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17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
717-731-1970 Main
717-731-1985 Main Fax
www.postschell.com

Anthony D. Kanagy

akanagy@postschell.com
717-612-6034 Direct
717-720-5387 Direct Fax
File #: 178835

December 30, 2019

VIA HAND DELIVERY

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Application of Duquesne Light Company Filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for Approval of the Siting and Construction of the Mon-Fayette Tower Relocations Project in West Mifflin Borough, Borough of Dravosburg, and the City of Duquesne in Allegheny County, Pennsylvania
Docket No. A-2019-

Dear Secretary Chiavetta:

Enclosed, for filing on behalf of Duquesne Light Company, are the following:

1. Original of the Application and the Attachments in support of the Application;
2. Direct Testimony in support of the Application, which are contained in a separately-bound volume; and
3. A CD containing copies of the Application, Exhibits, Attachments, and Direct Testimony.

Also enclosed is a check in the amount of \$350 for payment of the filing fee.

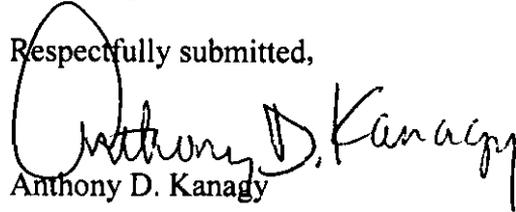
Copies of the Application and accompanying Attachments, and Direct Testimony are being served by certified mail, return receipt requested upon the parties indicated on the certificate of service.

Subject to Commission approval, construction is scheduled to begin July 2021 to meet an in-service date of March 2023.

Rosemary Chiavetta, Secretary
December 30, 2019
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If there are any questions concerning this matter, please contact me at the addresses or telephone numbers provided above.

Respectfully submitted,

A handwritten signature in black ink that reads "Anthony D. Kanagy". The signature is written in a cursive style with a large, prominent initial "A".

Anthony D. Kanagy

ADK/jl
Enclosures

cc: Certificate of Service
Renardo L. Hicks
Paul T. Diskin
Jordan Van Order
Kimberly Hafner

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Duquesne Light Company :
filed Pursuant to 52 Pa. Code Chapter 57, :
Subchapter G, for Approval of the Siting and : Docket No. A-2019-_____
Construction of the **Mon-Fayette Tower** :
Relocations Project in West Mifflin :
Borough, Borough of Dravosburg, and the :
City of Duquesne in Allegheny County, :
Pennsylvania :

APPLICATION OF DUQUESNE LIGHT COMPANY

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Duquesne Light Company (“Duquesne Light” or the “Company”) hereby files, pursuant to 52 Pa. Code § 57.72, this Application requesting Pennsylvania Public Utility Commission (“Commission”) approval to relocate portions of existing overhead 138 kV transmission lines. The Pennsylvania Turnpike Commission (“PTC”) is designing and constructing a highway extension, to extend the Mon-Fayette Expressway (“MFE”) from PA Route 51 in Jefferson Hills Borough to the Monongahela River in the City of Duquesne. This section is known as the PTC’s Southern Section of the MFE Project. Construction of the highway expressway will include substantial grading, construction of bridges, development of drainage and storm water management features, and a significant number of utility relocations. A portion of those utility relocations includes Duquesne Light electric transmission lines.

Through this Application, Duquesne Light seeks Commission approval of the siting and construction of the proposed Mon-Fayette Expressway Tower Relocation Project (the “Project”). Subject to the Commission’s approval, the Project has a scheduled construction start date of July

2021 to meet an in-service date of March 2023. In support of this application, Duquesne Light states as follows:

I. INTRODUCTION

1. This application is filed by Duquesne Light, a public utility that provides electric distribution, transmission, and provider of last resort services in Pennsylvania subject to the regulatory jurisdiction of the Commission.

2. Duquesne Light’s principal business address is:

Duquesne Light Company
2825 Beaver Avenue
Pittsburgh, PA 15233

3. Duquesne Light’s attorneys are:

Michael Zimmerman (PA ID # 323715)
Duquesne Light Company
411 Seventh Avenue
Mail Drop 15-7
Pittsburgh, PA 15219
Voice: 412-393-6268
Email: mzimmerman@duqlight.com

Anthony D. Kanagy (PA ID # 85522)
Garrett P. Lent (PA ID # 321566)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Voice: 717-731-1970
Fax: 717-731-1985
E-mail: akanagy@postschell.com
E-mail: glent@postschell.com

Duquesne Light’s attorneys are authorized to receive all notices and communications regarding this Application.

