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September 16, 2019

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Keystone Bldg. 2nd Floor W
400 N. Street
Harrisburg, PA 17120

**RE: Letter of Notification of Duquesne Light Company, Filed Pursuant to 52 Pa. Code Chapter 57 Subchapter G, for Approval to install a new 138 kV line and reconductor existing circuits to support the Southeast Capacity Project located in the Borough of Dravosburg, Borough of West Mifflin, Borough of Jefferson Hills, Union Township, and Forward Township in Allegheny and Washington Counties, Pennsylvania.
Docket Nos. A-2019-3009698 & P-2019-3010087**

Dear Secretary Chiavetta:

On Wednesday, September 11, 2019, the Bureau of Technical Utility Services ("TUS") propounded one Data Request (identified as Set III, A-9) upon Duquesne Light Company ("Duquesne Light" or the "Company") in connection with the Letter of Notification filed at Docket No. A-2019-3009698 ("Southeast Capacity Project LON"), which was been consolidated with the Company's Petition at Docket No. P-2019-3010087. Enclosed is Duquesne Light's response to Data Request Set III, A-9.

As explained in the enclosed response, PJM Interconnection, LLC ("PJM") is continuing its analysis for four of the thirteen PJM baseline projects identified in the initial Southeast Capacity Project LON. Duquesne Light is hereby requesting the four baseline projects "pending resolution," namely, b3061, b3062, b3063, and b3065, be removed from the Southeast Capacity Project LON until PJM completes its analysis.

A copy of this cover letter and the enclosed response have been served upon TUS staff by electronic mailing. Please contact me if you have any questions, comments, or concerns.

Respectfully,

A handwritten signature in blue ink, appearing to read "Emily M. Farah", is written over the typed name and title.

Emily M. Farah
Counsel, Regulatory
Duquesne Light Company

cc: Jeremy Haring (via email, w/ encl.)

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Witness: Jason Harchick

A-9 Reference the PJM PowerPoint released September 9, 2019, titled Generation Deactivation Notification Update, for the Transmission Expansion Advisory Committee (TEAC) meeting on September 12, 2019.

- A. Please explain if the need for the LON at Docket No. A-2019-3009698 has changed due to the information presented in the PowerPoint.
- B. Please explain with specificity how the removal of baseline projects b3061, b3062, b3063, and b3065 will impact the LON or any project segments at Docket No. A-2019-3009698 and the zoning petition filed at Docket No. P-2019-3010087.
- C. Please explain with specificity how each of the baseline projects b3061, b3062, b3063, and b3065 applies to the LON or any project segments at Docket No. A-2019-3009698 and the zoning petition filed at Docket No. P-2019-3010087.
- D. Please explain if any in-service dates of the LON project segments have changed due to information presented in the PowerPoint.

Response:

A)

Generally, the need for the Letter of Notification (“LON”) at Docket No. A-2019 3009698 has not changed. Certain FirstEnergy generator deactivations will cause reliability criteria violations, and Duquesne Light Company (“DLC” or “Duquesne Light”) is required to address those violations to maintain safe and reliable service to its customers. The thirteen PJM baseline identification numbers associated with the LON are: b3012.2, b3015.1, b3015.2, b3015.3, b3015.4, b3015.5, b3015.7, b3061, b3062, b3063, b3064, b3065, and b3084. PJM has not indicated that any of the thirteen baseline projects will be removed, but instead has indicated it will continue its analysis for four of the thirteen baseline projects. PJM’s analysis for baseline projects b3061, b3062, b3063, and b3065 will be completed in February 2020.

