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February 11, 2018

Via Electronic Filing and First Class Mail

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

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FEB 12 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**Re: Letter of Notification of Duquesne Light Company for Approval to Construct New
138 kV Transmission Lines in Beaver County, Pennsylvania.
Docket No. A-2019-3007090**

Dear Secretary Chiavetta:

Enclosed please find Duquesne Light Company's responses to Data Requests Propounded by the Bureau of Technical Utility Services ("TUS") Set I, A-1 through A-6, and A-9 through A-17.

Please note that CONFIDENTIAL A-5 Attachment contains material that may constitute Confidential Security Information (CSI) because it displays, in a high degree of detail, an aerial image of electric transmission infrastructure. Pursuant to 52 Pa. Code 102.3(b), the Company is submitting CONFIDENTIAL A-5 Attachment in a separate envelope, and respectfully requests that the Commission exclude CONFIDENTIAL A-5 Attachment from the public file.

Sincerely,

/s/ Michael Zimmerman

Michael Zimmerman

Enclosures

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

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SECRETARY'S BUREAU

Bureau of Technical Utility Services
Data Requests
Docket No. A-2019-3007090

Note: If any responses contain Confidential Security Information (CSI), please inform TUS staff via phone call or email.

A-1 Reference the Letter of Notification, Section I. Please provide a detailed description of the electrical reliability needs of NOVA Chemical and explain whether the existing 69 kV Kobuta Tap meets those needs.

Response:

NOVA Chemical has represented to Duquesne Light that it uses and manufactures hazardous chemicals at its Beaver Valley facility, and that it requires two redundant power sources to operate that facility on a safe and stable basis. The existing 69 kV Kobuta Tap is capable of serving the full electric load at the facility.

A-2 Reference the Letter of Notification, Section I. Please explain whether Duquesne Light would replace the 69 kV Kubota Tap if it wasn't needed to meet the reliability needs of NOVA Chemical, Inc.

Response:

No, Duquesne Light would not replace the 69 kV Kubota Tap if not for the request of NOVA Chemical for two redundant power sources.

A-3 Reference the Letter of Notification, Section I. Please state whether NOVA Chemical, Inc. requested that Duquesne Light replace the 69 kV Kubota Tap with a 138 kV source.

Response:

NOVA requested that Duquesne Light maintain two redundant services. NOVA and Duquesne Light developed the approach reflected in the Letter of Notification – i.e., replacing the 69 kV Kubota Tap with a new 138 kV source while also continuing to maintain the Existing 138 kV Service – as a potential way to deliver two redundant services while also retiring the 69 kV Kubota Tap infrastructure.

A-4 Reference the Letter of Notification, Paragraph 5. Attachment 2 does not appear to be included in the filing. Please provide a copy of the referenced attachment.

Response:

Please refer to the CONFIDENTIAL copy of the Letter of Notification, filed January 11, 2019.

A-5 Reference the Letter of Notification, Paragraph 5. Please provide an aerial map depicting property parcels to be crossed and existing transmission facilities, proposed facilities, and new and existing right-of-way.

Response:

Please see the CONFIDENTIAL A-5 Attachment. Please note that CONFIDENTIAL A-5 Attachment may contain Confidential Security Information (CSI), and is marked accordingly.

A-6 Reference the Letter of Notification, Paragraph 10. Please provide a cost benefit analysis for replacing the infrastructure versus continued maintenance.

Response:

The Company did not perform a cost benefit analysis for replacing the infrastructure versus continued maintenance. The Company's inspections of the H-frame structures supporting the 69 kV Kubota Tap indicated that one-third of those structures have degraded beyond the point of continued maintenance, and as such should be retired. These structures constitute a significant proportion of the 69 kV Kubota Tap infrastructure. Because continued maintenance is not a viable option for keeping these structures in service, the Company did not perform a cost benefit analysis thereof.

A-9 Reference the Letter of Notification, Paragraph 13. Please quantify the anticipated increase in reliability.

