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April 24, 2019

Via First Class Mail

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

**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 response to Data Requests Propounded
by the Bureau of Technical Utility Services ("TUS") Set III, A-21 to 22.

Sincerely,

Michael Zimmerman

Enclosures

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

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

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

- A-21 Reference TUS Data Requests, Response to A-13. Please provide the approximate cost of the two alternative solutions.

Response:

The first alternative was to loop the existing Potter-Raccoon (Z-83) 138 kV transmission circuit into the new NOVA Chemical customer substation. Since the Potter-Raccoon (Z-83) 138 kV transmission circuit crosses over the existing Valley-Hopewell 66141 Kobuta tap 69 kV transmission line, this new looped line would be built either on or adjacent to the existing Valley-Hopewell (66141) Kobuta tap 69 kV transmission line right of way. To prevent a single point of failure from taking out both circuits to this customer during a planned or unplanned outage, the two circuits would be built parallel and on independent structures instead of a single common structure. The approximate cost would be \$8.75M.

The second alternative was to build a new Potter-NOVA 138 kV transmission line on completely new right of way. Assuming that the transmission line lengths and structure/foundation design would be similar, the materials and construction costs of this alternative solution would be comparable to the proposed transmission line. However, the transmission line would be in all new private right of way, which would increase the total cost of this alternative.

Additionally, the Company had concerns about the constructability and accessibility for this alternative. If the new transmission line were constructed on private property on the southeast side of State Route 18, some of the structures would be located on an extremely steep slope resulting in accessibility issues for both construction and maintenance. (This would also increase the cost of the alternative relative to the proposed project.) Furthermore, on the northwest side of State Route 18, railroad tracks, a chemical company, and an environmental land trust pose potential constructability/accessibility challenges. Based on preliminary siting analysis, DLC did not believe that siting a transmission line in this area would be feasible.

- A-22 Reference TUS Data Requests, Response to A-19. Please explain how Duquesne Light paying for the subject project is consistent with the referenced tariff language.

Response:

The NOVA LON represents a unique circumstance wherein the existing redundant service lines were not paid for by Duquesne Light or the current customer. Additionally, as discussed in LON paragraphs 8-12 and the Company's response to TUS Data Request A-6, the existing 69kV service line must be retired. As a compromise based on the circumstances

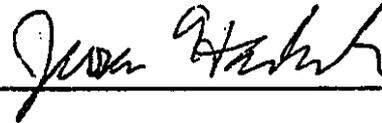
presented in this single instance, the parties agreed that – subject to Commission approval – the Company would construct a new redundant 138kV service, while NOVA would be responsible for any future replacement and maintenance costs associated with the redundant service.

**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. :

VERIFICATION

I, Jason Harchick, 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: April 24, 2019

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