



Emily M. Farah
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July 12, 2018

Via Electronic Filing

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

**Re: Letter of Notification of Duquesne Light Company for Approval to Reconfigure Existing and Construct New 138 kV Transmission Lines in Allegheny County, Pennsylvania
Docket No. A-2018-3002896**

Dear Secretary Chiavetta,

Enclosed please find a copy of Duquesne Light Company's responses to the Data Request of the Bureau of Technical Utility Services. Please feel free to contact me with any questions, comments, or concerns.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Emily M. Farah", is written over the typed name.

Emily M. Farah

Enclosures

cc: Jordan Van Order

**Bureau of Technical Utility Services
Data Requests to Duquesne Light Company**

Docket No. A-2018-3002896

Witness: Travis Moore

A-1 Reference the Letter of Notification, Section I, Page 2. Please state the anticipated in-service date for the proposed project.

Response:

As explained in the filing, the proposed project occurs in several phases, putting various sets of assets in service at different times, and resulting in various in-service dates. The anticipated in-service date for the proposed project, in its entirety, is December 31, 2020.

**Bureau of Technical Utility Services
Data Requests to Duquesne Light Company**

Docket No. A-2018-3002896

Witness: Jason Harchick
Set A-2

A-2 Reference the Letter of Notification, Paragraph 6. Please explain whether there is a PJM project identification number for the proposed project. If so, please provide the project number.

Response:

The transmission line construction associated with the Montour Substation 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.

The Montour substation configuration changes were communicated to PJM and incorporated into PJM's RTEP.

**Bureau of Technical Utility Services
Data Requests to Duquesne Light Company**

Docket No. A-2018-3002896

Witness: Meenah Shyu

A-3 Reference the Letter of Notification, Paragraph 10. Please explain whether any existing transmission line structures will be removed as part of the proposed project. If so, please state the approximate height of these structures.

Response:

As shown in Attachments 3 and 4, the following transmission line structures will be removed as part of the proposed project.

Transmission Line Structure	Approximate Height of Structure
351558	65 ft
351559	65 ft
351560	82 ft
351561	84 ft
32-4	93 ft

**Bureau of Technical Utility Services
Data Requests to Duquesne Light Company**

Docket No. A-2018-3002896

Witness: Travis Moore

A-4 Reference the Letter of Notification, Paragraph 17. Please state the name of the individual or entity that will pay for the proposed project.

Response:

Duquesne Light Company will pay for the proposed project.

**Bureau of Technical Utility Services
Data Requests to Duquesne Light Company**

Docket No. A-2018-3002896

Witness: Travis Moore

A-5 Reference the Letter of Notification, Paragraph 17. Please provide a breakdown of the project costs showing separately the cost for transmission line reconfiguration and substation work.

Response:

The project cost estimate can be broken down as follows:

Project Group	Project Cost
Montour Substation - Transmission	\$6.42M
Montour Substation - Distribution	\$9.2M
Grand Total	\$15.6M

As indicated in the filing, the estimated cost of the proposed project is \$15.6 million, with a 30% plus/minus certainty. Duquesne Light intends to engage in a competitive bidding process and will have a more accurate estimate and cost breakdown once vendors are selected.

**Bureau of Technical Utility Services
Data Requests to Duquesne Light Company**

Docket No. A-2018-3002896

Witness: Meenah Shyu

A-6 Reference the Letter of Notification, Section III(B). Please state the height of the new temporary and permanent transmission line structures to be installed.

Response:

The following temporary transmission line structures will be installed as part of the proposed project. Included in this response is a revised Attachment 3, which more clearly identifies the temporary transmission structures.

