



**Michael Zimmerman**  
Counsel, Regulatory

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

Tel: 412-393-6268  
mzimmerman@duqlight.com

July 16, 2018

**Via Overnight Mailing**

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

**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 II.

Sincerely,  


Michael Zimmerman

Enclosures

cc: Jordan Van Order, TUS (jvanorder@pa.gov)



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
400 NORTH STREET, HARRISBURG, PA 17120

IN REPLY PLEASE  
REFER TO OUR FILE

Docket No. A-2018-3002418  
Utility Code: 110150

**CERTIFIED**

MICHAEL W ZIMMERMAN  
DUQUESNE LIGHT COMPANY  
411 SEVENTH AVENUE  
PITTSBURGH PA 15219

Re: Letter of Notification of Duquesne Light Company for Approval to Relocate and Construct  
138 kV Transmission Lines in Beaver County, Pennsylvania.

Dear Mr. Zimmerman:

On May 31, 2018, Duquesne Light Company (Duquesne) filed a Letter of Notification (LON) for approval to relocate and construct 138 kV transmission lines in Potter, Brighton, and Vanport Townships, Beaver County, Pennsylvania. In order for us to complete our analysis of the subject application, the Bureau of Technical Utility Services requires answers to the enclosed data requests. This information is necessary for completion of our review of the filing.

Please be advised that you are directed to forward the requested information to the Commission **within seven (7) days** of receipt of this letter. Failure to respond may result in the LON being denied. As well, if Duquesne has decided to withdraw its filing, please reply notifying the Commission of such a decision.

Please forward the information to the Secretary of the Commission at the address listed below. When submitting documents, all documents requiring notary stamps must have original signatures. Please note that some responses may be e-filed to your case, <http://www.puc.pa.gov/efiling/default.aspx>. A list of document types allowed to be e-filed can be found at <http://www.puc.pa.gov/efiling/DocTypes.aspx>.

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

**Your answers should be verified per 52 Pa Code § 1.36.** Accordingly, you must provide the following statement with your responses:

I, \_\_\_\_\_, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn

falsification to authorities).

The blank should be filled in with the name of the appropriate company representative, and the signature of that representative should follow the statement.

In addition, to expedite analysis of the LON, please also e-mail the information to Jordan Van Order at [jvanorder@pa.gov](mailto:jvanorder@pa.gov). Please direct any questions to Jordan Van Order, Bureau of Technical Utility Services, at [jvanorder@pa.gov](mailto:jvanorder@pa.gov) (preferred) or 717-787-8763.

Sincerely,

Rosemary Chiavetta  
Secretary

Enclosure

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

- A-13 Reference Discovery, Response to A-2 and A-8. Please explain why Shell paid the construction of the facilities in 2014 and the Duquesne Light Company will pay for the subject project.

Duquesne Light will pay for the subject project because the project's primary function is to improve system reliability. The project will establish a 138 kV connection between the Valley and Raccoon Substations, improving reliability to the distribution customers served through those substations. Valley Substation serves roughly 31,303 distribution customers; Raccoon Substation serves roughly 22,561 distribution customers. The project would also provide a second source of electricity at transmission voltages to multiple existing larger customers on the south side of the Ohio River (including, but not limited to, Shell) that take service at transmission voltages. Finally, the improved structure accessibility and maintenance attributable to this project will benefit all customers in the area, as well as the Company itself.

- A-14 Reference Discovery, Response to A-3. Please state the anticipated service life of Towers 4065-1, 4066-1, 4067, and 4068.

The typical service life for a tower of the design of Towers 4065-1, 4066-1, 4067, and 4068 is 70 years. Many factors bear on the lifespan of a given structure, including environmental/weather conditions, the location of the structure relative to bodies of water and vegetation, the aggressiveness of maintenance activities, and the accessibility of the structure, and compliance with applicable safety requirements. These Towers' conditions are fair, and they are not at imminent risk of failure; however, Duquesne Light deems them to be at the end of their useful life because (1) due to their design and location, they cannot be modified to support the river crossing conductor or to meet latest NESC standards, and therefore cannot be reused as part of the proposed project; and (2) their location make them unsuitable for climbing consistent with current OSHA requirements, which restricts Duquesne Light's maintenance and inspection options.

- A-15 Reference Discovery, Response to A-3. Please state whether the current configuration of Towers 4065-1, 4066-1, 4067, and 4068 is or is not an OSHA compliance violation. If so, please explain, to date, how Duquesne has performed maintenance work and inspections on these towers.

The current configuration of Towers 4065-1, 4066-1, 4067, and 4068 is not, on its own, an OSHA compliance violation; however, due to the Towers' location and design, climbing the Towers could represent OSHA compliance concerns. The Company has avoided such OSHA compliance concerns by conducting inspections and repairs through ground visuals and bucket truck access. The proposed new steel monopoles will include fall arrest systems that ameliorate OSHA concerns, which will allow Company personnel to climb the structures to conduct inspections and repairs.

A-16 Reference Discovery, Response to A-4. Please state the approximate cost for the materials and construction of the 138 kV facilities which were installed in 2014 and are proposed to be removed under the subject project.

The approximate cost for the materials and construction of the 138 kV facilities which were installed in 2014 and are proposed to be removed under the subject project is \$4.5 million.

A-17 Reference Discovery, Response to A-4. Please explain what percentage, separately in terms of cost and overall length, of the proposed project is the replacement of 138 kV facilities installed as part of the 2014 project and what percentage is the replacement of aging infrastructure.

Because the new facilities to be installed would follow a different route, and are not a one-for-one replacement of existing facilities, none of the project’s costs or lengths are directly or solely attributable to either replacement of aging infrastructure or replacement of 138 kV facilities installed as part of the 2014 project.

By way of further information, please see below chart showing a breakdown of the length of overhead 138 kV facilities to be removed or installed as part of the proposed project.

<u>Circuit</u>	<u>Year of Modification</u>	<u>Structures</u>	<u>Overhead Transmission Line Length</u>
Removal of Existing Overhead Transmission Lines with Aging Infrastructure	2018	Str 4065-1 to Str 6842	2839 ft.
Removal of Overhead Lines from 2014	2018	Str 4063-1 to Str 4065-1	2407 ft.
Total Length of Overhead Removal	2018	Str 4063-1 to Str 6842	5246 ft.
Proposed River Crossing	2018	Str 6843 to Str 6845	4455 ft.

Additionally, please see the below table showing the proposed 138 kV facilities’ estimated cost, broken down by location.

138kV Facilities – North Side of Ohio River	\$2.13M
138kV Facilities – Ohio River Crossing and Interconnection at South Bank	\$3.04M
Total 138kV Costs	\$5.17M

**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).

  
\_\_\_\_\_

Dated: July 16, 2018