Response:

Under the present configuration, NOVA Chemical's procedure to transfer between sources is to turn off the primary electrical supply which results in a short electrical outage to their entire facility. The need to transfer could be for an unplanned outage to one of the sources or for planned maintenance activities. Two 138 kV sources will allow NOVA Chemical to transfer between the electrical sources without experiencing a facility outage. The Company does not have an estimate of the quantifiable reliability impacts (e.g., in total outage duration, outaged kVa-hours, etc.) of this configuration change.

A-10 Reference the Letter of Notification, Paragraph 14. Please state the approximate duration of the plant outage and explain what duration is acceptable to meet NOVA Chemical, Inc.'s reliability requirements.

Response:

Under the present configuration, NOVA Chemical's procedure to transfer between sources is to turn off the primary electrical supply (the Existing 138 kV Service), which results in a

short electrical outage to their entire facility. It is Duquesne Light's understanding that this process take approximately 15-30 minutes.

- A-11 Reference the Letter of Notification, Paragraph 14. Please explain how the use of a second 138 kV source will allow NOVA Chemical, Inc. to eliminate the key interlock scheme.

Response:

Presently, NOVA Chemical Inc. is fed by two (2) sources: the Existing 138 kV Service and the 69 kV Kubota Tap. The key interlock scheme was implemented to prevent the paralleling of these two different voltage sources and possibly causing a transient disturbance which could result in an unplanned interruption.

As such, the Existing 138 kV Service serves as the primary source of power, and is normally in-service, while the 69 kV Kubota Tap serves as the backup source of power and the breaker which accepts the 69 kV Kubota Tap is normally open. Replacing the 69 kV Kubota Tap with a new 138 kV circuit would eliminate the possibility of a transient disturbance occurring due to the difference in voltages and therefore allow the two sources to simultaneously feed NOVA Chemical Inc.

- A-12 Reference the Letter of Notification, Paragraph 15. Please state the number of customers served by the Kobuta Tap and explain whether any of the loads are considered to be critical customers.

Response:

NOVA Chemical is the only customer served by the 69 kV Kubota Tap. NOVA's facility is considered to be a critical customer.

- A-13 Reference the Letter of Notification, Section III (B). Please explain whether alternative solutions were considered. If so, provide a brief description of the alternative(s) and provide a detailed explanation of why the chosen solution was selected.

Response:

Duquesne Light considered the following alternatives:

Loop in Existing 138 kV Circuit

Duquesne Light considered rerouting the nearby Raccoon-Potter (Z-83) 138 kV circuit to connect into the NOVA Chemical facility on a common tower line. While this would have provided NOVA Chemical with two alternate sources of power, this alternative was less desirable than the chosen approach, as a planned or unplanned outage to the common tower line would interrupt both sources of electrical service.

Construct New 138 kV Circuit on Completely Separate Right-of-Way

Duquesne Light also considered constructing an entirely new 138 kV circuit to NOVA

Chemical Inc. on completely separate right-of-way. This alternative would not be as cost-effective as the chosen approach and would pose increased constructability issues. Also, acquiring additional right-of-way would have the potential to impact a greater number of property owners.

A-14 Reference the Letter of Notification, Paragraph 20. Please explain whether any new transmission line structures will be placed on parcels that did not previously have a transmission structure.

Response:

No new structures will be placed on parcels that did not previously have a transmission structure.

A-15 Reference the Letter of Notification, Paragraph 20. Please explain whether the existing steel monopoles will be used for the new 138 kV line.

Response:

No existing structures will be used for the proposed new 138 kV line. This new 138 kV line would be on all new steel monopole structures.

A-16 Reference the Letter of Notification, Paragraph 22. Please provide the names and addresses of the property owners whose land the right-of-way for the new 138 kV transmission tap will cross and ensure that the certificate of service includes these individuals/entities.

