

**PENNSYLVANIA PUBLIC UTILITY COMMISSION
HARRISBURG, PENNSYLVANIA 17105**

**Management and Operations Audit of
Duquesne Light Company**

**Public Meeting: August 8, 2019
3000838-AUD
Docket No. D-2018-3000838**

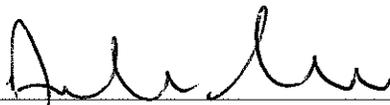
STATEMENT OF COMMISSIONER ANDREW G. PLACE

Before us is the Management and Operations Audit (Audit) of Duquesne Light Company (DLC or Company), and the Implementation Plan responding to each of the auditors' 18 recommendations. Our action today is to make the audit report and Implementation Plan public. In taking this action, I wish to emphasize my concerns regarding field operation craft worker overtime. Overtime levels have been broadly increasing since 2015, exceeding 40% (above straight time) for several functional groups and averaging 39.6% across field operations craft staff in 2018 (through November), while a relatively small, but growing, number of the field operations employees are exceeding 1,040 hours (50% above straight time) of overtime per year and have even reached above 2,080 overtime hours (more than a standard work year).¹ Conversely, historical overtime levels for craft workers at other EDCs typically range from 15% to 20%. Overtime levels that exceed this range often indicate a need to increase staffing and/or adjust the existing staffing levels to other shifts. Further, with the inclusion of the Long-Term Infrastructure Improvement Plan (LTIIP) projects, the audit concluded that DLC will need to hire craft workers or increase the use of contractors. Otherwise, high levels of overtime for DLC field operations overtime will continue and not be financially efficient.

However, my concerns, and those of the auditors, go beyond solely cost savings. As noted, given the hazardous nature of working with high voltage lines, excessive overtime for individual craft workers may well increase risk. Fatigue and reduced awareness can result in injuries to employees and/or customers and bring unnecessary damage to Company and customer property.

In the interest of the safety, electric service reliability, and cost burden of employees and customers, I strongly encourage DLC to aggressively address this manpower issue.

DATE: August 8, 2019



Andrew G. Place, Commissioner

¹ DLC Management and Operations Audit at 55.