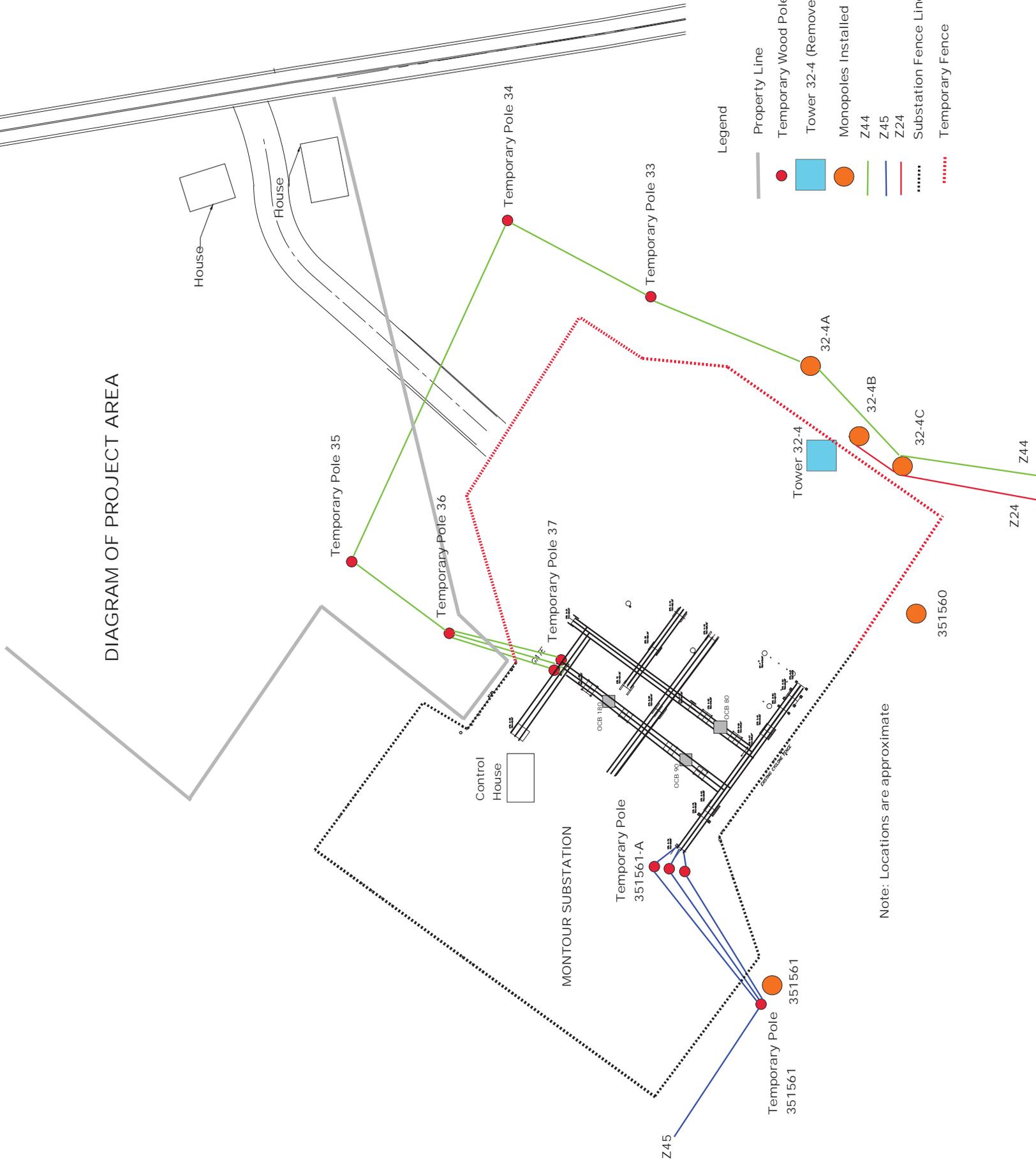
Temporary Transmission Line Wood Poles	Proposed Height of Wood Poles
351561 Temp	85 ft
351561-A Temp (3-wood pole structure)	60 ft /50 ft /60 ft
33 Temp	66 ft
34 Temp	70 ft
35 Temp	75 ft
36 Temp	61 ft
37 Temp (2-wood pole structure)	52 ft

The following permanent transmission line structures will be installed as part of the proposed project. Included in this response is a revised Attachment 4, which corrects a typographical error that inadvertently omitted the “5” from the “351560” permanent monopole.

Permanent Transmission Line Monopoles	Proposed Height of Monopoles
351560 New	75 ft
351561 New	80 ft
32-4A New	70 ft
32-4B New	80 ft
32-4C New	95 ft