Response:

All but one of the parcels crossed by the new 138 kV transmission line are owned by one of three property owners, each of which is identified on the original Certificate of Service filed along with the Letter of Notification. These property owners, and their respective mailing addresses, are as follows:

NOVA Chemicals
400 Frankfort Road
Monaca, PA 15061

Shell Chemical Appalachian, LLC
P.O. Box 4369
Houston, TX 77210

Le Petomane XXIII, Inc.
Custodial Trustee
35 East Walker Drive, Suite 1550
Chicago, IL 60601

In preparing its responses to this set of data requests, the Company also identified a narrow parcel owned by BASF Corporation that would be crossed by the new 138 kV transmission line. Please see CONFIDENTIAL A-5 Attachment (where the new 138 kV transmission line crosses Raccoon Creek). Approximately 66 feet of new 138 kV transmission line would cross this BASF-owned parcel.

The Company is sending the notice required under 52 Pa. Code § 57.91 to BASF, and after the applicable period of time, intends to negotiate the acquisition of requisite real property rights for the new 138 kV transmission line. The Company will also prepare and file a revised Certificate of Service that includes BASF, and will serve BASF with a copy of the Letter of Notification.

BASF's mailing address is:

BASF Corporation
100 Park Avenue
Florham Park, NJ 07932

A-17 Reference the Letter of Notification, Section F. Please provide a revised section which includes the statement required by 52 Pa. Code § 57.72(d)(4)(iv).

Response:

Please see A-17 Attachment, which inserts a new Paragraph 41 containing this statement.

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Letter of Notification of Duquesne Light	:	
Company, Filed Pursuant to 52 Pa. Code	:	Docket No. A-2019-3007090
Chapter 57 Subchapter G, for Approval to	:	
Install a new 138 kV line to support the NOVA	:	
Chemical Plant located in Potter Township,	:	
Beaver County, PA.	:	

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

LETTER OF NOTIFICATION OF DUQUESNE LIGHT COMPANY

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

I. INTRODUCTION

Pursuant to 52 Pa. Code § 57.72(d)(1)(vi), Duquesne Light Company ("Duquesne Light" or "Company"), files this Letter of Notification requesting approval from the Pennsylvania Public Utility Commission ("Commission") for the 138 kV ("kilovolt") circuit, approximately 1.21 miles in length and extending from the Potter Substation to the NOVA Chemical Substation, to replace the existing 69 kV Kobuta Tap supplying NOVA Chemicals, Inc. ("NOVA") plant in Potter Township, Monaca Borough, Pennsylvania (hereafter the "Project"). The purpose of the Project is to (1) replace aged 69 kV infrastructure with 138 kV infrastructure that conforms to the Company's current design standards; and (2) meet the reliability needs of NOVA. The Project is planned through coordination with NOVA. NOVA will be responsible for the new substation interconnections.

This Project is located in Potter Township in Beaver County. Duquesne Light has provided information regarding this Project to the impacted municipality. Construction on

the Project is scheduled to begin in June 2019 and completed by November 15, 2019, to support the construction schedule associated with NOVA Chemical's facility upgrades.

In support of its request for approval, Duquesne Light states as follows:

II. BACKGROUND

1. Duquesne Light is a public utility as the term is defined under Section 102 of the Public Utility Code, 66 Pa.C.S. § 102, and is certificated by the Commission to provide electric distribution service in portions of Allegheny County and Beaver County in Pennsylvania. Duquesne Light is also an electric distribution company ("EDC") and a default service provider as those terms are defined under Section 2803 of the Public Utility Code. 66 Pa.C.S. § 2803.

2. Duquesne Light owns approximately 670 miles of transmission lines operating at 69 kV, 138 kV, and 345 kV, and approximately 7,200 miles of distribution lines operating at less than 69 kV. Duquesne Light's transmission facilities are presently operated subject to the functional control of PJM Interconnection LLC. ("PJM").

3. Duquesne Light's business address is as follows:

Duquesne Light Company
411 Seventh Avenue
Pittsburgh, PA 15219

4. Duquesne Light's attorney in this matter is:

Michael Zimmerman (Pa. I.D. No. 323715)
Counsel, Regulatory
Duquesne Light Company
411 Seventh Avenue, 15th Fl..
Pittsburgh, PA 15219
Phone: 412-393-6268
Fax: 412-393-5757
E-mail: mzimmerman@duqlight.com

A-17 Attachment

Duquesne Light's attorney is authorized to electronically receive all notices and communications regarding this filing. Further, counsel for Duquesne Light consents to the service of documents by electronic mail at the above e-mail address, pursuant to 52 Pa. Code § 1.54(b)(3).