4. Duquesne Light furnishes electric service to approximately 600,000 customers throughout its certificated service territory, which includes all or portions of Allegheny and Beaver Counties and encompasses approximately 800 square miles in western Pennsylvania. Duquesne Light is a “public utility” and an “electric distribution company” as defined in Sections 102 and 2803 of the Pennsylvania Public Utility Code, 66 Pa.C.S. §§ 102, 2803.

5. Accompanying this Application is Statement No. 1, the direct testimony of Mr. Nicholas Anderson to provide a summary of the Project schedule and public outreach; Statement No. 2, the direct testimony of Ms. Sarah Soard related to the Siting Study; Statement No. 3, the direct testimony of Ms. Meenah Shyu related to Project need, design, and safety; and Statement No. 4, the direct testimony of Ms. Lesley Gannon related to Right-of-Way for the Project. Additionally, the following Attachments are included that provide additional detailed information regarding the proposed Project:

- Attachment 1 – PUC Cross-Reference Matrix
- Attachment 2 – Need Statement
- Attachment 3 – Cross-Sectional Diagrams of Typical Structures
- Attachment 4 – Environmental Assessment and Line Route Siting Study
- Attachment 5 – Data Sources Reviewed for Environmental Assessment and Line Route Siting Study
- Attachment 6 – Aerial Map of Alternatives Considered
- Attachment 7 – Topographical Map of Alternatives Considered
- Attachment 8 – Permit Matrix
- Attachment 9 – Map of the Affected Parcels and Landowners
- Attachment 10 – Affected Parcels and Landowners Matrix
- Attachment 11 – Duquesne Light’s Design Criteria, Electromagnetic Field Practices and Application, and Safety Practices
- Attachment 12 – Duquesne Light’s Vegetation Management Practices
- Attachment 13 – Public Notices Required by 52 Pa. Code § 69.3102
- Attachment 14 – PTC Summary and Examples of Outreach

6. This Application, including the accompanying Attachments and Statements, which are incorporated herein by reference, contains all the information required by 52 Pa. Code §§ 57.72(c), 69.1101, 69.3102 – 69.3107.

II. NEED FOR THE PROJECT

7. The Project is required as a result of the PTC's construction of the MFE, a four-project highway extension. The PTC has completed three MFE projects to date. The remaining MFE project will comprise a four-lane, limited access highway that will connect PA Route 51 in Jefferson Hills, Allegheny County to I-376 in Monroeville, Allegheny County. This MFE project consists of two segments. The next segment of the MFE scheduled for construction beginning in 2021 will run from PA Route 51 in Jefferson Hills to the Monongahela River in the City of Duquesne.

8. This MFE segment interferes with existing utility facilities, including portions of certain Duquesne Light electric transmission facilities in West Mifflin Borough and the City of Duquesne. Duquesne Light must therefore relocate all such facilities in such a manner that they do not interfere with the MFE design or the PTC's construction activities.

9. Additional information on the need for this Project is included in Attachment 2, Need Statement, and Statement No. 3, direct testimony of Meenah Shyu.

III. DESCRIPTION OF THE PROPOSED TRANSMISSION LINE

A. OVERVIEW OF THE PROPOSED PROJECT

10. Construction of the MFE will include a significant number of utility relocations, including Duquesne Light transmission lines. Duquesne Light has identified five distinct, largely noncontiguous areas (herein referred to as the "Study Areas") in which the MFE conflicts with

existing Duquesne Light transmission infrastructure. These five areas each require a portion of Duquesne Light's electric transmission facilities to be relocated to avoid the highway extension.

11. The MFE affects portions of each of the following 138 kilovolts (kV) transmission circuits:

- Z-13 Wilson Substation to West Mifflin Substation
- Z-14 West Mifflin Substation to Wilson Substation
- Z-15 Dravosburg Substation to U.S.S Clariton Substation
- Z-57 Universal Substation to U.S.S. Illinois
- Z-72 Wilson Substation to Dravosburg Substation
- Z-73/Z-74 Dravosburg Substation to West Mifflin Substation
- Z-75 Dravosburg Substation to Elrama Substation
- Z-76/Z-77 Wilmerding Substation to Dravosburg Substation
- Z-78 Logans Ferry Substation to Dravosburg Substation
- Z-79 U.S.S. Illinois Substation to Dravosburg Substation
- Z-91 Rankin Substation to Dravosburg Substation

12. These existing affected portions constitute approximately 4.4 miles of 138kV overhead transmission lines and 83 supporting structures. They will be replaced with approximately 4.28 miles of relocated 138kV overhead transmission lines supported by 56 new steel structures.

