerns are the result of a new criteria which must be considered.

This project was motivated in part by new criteria to be considered. When initially developing plans for new distribution and transmission facilities related to the Shell cracker plant (including those facilities built as part of the letter of notification (LON) at Docket No. A-2014-2451433), the Company was constrained by the need to install the facilities within a short timeframe to accommodate Shell's construction timeline. At that time, the Company was not able to obtain all right-of-way required to construct a diagonal river crossing (as it has proposed to do here) in time to accommodate Shell's construction timeline. Accordingly, the Company sited the facilities along an alternative route as illustrated in Attachment 2 to the LON. As indicated in the previous LON at Docket No. A-2014-2451433, the Company sited these facilities along their current route at Shell's request and constructed them at Shell's cost.

Since 2015, there have been two relevant changes in circumstance. First, on June 3, 2016, excessive rainfall and surface water runoff damaged facilities that had been relocated to the south bank of the Ohio River. Specifically, the damage included three monopoles supporting 69 kV overhead facilities, and an underground duct bank containing 69 kV and 23 kV facilities.

Second, the Company has been able to acquire option agreements to secure the remaining right-of-way along its preferred diagonal river crossing route. Because of these two developments, Duquesne Light decided to relocate its facilities along the route as proposed in this LON rather than replace facilities on the south bank of the Ohio River, which remain potentially vulnerable to damage from subsequent surface water runoff. Additionally, this proposed relocation presents an opportunity for the Company to replace older existing structures supporting existing 138 kV facilities thus benefitting more customers, as discussed in the present LON.

- A-3 Reference the Letter of Notification, Paragraph 25. Please describe the physical condition of Towers 4065-1, 4066-1, 4067, and 4068.

Tower 4065-1 was constructed in 1972. The existing structure is in fair condition with spalling of galvanizing finish in some locations with minimal corrosion of steel members. The existing exposed foundations are in fair condition with minimal spalling, cracking, and pitting. It is a galvanized structure, and is approximately 99 feet tall. It carries

a total of six (6) conductors and two (2) shield wires. The tower does not have any fall protection systems for climbing the tower to perform maintenance work or inspections, which may pose OSHA compliance concerns. Due to the site location, providing bucket truck access to perform maintenance is not desirable.

Tower 4066-1 was constructed in 1972. The existing structure is in fair condition with spalling of galvanizing finish in some locations with minimal corrosion of steel members. The existing exposed foundations are in fair condition with minimal spalling, cracking, and pitting. It is a galvanized structure, and is approximately 120 feet tall. It carries a total of six (6) conductors and two (2) shield wires. The tower does not have any fall protection systems for climbing the tower to perform maintenance work or inspections, which may pose OSHA compliance concerns. Due to the site location, providing bucket truck access to perform maintenance is not desirable.

Tower 4067 was constructed in 1972. The existing structure is in fair condition with spalling of galvanizing finish in some locations with minimal corrosion of steel members. The existing exposed foundations are in fair condition with minimal spalling, cracking, and pitting. It is a galvanized structure, and is approximately 114 feet tall. It carries a total of six (6) conductors and two (2) shield wires. The tower does not have any fall protection systems for climbing the tower to perform maintenance work or inspections, which may pose OSHA compliance concerns. Due to the site location, providing bucket truck access to perform maintenance is not desirable.

Tower 4068 was constructed in 1972. The existing structure is in fair condition with spalling of galvanizing finish in some locations with minimal corrosion of steel members. The existing exposed foundations are in fair condition with minimal spalling, cracking, and pitting. It is a galvanized structure, and is approximately 116 feet tall. It carries a total of six (6) conductors and two (2) shield wires. The tower does not have any fall protection systems for climbing the tower to perform maintenance work or inspections, which may pose OSHA compliance concerns. Due to the site location, providing bucket truck access to perform maintenance is not desirable.

- A-4 Reference the Letter of Notification, Section II(A)(2) and Paragraph 27. Please explain whether any of the facilities to be removed or relocated were installed as part of the letter of notification at Docket No. A-2014-2451433. If so, please describe these facilities.

The underground segment of the Potter-Valley (Z-181/Z-183) 138 kV underground transmission line was installed as part of the 2014 filing. Duquesne Light is proposing to remove this facility and associated riser structures that transition the overhead to underground lines. These structures are proposed to be removed, because their sole purpose was for transitioning from overhead to underground and vice versa. This project further obviates the need for riser poles for the transition and the river crossing poles installed as part of the 2014 letter of notification, which are also to be removed.

Overhead structures #6772 and #6782 from the 2014 filing will be reutilized to connect the new overhead transmission lines with the existing overhead transmission lines.

- A-5 Reference the Letter of Notification, Paragraph 30. Please state the height of the existing structures to be removed.

