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September 24, 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. 30 and 31. 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 a printed name. The signature is fluid and cursive.

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

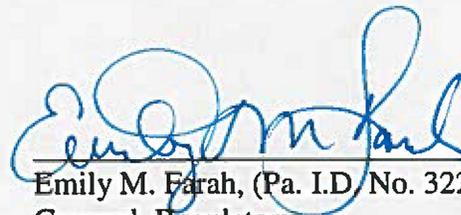
Tanya J. McCloskey – Acting Consumer Advocate
Pennsylvania Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923

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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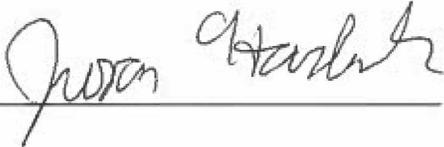
Date: September 24, 2018

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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: 9/24/2018

**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-30

A-30 Reference the Letter of Notification, Section III(C). Please explain why the described scenario is now an issue where it previously was not.

Response:

Montour Substation was constructed in the 1950s and therefore used design standards commensurate with that time period. Substation design standards since that time have evolved such that the present configuration of the Montour Substation is no longer in accordance with best utility practices. Reference PJM Transmission Owner Guidelines, Section III: *Substation Bus Configurations & Substation Design Recommendations* developed by the PJM Transmission and Substation Subcommittee (TSS) (Reference 1 below) and PJM Designated Entity Design Standards Task Force (DEDSTF) Minimum Required Standards (Reference 2 below). The PJM TSS serves as a technical advisory committee regarding the design, installation and maintenance of all PJM bulk power facilities. Although the proposed project is not required to meet the DEDSTF criteria as it was not competitively solicited, it is considered best utility practice to adhere to these criteria for all construction.

Reference 1, Page 5, Section 4.0, Item 2

Two circuits that feed a common location should not be supplied from a common breaker and a half bay or a common bus such that a single stuck breaker operation would trip both circuits.

Reference 2, Page 26, Section 4.2, Item 2

The arrangement of circuits and breaker bays shall be considered such that a stuck breaker operation will not trip two circuits on the same double circuit tower line.

Reference 2, Page 27, Section 4.3

The failure or maintenance outage of an element cannot remove another transmission line from service for any time increment.

As the Montour Substation equipment has reached or is approaching the end of its useful life, DLC considers that now is the appropriate time to perform the upgrades as identified in the Letter of Notification. Not performing this project risks equipment failure that could lead to outages to customers.

**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-30

Reference 1:

PJM Transmission Owner Guidelines, Section III: *Substation Bus Configurations & Substation Design Recommendations*

<https://www.pjm.com/-/media/planning/design-engineering/maac-standards/section-iii-sub-bus-config.ashx?la=en>

Reference 2:

PJM Designated Entity Design Standards Task Force Minimum Required Standards

<https://pjm.com/-/media/committees-groups/subcommittees/dedss/postings/20170626-designated-entity-design-standards-task-force-document.ashx?la=en>
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**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-31

A-31 Reference the Letter of Notification, Section III(C). Explain whether load growth in the area has led to any change in circumstances as it relates to the need for the proposed project. If so, quantify these load growth impacts.

Response:

There has been approximately 1.4% of annual load growth over the past 5 years in the area of the Montour Substation; therefore, load growth is not a major driver in the need for the proposed project. However, the changes proposed as part of this project will further position DLC to reliably serve the customers in the area. The primary drivers are those discussed in Section III(C) of the Letter of Notification.