13. The entire Project will be located in Allegheny County. Approximately 3.4 miles of the Project will be located within West Mifflin Borough, approximately 0.9 miles will be located within the City of Duquesne, and approximately 0.1 miles will be located within the Dravosburg Borough.

B. ENGINEERING DESCRIPTION

14. Based on preliminary engineering, the Project will require installation of 56 new steel pole structures, consisting of double-circuit monopoles (41 structures), single-circuit steel H-Frames (3 structures), single-circuit monopoles (8 structures), and single-circuit three-pole structures (4 structures). A total of 83 structures will be removed as part of the Project: 5 steel poles, 36 steel lattice towers, and 42 wood poles.

15. All existing structures identified in the five areas of interest will be replaced with new steel structures. The existing steel pole and lattice structures range in height from 84' to 121'. The existing wood-pole structures for Z-91 range in height from 60' to 80'. The new steel structures will largely consist of self-supporting, tubular, weathering steel structures that will range in height from 55' to 195', with an average height of approximately 125'. The new steel poles will largely consist of drilled pier concrete shaft foundations. The average height increase for the new structures is 25 ft. The average span between these structures will be approximately 800'. The longest span is approximately 1,300'.

16. Cross-sectional diagrams showing the typical design of the support structures are provided in Attachment 3 to this Application.

17. The overhead 138 kV circuit design will utilize three or six power conductors per circuit¹ and one or two shield wires. The power conductors for this Project will be 795 kcmil,² 20/7 ACSS-TW-HS³ conductors. The new shield wire will consist of 7#8 Alumoweld and fiber

¹ Some relocated 138 kV spans consist of single conductor (three conductors per circuit); others of twin-bundled conductor (six conductors per circuit).

² 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.

³ ACSS-TW-HS stands for aluminum conductor steel supported, trapezoidal-shaped aluminum strands, high strength conductors

optic ground wire. Fiber optic ground wire will be installed from structures 3127 to 3123 and structures 7109 to 7018. The fiber optic ground wire will provide lightning protection and a communication path between substations.

18. Z-13 (Wilson Substation to West Mifflin Substation) will be reconducted from Duquesne Light structure 3127 to 7124. The three existing 795 kcmil, 20/7 ACSS-TW-HS conductors and one 5/16" Steel will be replaced with three 795 kcmil, 20/7 ACSS-TW-HS conductors and one 7#8 Alumoweld. The reconductor section length is approximately 0.6 miles, which increases the line length by approximately 0.1 miles.

19. Z-14 (West Mifflin Substation to Wilson Substation) will be reconducted from Duquesne Light structure 3227 to 7224. The three existing 795 kcmil, 26/7 ACSR conductors and one 5/16" Steel will be replaced with three 795 kcmil, 20/7 ACSS-TW-HS conductors and one 7#8 Alumoweld. The reconductor length is approximately 0.6 miles, which increases the line length by approximately 0.1 miles.

20. Z-15 (Dravosburg Substation to U.S.S Clairton Substation) will be reconducted from Duquesne Light structure 3227 to 7224 and 3209 to 7220. The three existing 795 kcmil, 26/7 ACSR conductors and one 5/16" Steel will be replaced with three 795 kcmil, 20/7 ACSS-TW-HS conductors and one 7#8 Alumoweld. The reconductor length is approximately 1.1 miles, which increases the line length by approximately 0.2 miles.

21. Z-57 (Universal Substation to U.S.S. Illinois) will be reconducted from Duquesne Light structure 1158-3B to 1159B. The three existing 853.7 kcmil, 24/13 ACAR conductors and one 7#8 Alumoweld will be replaced with three 795 kcmil, 20/7 ACSS-TW-HS conductors and one 7#8 Alumoweld, shared with Z-79. The reconductor length is approximately 0.4 miles, which does not change the line length materially.

22. Z-72 (Wilson Substation to Dravosburg Substation) will be reconducted from Duquesne Light structure 3006 to 3009 and 3027 to 7024. The six existing 795 kcmil, 20/7 ACSS-TW-HS conductors and two 5/16" Steel will be replaced with six 795 kcmil, 20/7 ACSS-TW-HS conductors and two 7#8 Alumoweld. The reconductor length is approximately 1.2 miles, which increases the line length by approximately 0.2 miles.

23. Z-73/Z-74 (Dravosburg Substation to West Mifflin Substation) will be reconducted from Duquesne Light structure 7018 to 7109. The six existing 795 kcmil, 20/7 ACSS-TW-HS conductors and one 5/16" Steel will be replaced with six 795 kcmil, 20/7 ACSS-TW-HS conductors and one 7#8 Alumoweld. The reconductor length is approximately 0.5 miles, which increases the line length by approximately 0.1 miles.

