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July 3, 2019

**Via E-Mail and First Class Mail**

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

**Re: Municipal Agreement between Duquesne Light Company and the Municipality of  
Monroeville, Allegheny County, Pennsylvania  
Docket No. U-2019-3009738**

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, in the above-captioned matter.

Sincerely,

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. U-2019-3009738

TUS-1 Reference the Agreement, First Page, Last Paragraph. Please state the size of the easement, in acres, Duquesne Light will obtain from Monroeville.

**Response:**

Approximately 1.1 acres.

TUS-2 Reference the Cover Letter, Second Paragraph. Please confirm the estimated value of the consideration for the easement.

**Response:**

Confirmed; the Company estimates the value of the consideration at \$13,000.

TUS-3 Reference the Agreement, Second page, Last paragraph. Please provide a detailed explanation of the methodology used to determine the value of the easement.

**Response:**

With respect to the estimated value of the consideration provided in exchange for the easement, the Company's estimate of \$13,000 reflects:

- \$125 per LED streetlight conversion, times 100 conversions: \$12,500
- Fence and gate installation: \$500
- Total: \$13,000

With respect to the estimated value of the easement itself: the Company contracted with Doyle Land Services ("Doyle") to prepare initial estimates of the fair market value of easements associated with the Universal-Plum transmission line project. Doyle performed a comparative analysis of properties in the area to derive a base easement price per acre for commercial properties. This base value was then adjusted for parcel-specific factors (ease of development, relative effect of transmission facilities on parcel developability, topography, etc.) to produce an estimate of fair market value for the easement. This analysis yielded an estimated easement value of approximately \$14,000.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Municipal Agreement between Duquesne Light  
Company and the Municipality of Monroeville,  
Allegheny County, Pennsylvania

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Docket No. U-2019-3009738

**VERIFICATION**

I, Jason Hartle, 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).

  
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Dated: July 1, 2019



Regulatory Department  
411 Seventh Avenue, 15-7  
Pittsburgh, PA 15219

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PA PUC  
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Harrisburg, PA 17120