REVISED
ATTACHMENT 3

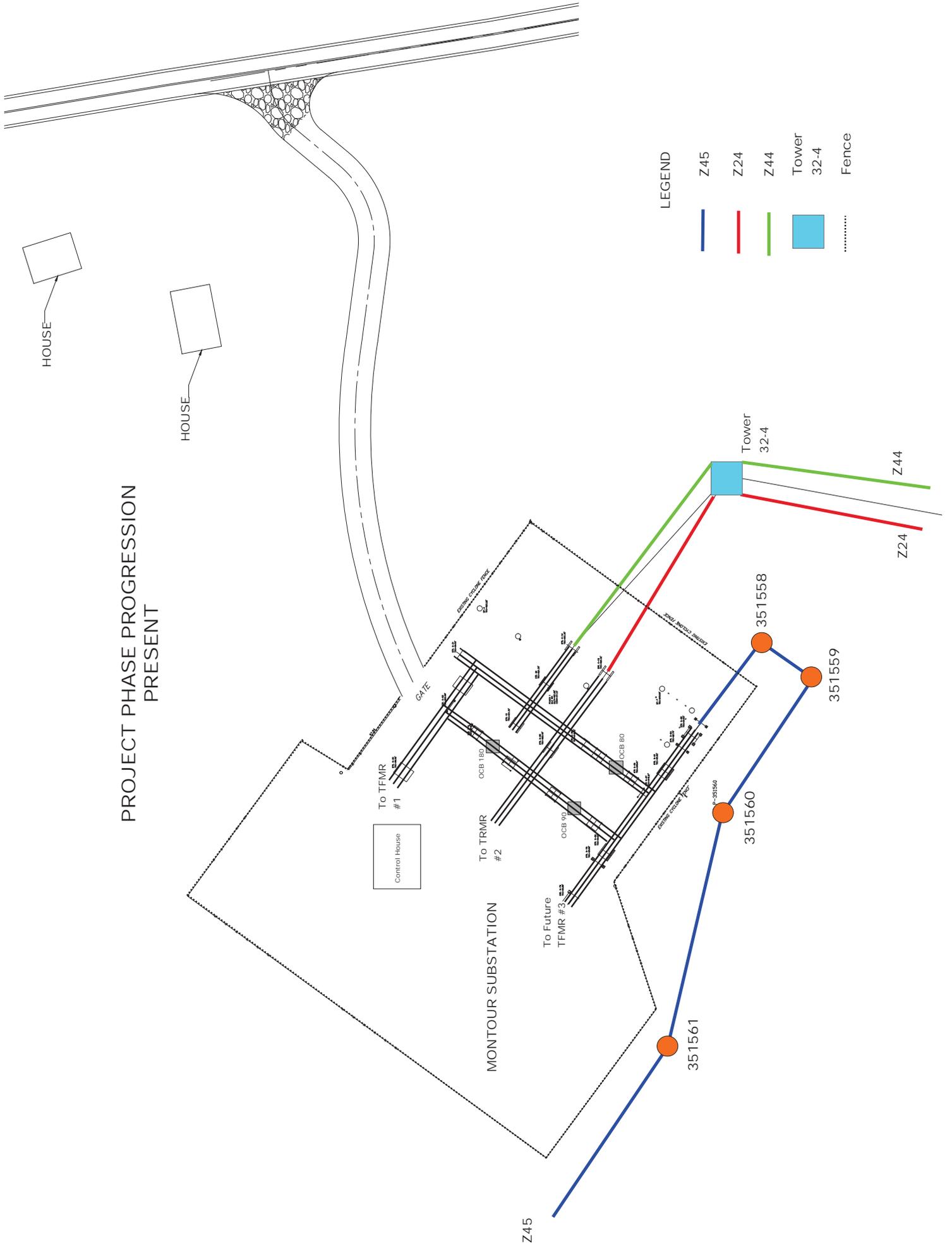
DIAGRAM OF PROJECT AREA



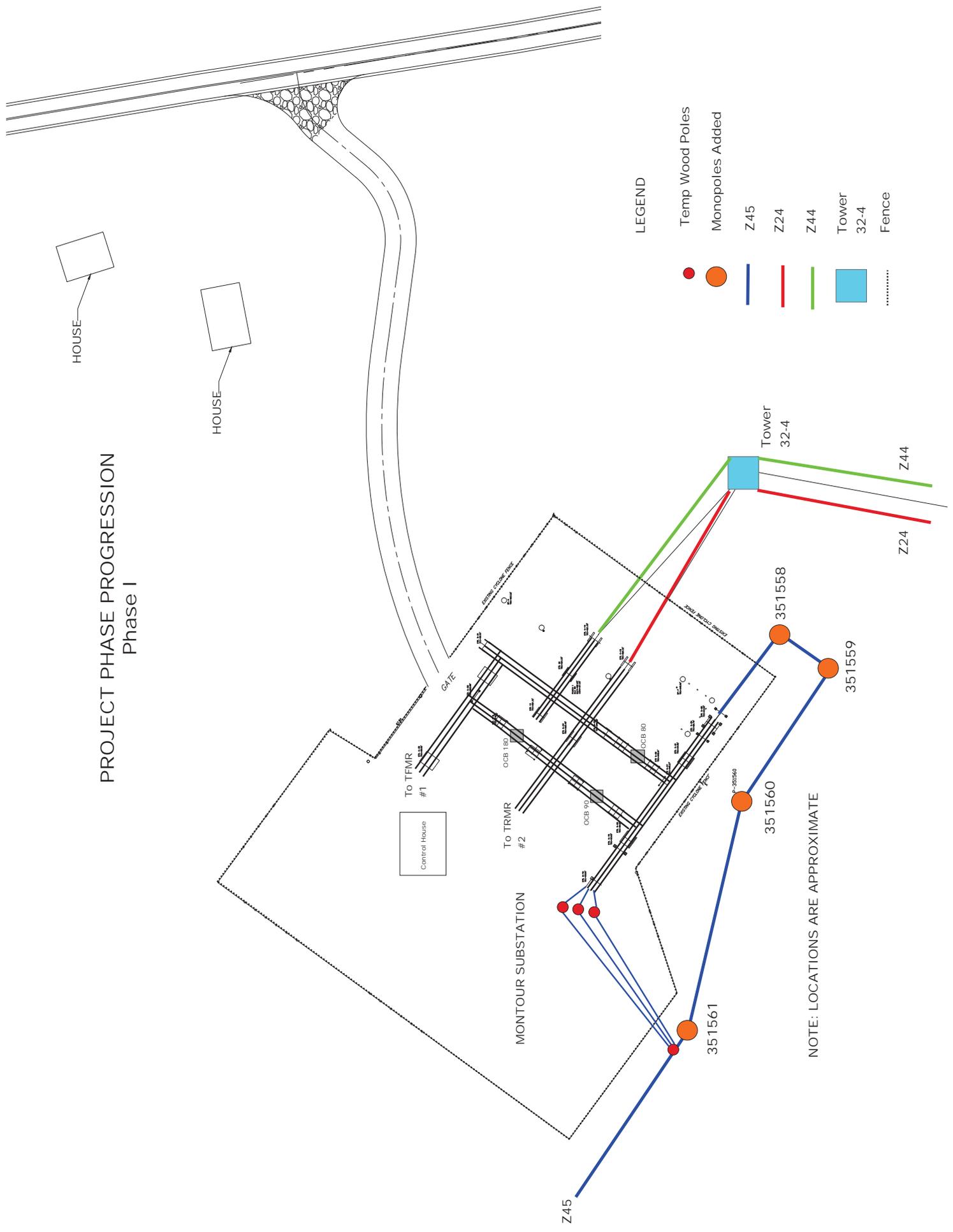
Note: Locations are approximate

REVISED
ATTACHMENT 4

PROJECT PHASE PROGRESSION PRESENT

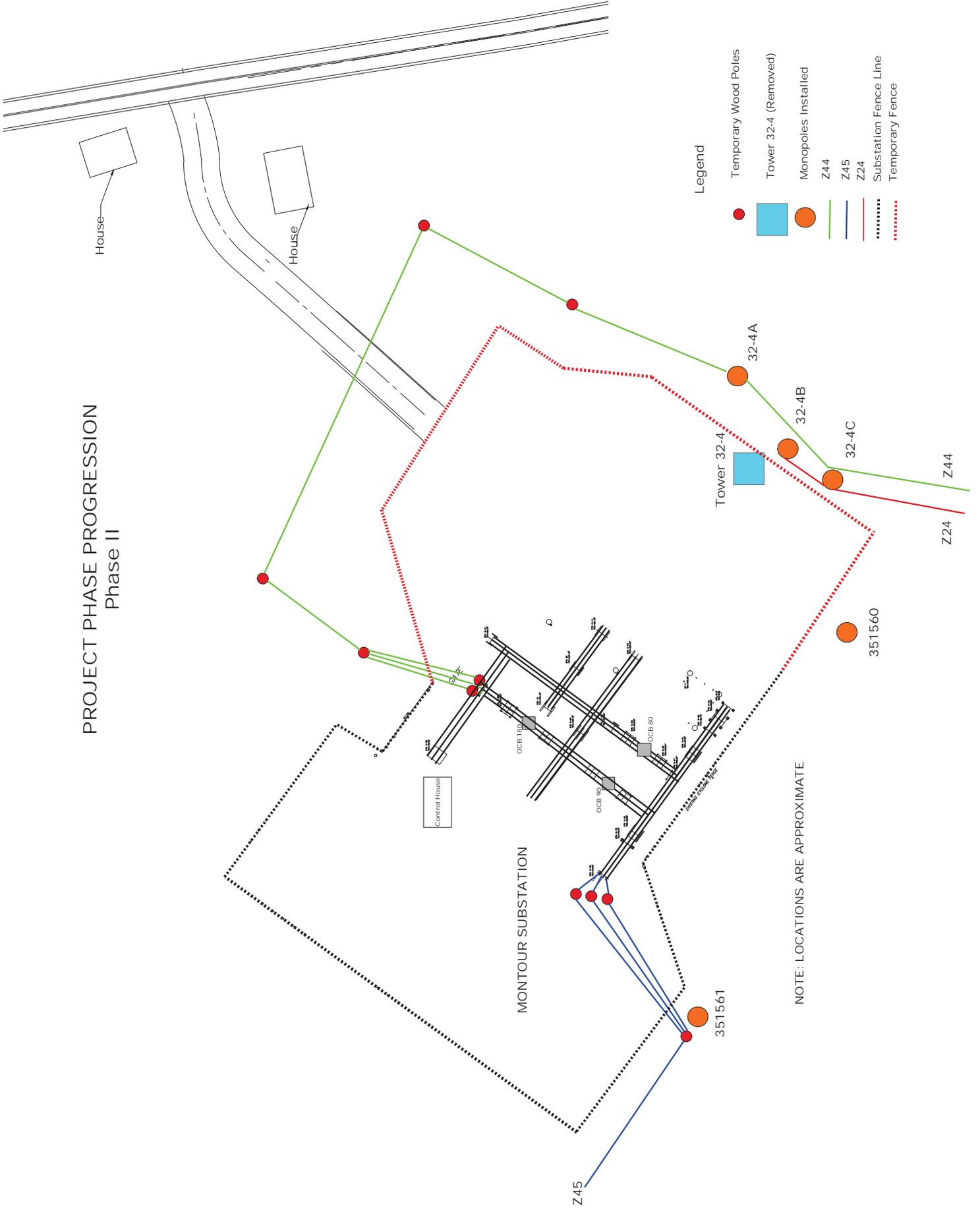


PROJECT PHASE PROGRESSION Phase I



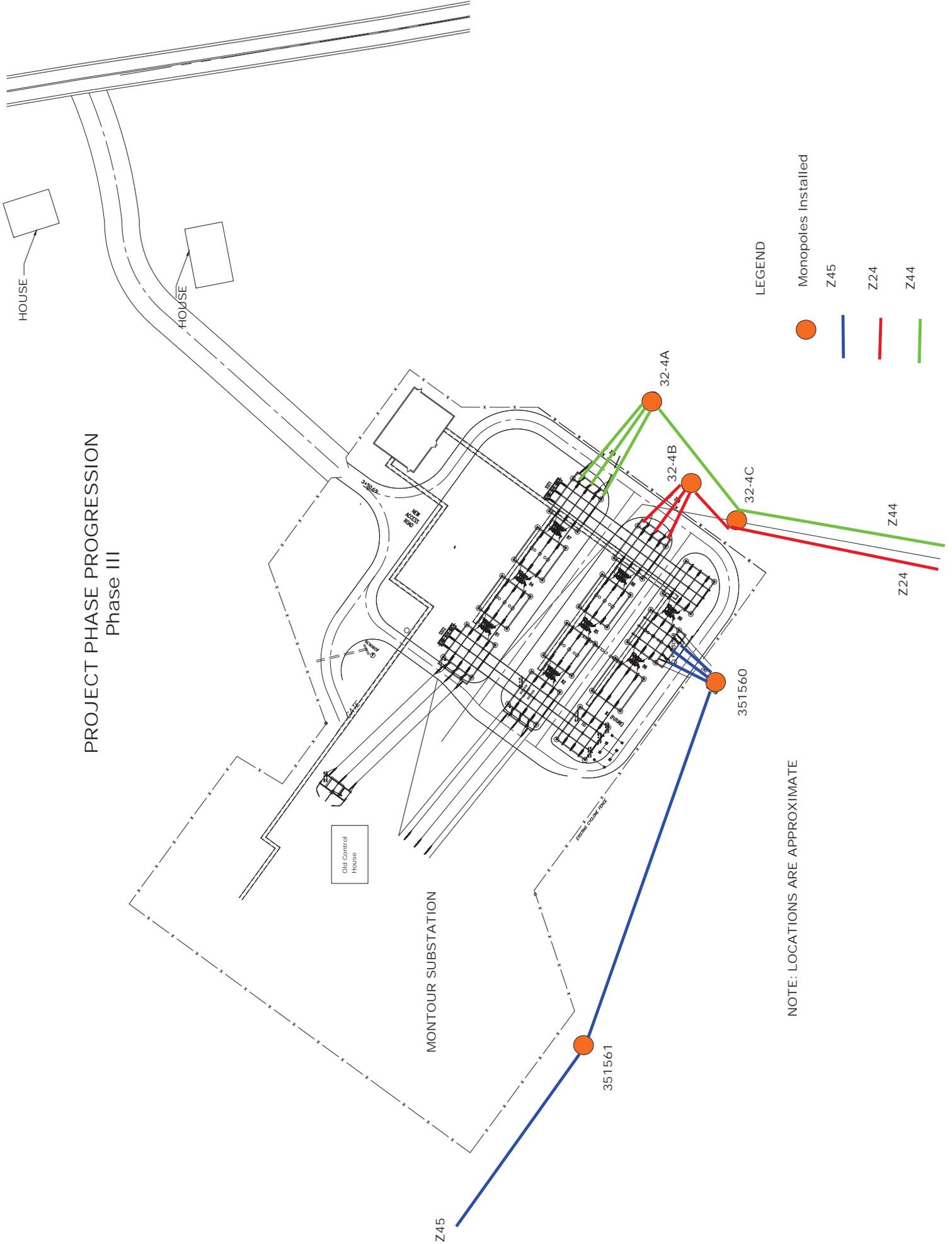
NOTE: LOCATIONS ARE APPROXIMATE

PROJECT PHASE PROGRESSION Phase II



NOTE: LOCATIONS ARE APPROXIMATE

PROJECT PHASE PROGRESSION Phase III



LEGEND

- Monopoles Installed
- Z45
- Z24
- Z44

NOTE: LOCATIONS ARE APPROXIMATE