By way of further response, the PowerPoint presentation and PJM’s comments at the September 12, 2019 TEAC meeting confirmed that the following PJM baseline projects are still required to maintain reliability¹:

- b3012.2 (DLC) – Construct two new ties from a new FE substation to a new Duquesne substation by using a common structure

¹ <https://www.pjm.com/-/media/committees-groups/committees/teac/20190912/20190912-generation-deactivation-notification-update.ashx> , Slides 10-14

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- b3015.1 (DLC) - Construct new Elrama 138 kV substation and connect 7 138 kV lines to new substation.
- b3015.2 (DLC) - Reconductor Elrama to Wilson 138 kV line.
- b3015.3 (DLC) - Reconductor Dravosburg to West Mifflin 138 kV line.
- b3015.4 (DLC) - Run new conductor on existing tower to establish the new Dravosburg-Elrama (Z-75) circuit.
- b3015.5 (DLC) - Reconductor Elrama to Mitchell 138 kV line.
- b3015.7 (DLC) - Reconductor Wilson to West Mifflin 138 kV line.
- b3064 (DLC) - Expand Elrama 138 kV substation to loop in the existing USS Steel Clariton - Piney Fork 138 kV line.
- b3084 (DLC) - Reconductor the Oakland - Panther Hollow 138 kV line.²

The PowerPoint and PJM's comments at the September 12, 2019 TEAC meeting indicate that baseline projects b3061, b3062, b3063, and b3065 are "Pending Resolution," meaning that the baseline projects "...may be required upon completion of baseline re-tools or may be relied on by applicable queue projects."³ Until PJM's analysis is completed, PJM directed all Transmission Owners, including Duquesne Light, to pause work associated with these projects until PJM completes the analysis of the AE2 System Impact Study in February 2020.⁴

The information presented in the PowerPoint alone does not change the need for or change any of the in-service dates of the LON or any project segments. DLC has not received a construction responsibility letter from PJM reflecting a change in the need or the original June 1, 2021 required in-service date for baseline projects b3061, b3062, b3063, and b3065.

Subject to Commission approval, construction of PJM baseline projects b3012.2, b3015.1, b3015.2, b3015.3, b3015.4, b3015.5, b3015.7, and b3064 is scheduled to begin September 2019 and conclude by May 2021 in order to meet the PJM required in-service date.

B)

Project b3061

If PJM provides notification of DLC's construction responsibility to no longer construct PJM baseline project b3061 in accordance with PJM's Open Access Transmission Tariff ("OATT"), approximately 3.0 miles of the Dravosburg-West Mifflin (Z-73) 138kV circuit would no longer need to be reconducted with bundled 795 kcmil⁵ 20/7 ACSS-TW-HS⁶ conductor. However,

² The scope of b3084 is to reconductor the underground Oakland-Panther Hollow 138kV circuit and is not related to Docket No. A-2019-3009698 or the zoning petition filed at Docket No. P-2019-3010087

³ <https://www.pjm.com/-/media/committees-groups/committees/teac/20190912/20190912-generation-deactivation-notification-update.ashx> , Slide 7

⁴ <https://www.pjm.com/-/media/committees-groups/committees/teac/20190912/20190912-generation-deactivation-notification-update.ashx> , Slide 7

⁵ Kcmil stands for thousand circular mils. Kcmil wire size is the equivalent cross sectional area in thousands of circular mils. A circular mil is the area of a circle with a diameter of one thousandth (0.001) of an inch.

⁶ ACSS-TW-HS stands for aluminum conductor steel supported, trapezoidal-shaped aluminum strands, high strength conductors

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this circuit would still be required to be reconducted with single 795 kcmil 20/7 ACSS-TW-HS conductor⁷.

Additionally, approximately 3.0 miles of the new Dravosburg-Elrama (Z-75) 138kV circuit which shares a common transmission structure with the Z-73 circuit would no longer need to be reconducted with bundled 795 kcmil 20/7 ACSS-TW-HS conductor. However, this circuit would still be required to be established with single 795 kcmil 20/7 ACSS-TW-HS conductor⁸.

The conductors which will comprise the Z-73 and Z-75 transmission circuits are located on 20 existing double circuit lattice towers. The LON describes the replacement of these 20 structures with new double circuit steel monopoles to support the bundled 795 kcmil 20/7 ACSS-TW-HS conductor. If PJM provides notification of DLC's construction responsibility to no longer construct PJM baseline project b3061 in accordance with PJM's OATT, DLC will need to perform engineering analysis to determine the number of the existing double circuit lattice towers which will need to be replaced with new double circuit steel monopoles.

If PJM provides notification of DLC's construction responsibility to no longer construct PJM baseline project b3061 in accordance with PJM's OATT, there would be no impact to the zoning petition filed at Docket No. P-2019-3010087.