24. Z-75 (Dravosburg Substation to Elrama Substation, to be installed as part of the Southeast Capacity Project, Docket No. A-2019-3009698) will be reconducted from Duquesne Light structure 3127 to 7124 and 7018 to 7109. Between structures 3127 and 7124, the three existing 795 kcmil, 20/7 ACSS-TW-HS conductors and one fiber optic cable will be replaced with three 795 kcmil, 20/7 ACSS-TW-HS conductors and one fiber optic cable. Between structures 7018 and 7109, the six existing 795 kcmil, 20/7 ACSS-TW-HS conductors and one fiber optic cable will be replaced with six 795 kcmil, 20/7 ACSS-TW-HS conductors and one fiber optic cable. The reconductor length is approximately 1.1 miles, which increases the line length by approximately 0.2 miles.

25. Z-76/Z-77 (Wilmerding Substation to Dravosburg Substation) will be reconducted from Duquesne Light structure 1147A to 7029 and 1151A to 1159A. Between structures 1147A and 7029, the three existing 853.7 kcmil, 24/13 ACAR conductors and one 7#7 Copperweld will be replaced with three 795 kcmil, 20/7 ACSS-TW-HS conductors and one 7#8

Alumoweld, shared with Z-77. Between structures 1151A and 1159A, the three existing 853.7 kcmil, 24/13 ACAR conductors and one 7#7 Copperweld and 7#8 Alumoweld will be replaced with three 795 kcmil, 20/7 ACSS-TW-HS conductors and one 7#8 Alumoweld. The reconductor length is approximately 1.7 miles, which does not materially change the line length.

26. Z-78 (Dravosburg to Logans Ferry) will be reconducted from Duquesne Light structure 1147B to 7129 and 1151B to 1159B. Between structures 1147B and 7129, the three existing 795 kcmil, 20/7 ACSS-TW-HS conductors and one 7#8 Alumoweld will be replaced with three 795 kcmil, 20/7 ACSS-TW-HS conductors and one 7#8 Alumoweld, shared with Z-79. Between structures 1151B and 1159B, the three existing 853.7 kcmil, 24/13 ACAR conductors and one 5/16" Steel and one 7#8 Alumoweld will be replaced with three 795 kcmil, 20/7 ACSS-TW-HS conductors and one 7#8 Alumoweld. The reconductor length is approximately 1.7 miles, which does not materially change the line length.

27. Z-79 (Dravosburg to U.S.S. Illinois) will be reconducted from Duquesne Light structure 1147B to 7129 and 1151B to 1158-3B. Between structures 1147B and 7129, the three existing 795 kcmil, 20/7 ACSS-TW-HS conductors and one 7#8 Alumoweld will be replaced with three 795 kcmil, 20/7 ACSS-TW-HS conductors and one 7#8 Alumoweld, shared with Z-78. Between structures 1151B and 1158-3B, the three existing 853.7 kcmil, 24/13 ACAR conductors and one 7#8 Alumoweld will be replaced with three 795 kcmil, 20/7 ACSS-TW-HS conductors and one 7#8 Alumoweld, shared with Z-57. The reconductor length is approximately 1.9 miles, which does not materially change the line length.

28. Z-91 (Rankin Substation to Dravosburg Substation) will be reconducted from Duquesne Light structure 7031 to 7037 and 7047 to 7049. The three existing 853.7 kcmil, 24/13 ACAR conductors and one 7#8 Alumoweld will be replaced with three 795 kcmil, 20/7 ACSS-

TW-HS conductors and one 7#8 Alumoweld. The reconductor length is approximately 1.2 miles, which decreases the line length by approximately 0.3 miles.

29. Conductor design maximum operating temperature is limited to 392 degrees F for ACSS conductors and 200 degrees F for all other conductors.

30. All structures shall be grounded per Duquesne Light specifications, with footing resistance not to exceed 10 ohms.

31. The Project will be designed to meet, and generally exceed, the National Electrical Safety Code (“NESC”), 2017 edition’s minimum requirements. For clearance criteria, the Project will be designed with a 10% buffer on top of the required minimum NESC clearances for reconducted areas. The areas which have new steel structures and conductors will be designed with an average clearance of 55.3 ft and a minimum clearance of 30 ft from grade, including the final grade of the turnpike construction.

IV. SITING ANALYSIS

A. SUMMARY OF SITING ANALYSIS

32. In accordance with the Commission’s regulations at 52 Pa. Code § 57.72(c), Duquesne Light conducted a multi-faceted analysis to determine the preferred route for each study area of the Project. The results of the siting study are contained in the “Environmental Assessment and Line Route Study,” which is provided as Attachment 4 to this application.