**Bureau of Technical Utility Services
Data Requests to Duquesne Light Company**

Docket No. A-2018-3002896

Witness: Meenah Shyu

A-7 Reference the Letter of Notification, Section (III)(B). Please state the number of circuits on each of the affected transmission lines.

Response:

Montour is sourced by three (3) transmission lines and has two (2) 138-23 kV transformers with three (3) 23 kV busses with a total of seven (7) 23 kV distribution circuits and six (6) 23 kV sub-transmission circuits.

**Bureau of Technical Utility Services
Data Requests to Duquesne Light Company**

Docket No. A-2018-3002896

Witness: Meenah Shyu

A-8 Reference the Letter of Notification, Section III(B). Please state the age of the transmission lines to be reconfigured under the proposed project.

Response:

Existing transmission lines Z-24 and Z-44 were initially constructed in 1954 and were reductedored in 1964 as 138kV transmission lines. The Z-45 138kV transmission line was constructed in 1992.

**Bureau of Technical Utility Services
Data Requests to Duquesne Light Company**

Docket No. A-2018-3002896

Witness: Jason Harchick

A-9 Reference the Letter of Notification, Paragraph 19 and Attachment 1. Please state the number outages which have occurred in the past 5 years on the three distribution lines fed by the existing ring-bus. Additionally, please state the number of outages which would have mitigated by the proposed breaker and a half configuration.

Response:

Montour is sourced by three (3) transmission lines and has two (2) 138-23 kV transformers with three (3) 23 kV busses with a total of seven (7) 23 kV distribution circuits and six (6) 23 kV sub-transmission circuits.

