



Emily M. Farah
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August 31, 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, 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
Docket No. A-2018-3002896**

Dear Secretary Chiavetta,

Enclosed please find a copy of Duquesne Light Company's responses to the Data Requests of the Bureau of Technical Utility Services, Nos. 23 through 26. 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
Certificate of Service

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 Data Request Responses upon the participants listed below in accordance with the requirements of 52 Pa. Code § 57.74(b) (relating to service of copies):

VIA FIRST CLASS MAIL

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

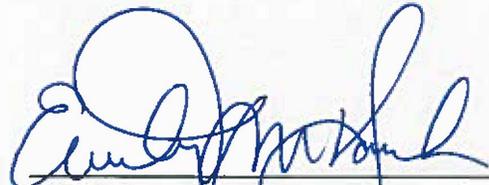
Tanya J. McCloskey ~ Acting Consumer Advocate
Pennsylvania Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923

Jennifer Lynn Rubolino
2092 Forest Grove Road
Coraopolis, PA 15108

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

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



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Counsel for Duquesne Light Company

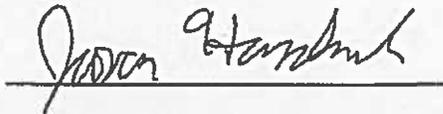
Date: August 31, 2018

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:

VERIFICATION

I, Jason Harchick, being the GENERAL MANAGER OF SYSTEM PLANNING, PROTECTION, AND COMPLIANCE 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).



Jason Harchick, P.E.
General Manager, System Planning, Protection, and Compliance

Date: 8/31/2018

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

Docket Nos.: A-2018-3002896
A-2018-3003113
A-2018-3003125

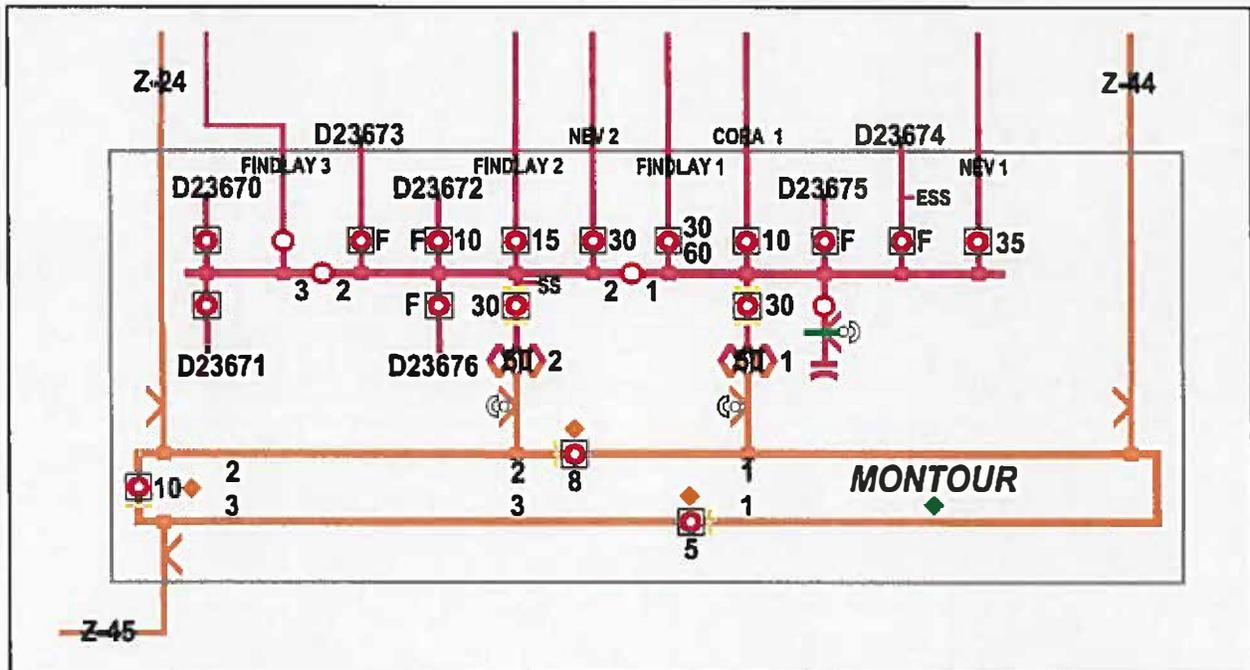
Witness: Jason Harchick

Set A-23

A-23 Reference TUS Data Requests, Response to A-9. Please provide an updated copy of the diagram with a legend.