33. The goal of Duquesne Light’s siting analysis for the Project was to determine the most suitable route in each Study Area to interconnect the relocated transmission line facilities, while minimizing the impact to natural and human environments and avoiding unreasonable routes and costs.

34. Many sources of information were used to develop data for the environmental assessment and line routing study. These sources of information are summarized in Attachment 5 in this application.

35. There are unique elements to each project related to geography, land use, environmental and socioeconomic setting, the project's construction requirements, the political climate, public involvement, regulatory requirements, and the schedule needs of the project. These unique elements influence the range of initial possibilities and the siting criteria selected. Most projects (particularly new transmission lines) contend with a suite of competing commercial, technical, environmental, and land use criteria. Duquesne Light conducted an extensive siting study that considered these criteria in preparing this Project. For this Project, however, the proximity of the MFE, and the generally short length of affected transmission line spans, constrained the number of practicable routing options.

36. As discussed in further detail in Attachment 4, the transmission facility relocations in each Study Area are independent of each other. The choice of a route option in any given Study Area does not impact the availability or characteristics of route options in any other Study Area. The relocation options were therefore evaluated on a Study Area-by-Study Area basis.

37. Once the alternative routes for each study area were identified, Duquesne Light undertook an analysis of potential impacts of each route in each study area to various constraints and engineering considerations. The alternative routes for each Study Area were reviewed in detail and compared using a combination of information collected in the field, Geographic Information System data sources, public and agency input, engineering and constructability

considerations, and the collective knowledge and experience of Duquesne Light in conjunction with its siting consultants.

38. Using the analysis described above, Duquesne Light selected a preferred route for each Study Area that best balanced the overall impacts, constructability, and costs of the Project. The rationale for selecting the preferred route for each Study Area was derived from the accumulation of the siting decisions made throughout the process, the knowledge and experience of Duquesne Light and its siting consultants, comments from the local officials and regulatory agencies, and the comparative analysis of potential impacts of preferred and alternate routes. The preferred routes for all five Study Areas, taken collectively, comprise the Project's Proposed Route.

39. A detailed description of the process used to select the preferred route for each Study Area of the Project is provided in Attachment 4 to the Siting Application.

B. SELECTION OF THE PROPOSED ROUTE

40. Using the siting analysis described above, Duquesne Light identified one (1) Proposed Route, consisting of the combined preferred routes in each Study Area. There exist many potential alternatives to the Proposed Route because the available routes in each Study Area can be evaluated and selected independently of each other. For purposes of drawing comparisons in this Application among potential routes, the Proposed Route is compared to the combined alternate routes across all Study Areas. In addition, the preferred route for each Study Area is compared to the alternate route for that Study Area.⁴

⁴ Only one route was used for Study Area 4, as there is only one practical relocation option.

41. The overall length of the Proposed Route is approximately 4.28 miles and the combined alternate routes have an overall length of approximately 4.97 miles. All route options utilize new right-of-way (“ROW”) to avoid the interference with the MFE.

42. As discussed above, each of the Study Areas was analyzed separately, as they each contain distinct segments of transmission facilities that must be relocated. Study Area 1 is the farthest south, and both the preferred and alternate routes are just over 0.55 mile long. Study Area 2 is farther north along the Project and also requires an approximately 0.5-mile line relocation. Study Area 3 requires approximately 1 mile of line relocation. Study Area 4 has only one practical relocation option of 0.28 miles, which is included as part of both the proposed and alternate routes. Study Area 5 is the largest. The preferred route in Study Area 5 is approximately 1.7 miles; the alternate route is approximately 2.6 miles.

43. The preferred and alternate routes are depicted on aerial photography in Attachment 6 and on topographic maps in Attachment 7. Details maps of the route review are included in the Environmental Assessment and Line Route Siting Study in Attachment 4.

44. Duquesne Light, in conjunction with its siting consultants, undertook a detailed comparison of each alternative. A detailed explanation of the analysis and comparison of the alternatives is provided in Attachment 4 to this application.

45. Duquesne Light has held in-person meetings with local elected officials and commercial, industrial, and residential property owners to give a description of the Project and potential impacts. These meetings were held from spring through autumn of 2019.⁵

46. Based on the types of publicly available datasets obtained and the availability of collected field data, a list of evaluation criteria was developed to evaluate potential routes.

⁵ Please refer to Statement No. 1, direct testimony of Nicholas Anderson, for further discussion of PTC’s and Duquesne Light’s public outreach related to the MFE.