5. This Letter of Notification includes the following accompanying attachments:

- Attachment 1 – United States Geological Survey (USGS) Maps with Existing and Proposed Circuit Configuration
- Attachment 2 – CONFIDENTIAL Aerial Map of Existing and Proposed Facilities
- Attachment 3 – Typical Cross Section of Proposed 138 kV Facilities
- Attachment 4 – Design Criteria and Safety Practices

6. CONFIDENTIAL Attachment 2 shows critical energy infrastructure information regarding the bulk transmission system of Duquesne Light located within its certificated service territory in Pennsylvania. Duquesne Light is therefore submitting a CONFIDENTIAL version of Attachment 2.

7. This Letter of Notification and accompanying Attachments, which are incorporated herein by reference, contain all the information required by 52 Pa. Code §57.72(d)(4).

III. GENERAL DESCRIPTION OF THE PROJECT

A. NEED FOR THE PROJECT

8. The proposed project is required to replace the Kobuta Tap, an aged 69 kV circuit that connects the Valley-Hopewell (66141) 69 kV transmission line to the NOVA facility, with a transmission facility that meets Duquesne Light's present 138 kV standards.

9. The Kobuta Tap consists of 1.86 miles of 69 kV conductor supported by 13 wood H-

A-17 Attachment

frame structures ranging from 50 to 80 feet in height and 3 steel monopoles ranging in from 90 to 180 feet in height. It is located in Potter Township, Pennsylvania, and extends roughly west-northwest from the NOVA facility to the Valley-Hopewell 69 kV transmission line. Whereas the Valley-Hopewell 69 kV transmission line is built to 138 kV standards, most of the Kobuta Tap is built to 69 kV standards.

10. The Kobuta Tap was constructed in the 1940's and has reached the end of its service life. The normal life expectancy of a wood pole, including those comprising the Kobuta Tap's H-frame structures, is 40-60 years. The Kobuta Tap is over 70 years old. Furthermore, Company testing of the Kobuta Tap's H-frame structures conducted in October 2018 indicates that one-third of the structures should be retired within one year.

11. The Kobuta Tap has experienced four (4) unplanned outages over the past five (5) years. Each of these outages resulted from events affecting the Valley-Hopewell 69 kV transmission line to which the Kobuta Tap connects.

12. Retiring the existing Kobuta Tap 69 kV facilities also contributes to Duquesne Light's ongoing phase-out of its 69 kV facilities. Duquesne Light no longer has 69 kV construction standards for new construction,¹ and has reduced its 69 kV facilities to 19.2 miles of 69 kV lines that serve only three general service customers. The Company intends to retire all remaining 69 kV facilities, including the facilities to be removed as part of the Project, as those facilities reach the end of their service lives.

13. The proposed project would also provide increased reliability and operability to NOVA.

¹ See, e.g., Supplement No. 188 to Duquesne Light Company Tariff – Electric, PA P.U.C. No. 24, at Rule 3 (filed December 21, 2018, at Docket Nos. R-2018-3000124 *et al.*) (updating the Company's Tariff to eliminate 69 kV as a standard service voltage available to new customers).

A-17 Attachment

14. NOVA is presently served by two transmission sources, Potter-AES (Z-80) 138 kV transmission line and the Kobuta Tap. Presently, the customer's key interlock scheme requires that one source opens prior to transfer to the other source resulting in a short plant outage.

15. According to NOVA, NOVA requires a high level of electric service reliability due to the critical nature of the operations at its facility. The Project would provide a second 138 kV source for NOVA. NOVA will build a new 138 kV customer substation to accept service from the new Potter-NOVA Chemical (Z-180) 138 kV transmission line. The second 138 kV electrical source to this customer will allow the customer to eliminate the key interlock scheme and permit the customer to be supplied by either transmission source without a plant outage.

16. This project was presented to PJM stakeholders on August 31, 2018, and included in PJM's Regional Transmission Expansion Plan ("RTEP") as project s1738.