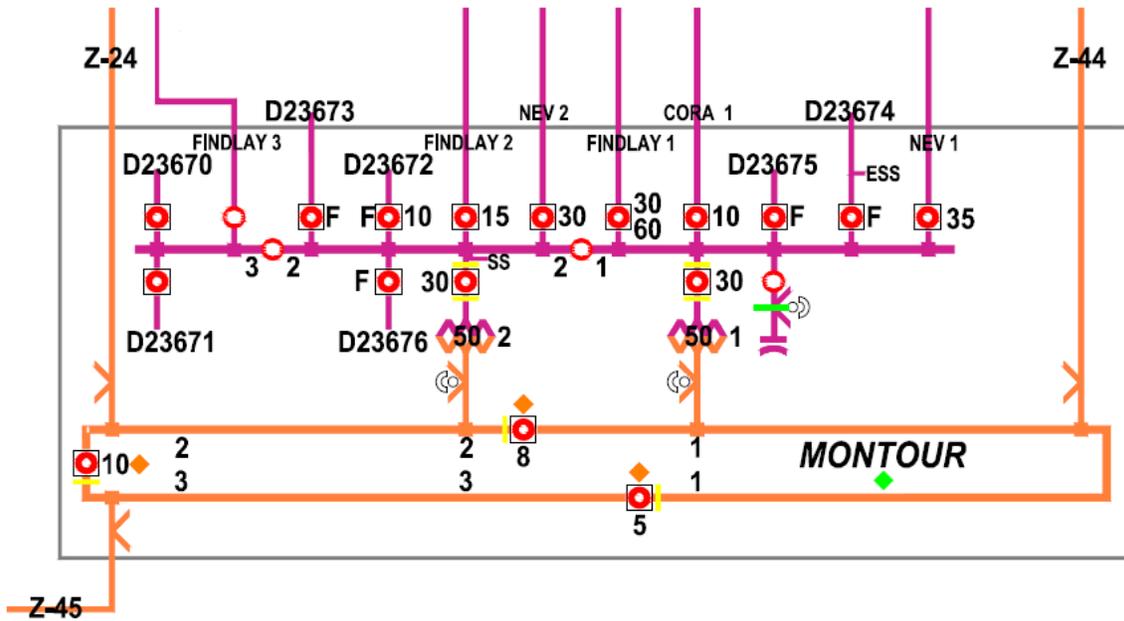
Over the past five (5) years, the Crescent-Montour (Z-24) 138 kV transmission line had a total of twenty-five (25) operations, including planned outages. Of these twenty-five (25) operations, three (3) were unplanned and resulted in the loss of the No. 2 23 kV transformer. During the same time period, the Brunot Island-Montour (Z-44) 138 kV transmission line had a total of forty-one (41) operations, of which two (2) were unplanned and resulted in the loss of the No. 1 23 kV transformer.

On March 31, 2018, the No. 1 138-23 kV transformer was out of service for replacement due to failure. A landslide occurred along the Crescent-Montour (Z-24) 138 kV transmission line which resulted in the operation of two (2) 138 kV tie breakers at Montour and the loss of the No. 2 138-23 kV transformer. With no 138-23 kV transformers in service at Montour, three (3) Findlay-Montour 23 kV sub-transmission lines started to overload even during the early morning on hours on a Saturday which is a lighter load period. Duquesne Light's Operations Center was able to remotely transfer load on its 23 kV distribution circuits to prevent further overloads of the 23 kV sub-transmission lines as well as prevent customer outages. However, had this event occurred during a higher load period, customers could have been directly impacted. The planned breaker and half configuration at Montour would have prevented this transmission line operation from causing an outage to any of the Montour 138-23 kV transformers.

Bureau of Technical Utility Services
Data Requests to Duquesne Light Company

Docket No. A-2018-3002896

Witness: Jason Harchick



**Bureau of Technical Utility Services
Data Requests to Duquesne Light Company**

Docket No. A-2018-3002896

Witness: Jason Harchick

A-10 Reference the Letter of Notification, Paragraph 20. Please state whether the transmission line capacity will be increased with the new protective relays. If so, please state the existing line rating and the new rating.

Response:

Duquesne Light evaluates transmission facility ratings at eight ambient temperature sets from 0°C to 35°C, in 5°C increments. For each of these ambient temperature sets, a normal, emergency and load dump rating is calculated. In total, each transmission facility has 24 ratings.

For both the Brunot Island-Montour (Z-24) and Crescent-Montour (Z-44) 138 kV transmission circuits, of the 24 ratings, 10 are presently limited by the transmission line, and 14 are limited by equipment at Montour. Looking at the 0°C Normal rating, both the Z-24 and Z-44 lines are presently rated 1164 A and limited by the relays at Montour. Once the Montour substation is rebuilt, both lines will be rated 1263 A at 0°C Normal, limited by the present overhead line conductor.

For the Montour-Findlay (Z-45) 138 kV transmission circuit, when both 138 kV breakers at Montour are in service, the facility is limited by the overhead transmission line conductor under all 24 ratings. The 0°C Normal rating for this facility with both breakers at Montour in service is 1281 A. However, under a contingency condition with one Montour tie breaker open, the line is limited by the relays at Montour for 14 of the 24 ratings. Under this operating condition, the 0°C Normal rating for Z-45 transmission line is 1164 A. Once the Montour substation is rebuilt, the Z-45 transmission line will have a rating of 1281 A at 0°C Normal, limited by the overhead line conductor under all operating conditions.