Evaluation criteria were identified under three broad headings: ecological, land use/cultural, and technical. Multiple individual criteria were evaluated under these broad headings. The criteria were selected based on their relevance to the Project, the Study Area, and the availability and quality of the data sets. Technical criteria are evaluated to compare engineering design, constructability, and cost constraints so that any preliminary routes can be identified as technically feasible. Criteria identified as constraints should generally be avoided where possible and minimized where avoidance is not practical. Criteria identified as opportunities provide locations where placement of the new route would be beneficial or otherwise minimize impacts to protected resources. Table 3-1 in the Environmental Assessment and Line Route Siting Study (Attachment 4) provides the complete list of evaluation criteria and the relevance of the data for electric transmission line routing.

47. Duquesne Light made efforts during the siting process to identify any potentially regulated resources and avoid impacts to these resources where possible. Once identified in the digital mapping data, routes were selected to avoid or minimize anticipated impacts to these resources where practicable. These resources include wetlands, streams, high-quality streams, protected species habitat, cultural resources, historic properties, hazardous waste sites, and other regulated resources.

48. The greatest disparities in biological and natural resource criteria between the preferred and alternative routes (i.e., the most impactful biological and natural resource criteria) in each Study Area include the total acreage of tree clearing, the number of high-quality stream crossings, and the acreage of floodplain crossed. Each of the factors has the potential to increase cost of construction and annual maintenance as well as the potential for impacts to sensitive species. Although the preferred routes have a higher acreage of required tree clearing (43 acres

versus 32 acres), they have fewer high-quality stream crossings (8 streams versus 12 streams) and less acreage crossing floodplains (1.6 acres versus 4.2 acres).

49. The most impactful land use and cultural criterion is the proximity to residences. There are far fewer residences within 100 feet of the Proposed Route (51 residences versus 142 residences) compared to the combined alternate routes. The Proposed Route is also closer to fewer residences within 1,000 feet of the ROW than the combined alternate routes (1,037 residences versus 1,543 residences). Therefore, the Proposed Route is less impactful than the combined alternate routes in this respect.

50. The most impactful technical criteria include the overall length of the route, the acreage of steep slope, the number of hazardous waste sites, and the acreage of challenging geologic conditions. The overall length also has a direct correlation to the overall project cost. The Proposed Route is advantageous in that respect as it is shorter in overall length (22,600 feet versus 26,250 feet). The acreage of ROW crossing steep slopes (greater than 15%) is nearly equal between the Proposed and combined alternate Routes. The Proposed Route has fewer known hazardous waste sites within 1,000 feet of the ROW than the combined alternate routes (2 sites versus 5 sites). Additionally, the presence of challenging geologic conditions, such as previously mined lands or karst topography, can increase the risk of construction costs due to increased foundation complexity to account for potential voids underground. The Proposed Route crosses significantly less acreage of challenging geology (12 acres versus 22 acres) than the combined alternate routes.

51. The evaluation of these siting criteria support the selection of the Proposed Route as the optimal balance of all siting criteria as compared to any other combination of preferred

and alternate routes. The Proposed Route is depicted in Figures 1-1, 2-1, 3-1, 4-1, and 5-1 in Appendix A of the Environmental Assessment and Line Route Siting Study (Attachment 4).

52. A list of the local, State and Federal governmental agencies and their requirements in connection with the construction or maintenance of the Project is provided in Attachment 8 to this Application.

53. Where potential impacts are unavoidable, Duquesne Light will obtain any necessary permits and comply with the permit conditions and best management practices during construction. Best management practices may include tree clearing during certain times of the year, fencing sensitive resources to protect them from impact during construction, use of timber matting stream and wetland crossings and utilizing erosion and sedimentation controls, as appropriate. A list of the potential permits or clearances that may be required to ultimately construct this Project have been included as Attachment 8 to the Siting Application. However, permits and approvals that will be required for this Project will not be definitively known until the final route is approved.

54. A detailed explanation of the selection of the preferred routes is provided in Attachment 4 to this Application.

V. RIGHTS-OF-WAY

55. The right-of-way width is generally determined by the structure type, design tensions, span length, and conductor “blowout” (the distance the wires are moved by a crosswind).

56. Most of the right-of-way for the proposed relocations of Duquesne Light infrastructure will be 125 feet in width. In areas where the right-of-way is less than 125 feet,

Duquesne Light will design and construct the line to fit within the right-of-way while maintaining all necessary clearances.

57. Duquesne Light's vegetation management practices are based on maintenance rights acquired, voltage of the line involved, proximity of trees to the facilities, and the species and condition of trees involved. Specific vegetation management practices are included in Attachment 12.