B. DESCRIPTION OF THE PROJECT

17. The NOVA Chemical 138 kV Project, as discussed herein, involves installation of a new 138 kV circuit to replace the Kobuta Tap. This work is located in Potter Township, Beaver County, PA.

18. The new 138 kV line will include installation of approximately 1.21 miles of new single circuit transmission structures with 853.7 kcmil² aluminum conductor alloy reinforced ("ACAR") 24/13 conductor between the Duquesne Light's Potter Substation and the new NOVA Chemical Substation. The summer continuous thermal rating of this conductor will be 932 Amperes. Included in the new installation is one optical groundwire ("OPGW") shield

² Wire sizes are expressed in thousands of circular mils (kcmil). A circular mil is the cross-sectional area of a wire one mil in diameter, where 1 kcmil = 0.5067 mmi.

wire.

19. The minimum vertical conductor clearance to ground of the new 138 kV line will be 36 feet.

20. The new 138 kV line will be supported with 13 single steel monopole structures installed on concrete pier foundations approximately 7 ½ feet in diameter. The structures will range in height from 100-135 feet above ground.

21. Where possible, the proposed 138 kV line will be constructed adjacent to the existing Kobuta Tap. Approximately 2,650 linear feet of the proposed 138 kV line will be constructed adjacent to the Kobuta Tap. Approximately 3,507 linear feet of the proposed 138 kV line will not be constructed immediately adjacent to the existing Kobuta Tap.

22. The majority of the right-of-way will be 100 feet in width. For the portion of the proposed 138 kV line adjacent to the Kobuta Tap right-of-way, additional right-of-way approximately 50 feet in width will be required. For those portions of the Project not immediately adjacent to the existing Kobuta Tap right-of-way, new rights-of-way approximately 100 feet in width will be required. The Company has obtained all required easements and right-of-way from property owners.

23. The Kobuta Tap will remain in-service during construction in order to continue to provide a backup feed to NOVA during construction. After the new 138 kV line is placed into service, the Kobuta Tap will be retired and removed.

24. The estimated cost of the Project is \$5.95 million, to be borne by the Company.

25. Subject to Commission approval, construction of the Project is scheduled to begin June 1, 2019, and conclude by November 15, 2019.

C. HEALTH AND SAFETY

26. The Project will not create any unreasonable risk of danger to public health or safety.

27. The Project will be designed, constructed, operated, and maintained in a manner that meets or surpasses all applicable National Electric Safety Code (“NESC”) minimum standards. The Project will also conform to Duquesne Light's design criteria, construction standards, and safety practices. See Attachment 4 – Duquesne Light’s Design Criteria and Safety Practices.

28. The Project is not expected to have any impact on pipelines, other utilities, or telecommunications.

29. There are no airports or landing strips within two (2) miles of the Project right-of-way. The nearest airport or landing strip, Sainovich Airport, is located approximately 5.1 miles from the Project area. There are no expected impacts to any airport based on the distance, presence of the existing transmission facilities, and the proposed height of the new 138 kV structures.

D. DESCRIPTION OF RIGHT-OF-WAY

30. Duquesne Light’s vegetation management practices are based on maintenance rights acquired, voltage of the line involved, proximity of trees to the facilities, and the species and condition of trees involved. Attachment 2 – CONFIDENTIAL Project Area Map details the observed habitat and land use types within the Project area.

31. There are no state lands, national parks, state parks, or local parks within the Project area. The Project will not affect any recreational areas or natural landmarks. The Project is proposing an aerial crossing over a parcel owned by an environmental custodial trust, Le Petomane XXIII Inc. The existing Kobuta Tap currently has an aerial crossing over this

same property. This new proposed aerial crossing will replace the existing crossing, resulting in only one total crossing over a parcel owned by an environmental custodial trust. The Project will not traverse or affect any unique geological, scenic, or natural areas.

32. Duquesne Light will review the Project with the Pennsylvania Historical and Museum Commission (“PHMC”) to determine whether the project will have any impacts to cultural and archaeological resources. Duquesne Light will coordinate with and comply with any surveys or conditions required by the PHMC.