Project b3062

If PJM provides notification of DLC's construction responsibility to no longer construct PJM baseline project b3062 in accordance with PJM's OATT, there would be no impact to the LON or any project segments at Docket No. A-2019-3009698 and the zoning petition filed at Docket No. P-2019-3010087. Project b3062 involves modifications within DLC's existing West Mifflin substation and does not involve the locating and constructing high voltage transmission lines.

Project b3063

If PJM provides notification of DLC's construction responsibility to no longer construct PJM baseline project b3063 in accordance with PJM's OATT, approximately 4.8 miles of the existing Dravosburg-Wilson (Z-72) 138kV circuit would no longer need to be reconducted. This would reduce the number of circuits required to be reconducted within Docket No. A-2019-3009698 from five (5) to four (4) and would reduce the total number of circuit miles required to be reconducted within the LON from 19.2 miles to 14.4 miles.

If PJM provides notification of DLC's construction responsibility to no longer construct PJM baseline project b3063 in accordance with PJM's OATT, there would be no impact to the zoning petition filed at Docket No. P-2019-3010087.

Project b3065

If PJM provides notification of DLC's construction responsibility to no longer construct PJM baseline project b3065 in accordance with PJM's OATT, there would be minimal impact to the

⁷ PJM baseline project b3015.3 "Reconductor Dravosburg to West Mifflin (Z-73) 138 kV line"

⁸ PJM baseline project b3015.4 "Run new conductor on existing tower to establish the new Dravosburg-Elrama (Z-75) 138kV line."

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LON or any project segments at Docket No. A-2019-3009698 and no impact to the zoning petition filed at Docket No. P-2019-3010087. Project b3065 involves modifications within DLC's existing Wilson substation and does not, for the most part, involve the locating and constructing high voltage transmission lines. However, one transmission structure outside of Wilson Substation would no longer have to be replaced to expand the Wilson Substation yard to accommodate the additional circuit breaker.⁹

Project b3012

On 5/16/2019, PJM presented a scope change for baseline project b3012 which modified the planned Elrama-Mitchell (Z-111) 138kV tie line with FirstEnergy to instead establish an Elrama-Route 51 #3 138kV tie line with FirstEnergy.¹⁰ The PowerPoint presentation and PJM's comments at the September 12, 2019 TEAC meeting indicate that the scope change for baseline project b3012 is no longer required.

The LON as originally filed in Docket No. A-2019-3009698 reflects the original scope for baseline project b3012 to establish the Elrama-Mitchell (Z-111) tie line with FirstEnergy. As such, when PJM provides notification of DLC's construction responsibility to no longer construct PJM baseline project b3012 in accordance with PJM's OATT, no changes are required to the originally filed LON Docket No. A-2019-3009698.

When PJM provides notification of DLC's construction responsibility to no longer construct PJM baseline project b3012 in accordance with PJM's OATT, there would be no impact to the zoning petition filed at Docket No. P-2019-3010087.

C)

The baseline projects that are "Pending Resolution" by PJM are in no way related to or connected with the need for the Elrama Substation Control House Zoning Exemption Petition filed at Docket No. P-2019-3010087 and consolidated with this proceeding. See response B, above.

D)

As indicated above, PJM has not changed the required in-service dates for LON or any of its project segments. See response A, above.

⁹ Docket No. A-2019-3009698 Paragraph 17

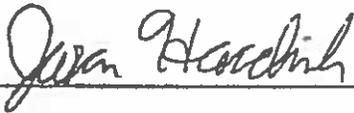
¹⁰ Reference Bureau of Technical Utility Services Data Request A-1 related to Docket No. A-2019-009698

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Letter of Notification of Duquesne Light :
Company, Filed Pursuant to 52 Pa. Code : Docket Nos. A-2019-3009698
Chapter 57 Subchapter G, for Approval to : P-2019-3010087
install a new 138 kV line and reconductor :
existing circuits to support the Southeast :
Capacity Project located in the Borough of :
Dravosburg, Borough of West Mifflin, Borough :
of Jefferson Hills, Union Township, and :
Forward Township in Allegheny and :
Washington Counties, Pennsylvania.

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: 9/16/2019