Response:

A Map Legend has been provided on the following page.

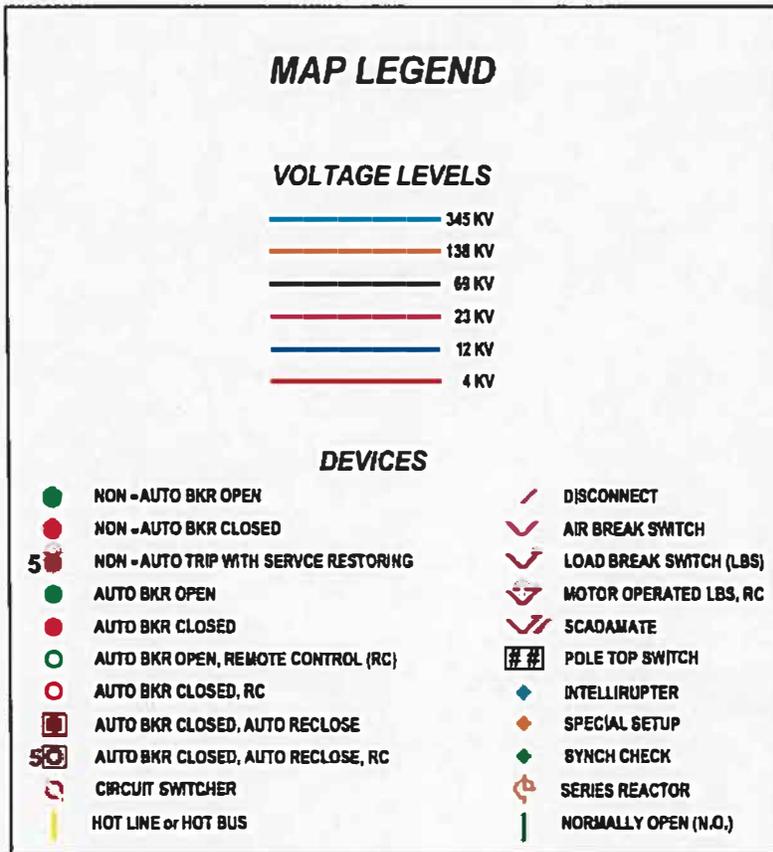


**Bureau of Technical Utility Services
Data Requests to Duquesne Light Company**

Docket Nos.: A-2018-3002896
A-2018-3003113
A-2018-3003125

Witness: Jason Harchick

Set A-23



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

Docket Nos.: A-2018-3002896
A-2018-3003113
A-2018-3003125

Witness: Jason Harchick

Set A-24

A-24 Reference TUS Data Requests, Response to A-15. Please provide a detailed description of the physical condition of transmission facilities to be replaced as part of Duquesne Light's aging infrastructure replacement.

Response:

The majority of the transmission substation equipment, including breakers, disconnect switches, bus work, and relays, to be replaced through this project were manufactured between the 1950s and the 1970s. Two of the 138 kV oil circuit breakers were manufactured in 1991. These equipment types typically have an expected lifespan of approximately 30 to 40 years. This equipment has either reached or is approaching the end of its useful life.

The transmission structures to be replaced are made of steel lattice and steel direct embedment design. The single steel lattice tower which was included in the LON to be replaced was installed in the 1950s and has reached the end of its useful life and is beyond repair. Additionally, the four (4) weathering steel direct embedment poles were installed in the 1990s.

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

Docket Nos.: A-2018-3002896
A-2018-3003113
A-2018-3003125

Witness: Lesley Gannon

Set A-25

A-25 Reference TUS Data Requests, Response to A-22. Please explain how the dollar amount was determined to compensate the property owners for related incidental expenses.

Response:

Please refer to Duquesne Light's response to A-26.

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

Docket Nos.: A-2018-3002896
A-2018-3003113
A-2018-3003125

Witness: Lesley Gannon

A-26 Reference TUS Data Requests, Response to A-22. Please provide an itemized breakdown of the related incidental expenses and their associated costs.

Response:

The Company did not receive an itemized list of expenses from the sellers. The Company provided an amount based on its knowledge that 1) the sellers were residing in the properties, 2) the properties were not for sale or encumbered by mortgage or lien, 3) the properties were not condemnable, 4) the sellers would be required to vacate the properties and secure alternative housing, and 5) the sellers had obtained an attorney and an appraisal, which likely involved certain expenses. The Company believes that purchase price was appropriate in that it also mitigated the Company's legal expenses by allowing us to reach a resolution with the sellers and acquire the properties necessary to safely complete the construction.