58. Duquesne Light will review impacts of any unique geological, scenic, or natural areas within the Project. Duquesne Light will also review any impacts on state lands, national parks, state parks, or local parks within the Project area.

59. Duquesne Light has obtained the field survey data acquired by the PTC for the highway extension to evaluate potential impacts from the Project to identified resources and submit required applications to agencies.

60. Duquesne Light will coordinate with the Pennsylvania State Historic Preservation Office ("PA SHPO") to determine whether the Project will have any effects on cultural resources. This evaluation area includes the Study Area evaluated for the Project. Duquesne Light will comply with any surveys or conditions required by the PA SHPO.

61. Duquesne has obtained the Wetland and Stream Identification Delineation and Report (WDR) from the PTC for the Project to identify locations of environmental resources. The Project is anticipated to cross streams and wetlands. Aerial crossings of environmental resources will qualify under Waiver 3 of the Pa. Code Chapter 105 and will be exempt from permitting requirements. Temporary access roads and work areas will be selected to reduce and avoid impacts to environmental resources to the maximum extent practical. Where impacts to

environmental resources cannot be avoided, Duquesne Light will obtain necessary permits in accordance with the regulations under Pa. Code Chapter 105.

62. Duquesne Light will acquire the National Pollution Discharge Elimination System (“NPDES”) permit for earth disturbance activities in accordance with Pa. Code Chapter 102 and will comply with the permit conditions placed on those approvals. Duquesne Light will develop an Erosion and Sedimentation Control Plan (“ESCP”) and a Post Construction Stormwater Management/Site Restoration (“PCSM/SR”) Plan as required by the NPDES and applicable regulations.

63. Duquesne Light has completed a desktop review of Pennsylvania Natural Heritage Program (“PNHP”) Core Habitat data for the Study Area. As part of the permit requirements for the Project, Duquesne Light has obtained a Pennsylvania Natural Diversity Inventory (“PNDI”) receipt that addresses habitat under the jurisdiction of the Pennsylvania Department of Conservation and Natural Resources (“DCNR”), the Pennsylvania Fish and Boat Commission (“PFBC”), the Pennsylvania Game Commission (“PGC”), and the U.S. Fish and Wildlife Service (“USFWS”). Based on the results of the PNDI review, Study Areas 1 through 4 were cleared with no further review requested by these agencies. Study Area 5 required no further review with any agency except the PFBC. The species of concern for the PFBC are all aquatic species, because the Study Area extends to the Monongahela River. As no work will be required in the river, no impacts to aquatic species are anticipated. Once the final route is approved, Duquesne Light will undertake regulatory consultation with any of the above-listed agencies, as required.

64. The parcel boundaries and names and addresses of all known persons, corporations and other entities of record owning property along the Proposed Route are provided in Attachments 9 (map) and 10 (landowner information) of this Application.

65. There are a total of 14 different owners of 22 parcels along the Proposed Route.

66. The PTC is acquiring all required right-of-way from property owners affected by the MFE, including owners of parcels along the Proposed Route. As discussed in Statement No. 4, Direct Testimony of Lesley Gannon, except for license agreements associated with new railroad crossings, Duquesne Light will acquire all new right-of-way required for the Project from the PTC. Duquesne Light will not acquire right-of-way from other property owners.

VI. HEALTH AND SAFETY

67. The Project will not create any unreasonable risk of danger to public health or safety.

68. The Project will be designed, constructed, operated, and maintained in a manner that meets or surpasses all applicable NESC minimum standards. The Project will also conform to Duquesne Light's design criteria, construction standards, and safety practices. *See* Attachment 11 – Duquesne Light’s Design Criteria, Electromagnetic Field Practices and Application, and Safety Practices.

69. The Project is not expected to have any impact on pipelines, other utilities, or telecommunications.

70. This Project is within 0.8 miles of the Allegheny County Airport. The nearest major airport, Pittsburgh International Airport, is located approximately 18.17 miles from the Project area. Duquesne Light will submit the Federal Aviation Administration (“FAA”) applications and will comply with their applicable requirements.

VII. CONSTRUCTION COST AND IN-SERVICE DATE

71. Duquesne Light will own, operate, and maintain the transmission lines associated with the proposed Project.

72. The PTC will bear all costs of the proposed Project.

73. The estimated cost to design and construct the proposed Project using Proposed Route is \$50 to \$70 million.

74. The proposed Project has a scheduled construction start date of July 2021 to meet an in-service date of March 2023.

VIII. NOTICE AND SERVICE

75. Duquesne Light has provided or will provide, as applicable, public notices in accordance with Section 69.3102 of the Commission's Interim Siting Guidelines, 52 Pa. Code § 69.3102. The public notices for this project are provided in Attachment 13 to this Application.