**Bureau of Technical Utility Services
Data Requests to Duquesne Light Company**

Docket No. A-2018-3002896

Witness: Meenah Shyu

A-11 Reference the Letter of Notification, Paragraph 29. Please state the number of streams and wetlands which will be crossed by the proposed project.

Response:

Duquesne Light does not anticipate the proposed project to cross any streams or wetlands.

**Bureau of Technical Utility Services
Data Requests to Duquesne Light Company**

Docket No. A-2018-3002896

Witness: Mark Hummel

A-12 Reference the Letter of Notification, Paragraph 36. Please state the width of the existing right-of-way.

Response:

Duquesne Light owns the property in its entirety, and therefore, there is no right-of-way related to the proposed project.

**Bureau of Technical Utility Services
Data Requests to Duquesne Light Company**

Docket No. A-2018-3002896

Witness:

A-13 Reference the Letter of Notification, Section H. Please provide a revised section which includes the statement required by 52 Pa. Code § 57.72(d)(4)(iv).

Response:

Please reference the errata to the Letter of Notification, filed on July 11, 2018, which provides a revised Section H. A copy of the errata filing is attached to this response.



Emily M. Farah
Counsel, Regulatory

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

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

July 11, 2018

Via Electronic Filing

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

**Re: Letter of Notification of Duquesne Light Company
Docket No. A-2018-3002896**

Dear Secretary Chiavetta:

On June 19, 2018, Duquesne Light Company ("Duquesne Light") filed a Letter of Notification of Duquesne Light Company, Filed Pursuant to 52 Pa. Code Chapter 57 Subchapter D, for Approval to Upgrade an Existing 138KV Ring Bus at Montour Substation in Robinson Township, Allegheny County, and corresponding Attachments. It was subsequently brought to the Company's attention that it inadvertently omitted language from 52 Pa. Code § 57.72(d)(4)(iv).

Enclosed herein is a replacement Section H that corrects the omission. If you have any questions, please feel free to contact me at 412-393-6431.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Emily M. Farah", is written over the typed name and title.

Emily M. Farah
Counsel, Regulatory

Enclosures

H. LETTER OF NOTIFICATION

35. 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)(iii) and 52 Pa. Code § 57.72(d)(1)(vi).

36. The transmission line work associated with this Project qualifies for use of a Letter of Notification under 52 Pa. Code § 57.72(d)(1)(iii) because the entire Project will be constructed entirely within property that is owned in fee by Duquesne Light Company and entirely within Duquesne Light's existing right(s)-of-way ("ROW").

37. It is Duquesne Light's position that the Project will not substantially alter the existing ROW.

38. The transmission line work associated with this Project further qualifies for use of a Letter of Notification because the existing transmission lines are being re-routed with no significant changes in the size, character, design or configuration of the conductors and it does not substantially alter the right-of-way beyond the property of Duquesne Light Company.

39. The transmission line work associated with this Project qualifies for use of a Letter of Notification under 52 Pa. Code § 57.72(d)(1)(vi) because the proposed transmission line has a proposed route of two (2) miles or less, as indicated in Paragraph 14, above.

40. This Letter of Notification is filed on June 19, 2018. 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.*

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Letter of Notification of Duquesne Light :
Company, Filed Pursuant to 52 Pa. Code :
Chapter 57 Subchapter D, for Approval to : Docket No. A-2018-3002896
Upgrade an Existing 138KV Ring Bus at :
Montour Substation in Robinson Township, :
Allegheny County. :
:

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the Letter of Notification and Attachments 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

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. 3rd Street
Harrisburg, PA 17110

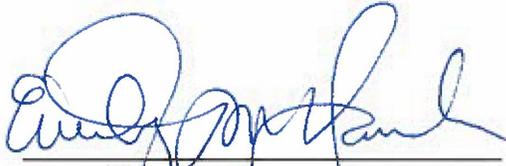
Tanya J. McCloskey – Acting Consumer Advocate
Pennsylvania Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923

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, 2nd Floor West
PO Box 3265
Harrisburg, PA 17105-3265

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, 15th Floor
Pittsburgh, PA 15219
Phone: 412-393-6431
Email: efarah@duqlight.com

Counsel for Duquesne Light Company

Date: July 11, 2018

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Letter of Notification of Duquesne Light :
Company, Filed Pursuant to 52 Pa. Code :
Chapter 57 Subchapter D, for Approval to : Docket No. A-2018-3002896
Upgrade an Existing 138KV Ring Bus at :
Montour Substation in Robinson Township, :
Allegheny County. :

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: 7/12/2018