33. A waters of the U.S. delineation was completed for the Project area that identified two regulated features – Raccoon Creek and a regulated linear wetland. Raccoon Creek, a navigable waterway, is currently crossed by the Kobuta Tap and will be aurally crossed by the new 138 kV line. The regulated linear wetland is currently crossed by the existing Kobuta Tap but will not be crossed by the new 138 kV line. Please see Attachment 2 for more information. Duquesne Light will obtain all necessary environmental permits. Duquesne Light will comply with all the terms and conditions placed on those permits.

34. Duquesne Light will acquire any required erosion and sediment (“E&S”) control approvals and will comply with any conditions placed on those approvals. Duquesne Light will also develop an Erosion and Sedimentation Control Plan (“ESCP”) that is compliant with state regulations. A Post Construction Stormwater Management/Site Restoration (“PCSM”) Plan will be prepared if required.

E. NOTICE

35. Duquesne Light has provided information regarding the Project to representatives of Potter Township in Beaver County.

36. Copies of this Letter of Notification will be served on the governmental agencies,

municipalities, and other public entities agencies in accordance with 52 Pa. Code § 57.72(d)(3).

37. All landowners potentially impacted by the construction of the new transmission line and subsequent removal of the Kobuta Tap will receive a copy of this filing. Damages, if any, would be restored.

38. Duquesne Light has completed a desktop review of Pennsylvania Natural Heritage Program (“PNHP”) Core Habitat data for the Project area as part of the waters of the U.S. delineation study. Based on the review of this data, the Project area is crossed by the Lower Raccoon Creek Biological Diversity Area (“BDA”). As part of the permit requirements for the Project, Duquesne Light will obtain a Pennsylvania Natural Diversity Inventory (“PNDI”) receipt that will address habitat under the jurisdiction of the Pennsylvania Department of Conservation and Natural Resources (“DCNR”), the Pennsylvania Fish and Boat Commission (“PFBC”), the Pennsylvania Game Commission (“PGC”), and the U.S. Fish and Wildlife Service (“USFWS”). Based on the results of the PNDI review, Duquesne Light will undertake regulatory consultation with any of the above-listed agencies, as required.

F. LETTER OF NOTIFICATION

39. Duquesne Light is proceeding by means of a Letter of Notification, instead of a full transmission siting Application, pursuant to the Commission’s regulations at 52 Pa. Code § 57.72(d)(1)(vi).

40. The transmission line work associated with this Project qualifies for use of a Letter of Notification because the entire Project will be less than two (2) miles in length.

41. This Letter of Notification was initially filed on January 11, 2019. Pursuant to 52 Pa.

A-17 Attachment

Code § 57.72(d)(5), if the Commission approves this Letter of Notification without material modification, the new transmission line shall be located and constructed without the application process set forth in Title 52, Chapter 75, Subchapter G of the Commission's regulations. If the Commission does not approve the Letter of Notification, its order shall direct Duquesne Light to comply with the application process set forth in Title 52, Chapter 75, Subchapter G of the Commission's regulations.

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Letter of Notification of Duquesne Light :
Company, Filed Pursuant to 52 Pa. Code : Docket No. A-2019-3007090
Chapter 57 Subchapter G, for Approval to :
Install a new 138kV line to support the NOVA :
Chemical Plant located in Monaca, PA in :
Beaver County, PA. :

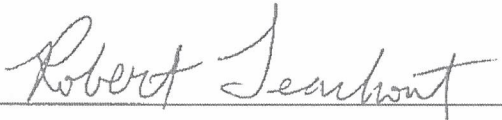
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VERIFICATION

I, Robert Teachout, 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: February 8, 2019

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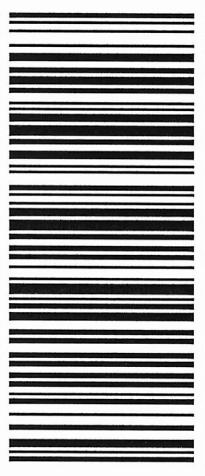
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400 NORTH STREET, 2ND FLOOR
COMMONWEALTH KEYSTONE BUILDING
HARRISBURG PA 17120-0093



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