Existing tower 4068 is approximately 116 feet tall.  
Existing tower 4067 is approximately 114 feet tall.  
Existing tower 4066-1 is approximately 120 feet tall.  
Existing tower 4065-1 is approximately 99 feet tall.  
Existing tower 2032 is approximately 51 feet tall.  
Existing tower 320 is approximately 146 feet tall.  
Existing monopoles 4064-1-P1 and 4064-1-P2 are approximately 190 feet tall.  
All existing riser poles to be removed are approximately 63 feet tall.

- A-6 Reference the Letter of Notification, Paragraph 31. Please provide the minimum designed conductor to ground vertical clearance where the proposed transmission line will cross the Ohio River.

The minimum clearance from the designed 138kV conductor (at the maximum operating temperature) to the 100 year flood elevation of the Ohio River is approximately 77 feet.

- A-7 Reference the Letter of Notification, Paragraph 34. Please state the cost of the 138 kV portion of the subject project.

The 138kV portion of the project is projected to cost approximately \$5.17 million.

- A-8 Reference the Letter of Notification, Paragraph 34. Please state the name of the individual or entity that will pay for the subject project.

Duquesne Light Company will pay for the project.

- A-9 Reference the Letter of Notification, Paragraph 42. Please state the names of the property owners from whom right-of-way will be obtained for the new and relocated 138 kV transmission line.

The Company has acquired right-of-way from the following property owners for the new and relocated 138 kV transmission facilities and associated access roads:

- Associated Medical Specialist
- Caryl and George Belich
- Robert and Kathyne D'Antonio
- Michael Dobish and Cherie Zercher
- Lloyd Grimes and Karen O'Neill
- Jochar Corp.
- JLWD Properties LLC
- Esmark
- Drug and Alcohol Services of Beaver Valley, Inc.
- GSC Real Estate, LP
- Sunoco Partners Marketing and Terminals LP
- Donald Lane Burrell
- Teddy Eder
- Cynthia Lokey

- Robert and Debbie Ober
- Jane and Albert Ours
- Andrew Petro
- George and Rose Mary Smith
- Benjamin Baker
- William Bailey
- Louise Bango
- Daniel and Leona Fike
- Linda Macom

A-10 Reference the Letter of Notification, Attachment 1. Please provide a copy of Attachment 1 which clearly shows the facilities that were installed as part of the letter of notification at Docket No. A-2014-2451433 and the facilities which will be removed or relocated as part of the subject project.

Please see CONFIDENTIAL TUS-A-10 Attachment A.

A-11 Please state the number of streams and wetlands which will be crossed.

The Project will cross the Ohio River and associated floodway and one wetland. The crossings are aerially spanned and no direct impacts are associated with the crossings. No permanent loss of wetlands or waterways is anticipated.

A-12 Please state whether any endangered or threatened species will be affected.

Potential conflicts for any endangered or threatened species was reviewed by the Pennsylvania Natural Diversity Inventory (PNDI) Internet Database. A letter from the Pennsylvania Fish and Boat Commission (PFBC) indicated that no adverse impacts are expected to the species of special concern. In early 2018, the project plans changed and a new consultation letter and mapping were provided to the PFBC. A second approval letter is expected from the PFBC prior to construction activities for the Species Impact Review.

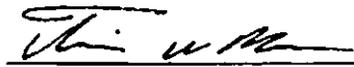
The PADCNR was consulted regarding the presence of Bleeding Heart (*Dicentra eximia*) plant within the project area. A concurrence letter was obtained from the PADCNR dated April 17, 2018, indicating that the direct impacts to *D. eximia* is not anticipated to be detrimental to the overall population. The recommended Conservation Measures include minimizing disturbance to the extent practicable and advising construction personnel of the presence of *D. eximia*. Several other measures related to equipment staging, monitoring and soil and seed bank conservation are also conditions of the concurrence letter.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Letter of Notification of	:	
Duquesne Light Company for	:	
Approval to Relocate and Construct	:	Docket No. A-2018-3002418
138 kV Transmission Lines in Beaver	:	
County, Pennsylvania	:	

**VERIFICATION**

I, Travis Moore, hereby state that the facts set forth above are true and correct to the best of my knowledge, information and belief, and 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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Dated: June 29, 2018

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing 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).

**FIRST CLASS MAIL**

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

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

Mr. & Mrs. Michael A. Dobish  
162 Southwood Park Road  
Moorestown, NC 28177

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

JLWD Properties LLC  
560 McIntyre Drive  
Beaver, PA 15009

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  
745 A Fletcher Road  
Beaver, PA 15009

Andrew Petro  
107 Highland Wood Dr.  
Beaver, PA 15009

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: July 2, 2018



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Michael Zimmerman  
Duquesne Light Company  
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Phone: 412-393-6268  
Email: [mzimmerman@duqlight.com](mailto:mzimmerman@duqlight.com)

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