



Emily M. Farah  
Counsel, Regulatory

411 Seventh Avenue  
Mail drop 15-7  
Pittsburgh, PA 15219

Tel: 412-393-6431  
efarah@duqlight.com

September 23, 2019

**Via Electronic Filing**

Ms. Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
2<sup>nd</sup> Floor, Room N-201  
400 North Street  
Harrisburg, PA 17120

**RE: Supplement to the 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:

Enclosed please find the Certificate of Service for Duquesne Light Company's Supplement to the Southeast Capacity Project in the above captioned matter(s). If you have any questions, comments or concerns, please feel free to contact me.

Respectfully Submitted,

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

cc: Certificate of Service (w/out CSI)

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa Code § 1.54 (relating to service by a participant):

**FIRST-CLASS MAIL**

Bureau of Investigation & Enforcement  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor West  
PO Box 3265  
Harrisburg, PA 17105-3265

Office of Small Business Advocate  
300 North Second Street  
Suite 202  
Harrisburg, PA 1710-1923

Office of Consumer Advocate  
555 Walnut Street  
Forum Place, 5<sup>th</sup> Floor  
Harrisburg, PA 17101-1923

Dated: September 23, 2019



---

Emily M. Farah  
Duquesne Light Company  
411 Seventh Avenue, 15-7  
Pittsburgh, PA 15219  
Phone: 412-393-6431  
Email: [efarah@duqlight.com](mailto:efarah@duqlight.com)



Emily M. Farah  
Counsel, Regulatory

411 Seventh Avenue  
Mail drop 15-7  
Pittsburgh, PA 15219

Tel: 412-393-6431  
efarah@duqlight.com

September 23, 2019

**Via Hand Delivery**

Ms. Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
2nd Floor, Room-N201  
400 North Street  
Harrisburg, PA 17120

**RE: Supplement to the 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 or about April 15, 2019, Duquesne Light Company (“Duquesne Light” or the “Company”) filed the above-captioned Letter of Notification (“Southeast Capacity Project LON”). The Southeast Capacity Project LON is a PJM Interconnection, LLC (“PJM”) baseline reliability project that was reviewed by PJM’s Transmission Expansion Advisory Committee (“TEAC”) and approved by the PJM Board.<sup>1</sup> The scope of work included in the Southeast Capacity Project LON is needed to mitigate transmission system violations caused by proposed deactivations at the Beaver Valley Nuclear Power Station (“Beaver Valley”), Bruce Mansfield Power Plant (“Bruce Mansfield”), W.H. Sammis Power Plant (“Sammis”), Perry Nuclear Power Plant (“Perry”) and Davis-Besse Nuclear Power Station (“Davis-Besse”). The Southeast Capacity Project LON proposed beginning construction on September 30, 2019 to meet the required in-service date of May 2021.

---

<sup>1</sup> In accordance with the PJM Transmission Owners Agreement, Section 4.2, Duquesne Light Company was designated construction responsibility by PJM Interconnection, LLC on August 9, 2019 to build certain transmission enhancements and/or expansions as described in the Company’s Southeast Capacity Project LON. In accordance with the PJM Consolidated Transmission Owners Agreement, Section 4.2, Duquesne Light accepted responsibility to construct the designated projects, as assigned. The required in-service date for the reliability baseline projects is May 2021.



On or about Tuesday, July 23, 2019 Ohio Governor Mike DeWine signed a coal and nuclear generator bailout bill. As a result, FirstEnergy Solutions (“FE”) rescinded its deactivation notices for Sammis, Davis-Besse, and Perry.

At the September 12, 2019 PJM TEAC meeting, various Transmission Owners (“TOs”), including Duquesne Light, were instructed to pause work on certain select baseline projects in light of FE rescinding certain deactivations. Specifically, four of the thirteen PJM baseline projects identified in the initial Southeast Capacity Project LON were categorized as “pending resolution,” meaning the Company should pause work on PJM baseline projects b3061, b3062, b3063, and b3065, until PJM completes its analysis in February 2020. PJM did not rescind or change the required in-service date for the remaining nine baseline reliability projects. Certain FE generator deactivations will cause reliability criteria violations, and Duquesne Light remains required to address those violations to maintain safe and reliable service to its customers.

**Given the uncertainty related to the four baseline projects pending resolution, Duquesne Light respectfully requests that projects b3061, b3062, b3063, and b3065 be withdrawn from the Southeast Capacity Project LON. Inasmuch as the remaining nine baseline projects remain a part of the PJM Board-approved Regional Transmission Expansion Plan (“RTEP”), the Company intends to move forward with construction of the projects, subject to Commission approval. In order for the Company to meet the required in-service date, construction must begin as soon as possible. Duquesne Light will make an appropriate filing related to baseline projects b3061, b3062, b3063, and b3065 once PJM completes the required analysis. As the Southeast Capacity Project LON is uncontested, no response period to this Supplement is required. To the extent necessary, Duquesne Light respectfully requests the Commission waive any required response period for reasons previously stated.**

The enclosed one-line diagram, identified as “Supplement Exhibit 1,” shows the four baseline projects “pending resolution,” **in green**. As the enclosed contains Confidential Security Information (“CSI”) as that term is defined by 52 Pa. Code § 102.1, Duquesne Light respectfully requests the Commission treat Supplement Exhibit 1 as a confidential and a CSI-classified document. Below are generalized written explanations of how the scope of the work would change if PJM determines the four baseline projects “pending resolution” are no longer required. For a more detailed explanation, refer to the Company’s response to TUS Data Requests, Set III, filed on September 16, 2019.

- Project b3061: Approximately 3.0 miles of the Dravosburg-West Mifflin (Z-73) 138kV circuit would no longer need to be reconducted with a bundled conductor, but would still be required to be reconducted with a single conductor.
- Project b3062: Two new circuit breakers at the existing West Mifflin substation would not be needed.



- Project b3063: Approximately 4.8 miles of the existing Dravosburg-Wilson (Z-72) 138kV circuit would no longer need to be reconductored.
- Project b3065: One new circuit breaker at the existing Wilson substation would not be needed and one transmission structure outside of the existing Wilson Substation would not need to be replaced.

A copy of this cover letter and the enclosed Exhibit have been served upon TUS staff by hand-delivery. 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: Darren Gill (by hand delivery w/ encl.)  
Jeremy Haring (by hand delivery, w/ encl.)  
Aspassia Stahelski (by hand delivery, w/ encl.)