76. Copies of this Application and the Notice of Filing are being served in accordance with the provisions of Section 57.74 of the Commission's regulations, 52 Pa. Code § 57.74.

77. A copy of this Application is available for public examination during ordinary business hours at Duquesne Light's offices at 411 Seventh Avenue, Pittsburgh, PA 15219.

78. As soon as practicable after the filing of this Application, Duquesne Light will publish notice of the filing in two newspapers of general circulation in the area of the Project. This notice will: (a) note the filing with the Commission; (b) provide brief description of the project and its location; (c) provide area locations where the complete application may be reviewed by the public; and (d) provide any additional information as directed by the Commission.

79. Duquesne Light also requests that the Commission publish notice of this Application in the *Pennsylvania Bulletin*.

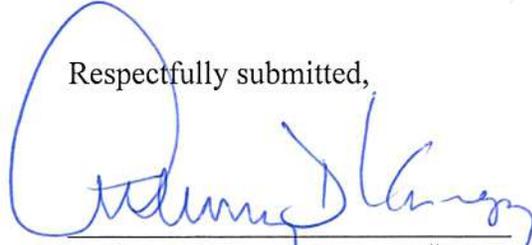
IX. RELATED PROCEEDINGS

80. Duquesne Light is not aware of any litigation in progress related to the proposed Project.

X. CONCLUSION

WHEREFORE, Duquesne Light Company respectfully requests that the Pennsylvania Public Utility Commission approve the siting and construction of the Mon-Fayette Tower Relocations Project in Allegheny County, Pennsylvania as explained above and in the Attachments and testimony included with this Application.

Respectfully submitted,



Michael Zimmerman (PA ID # 323715)
Duquesne Light Company
411 Seventh Avenue
Pittsburgh, PA 15230-1930
Voice: 412-393-6268
Email: mzimmerman@duqlight.com

Anthony D Kanagy (PA ID # 85522)
Garrett P. Lent (PA ID # 321566)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Voice: 717-731-1970
Fax: 717-731-1985
E-mail: akanagy@postschell.com
E-mail: glent@postschell.com

Date: December 30, 2019

Attorneys for Duquesne Light Company

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **APPLICATION** 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).

VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED

PA Department of Environmental Protection
Southwest Regional Office
400 Waterfront Drive
Pittsburgh, PA 15222
Attn.: Ronald Schwartz

PA Historical and Museum Commission
State Historic Preservation Office
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120
Attn.: Douglas C. McLearn

Leslie S. Richards, Secretary
PA Department of Transportation
Commonwealth Keystone Building
400 North Street, 9th Floor
Harrisburg, PA 17120
Attn.: Jason D. Sharp
Attn.: Dennis Ciufu

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

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

Office of Small Business Advocate
555 Walnut Street
Forum Place, 1st Floor
Harrisburg, PA 17101

Allegheny County Conservation District
33 Terminal Way, Suite 325b
Pittsburgh, PA 15219

Allegheny County Board of Commissioners
Rich Fitzgerald, County Executive
436 Grant Street
Pittsburgh, PA 15219

Borough of West Mifflin
Brian Kamauf, Borough Manager
1020 Lebanon Road
West Mifflin, PA 15122

Borough of Dravosburg
Steve Volpe
226 Maple Avenue
Dravosburg, PA 15034

City of Duquesne
Mayor's Office
12 South Second Street
Duquesne, PA 15110

U.S. Army Corps of Engineers
Pittsburgh District
1000 Liberty Avenue
Pittsburgh, PA 15222
Attn.: Greg Curry

Federal Aviation Administration
Mail Processing Center
Southwest Regional Office
Obstruction Evaluation Group
10101 Hillwood Parkway
Fort Worth, TX 76177
Attn: Andrew Hollie

U.S. Fish and Wildlife Service
PA Field Office, Endangered Species Section
110 Radnor Road, Suite 101
State College, PA 16801
Attn.: Robert M. Anderson

PA Department of Conservation
& Natural Resources
Bureau of Forestry, Ecological Services Section
400 Market Street
P.O. Box 8552
Harrisburg, PA 17105-8552
Attn.: Daniel A. Devlin

PA Fish and Boat Commission
Division of Environmental Services
595 E. Rolling Ridge Drive
Bellefonte, PA 16823
Attn.: Heather Smiles

PA Game Commission
Bureau of Wildlife Habitat Management
Division of Environmental Planning and Habitat
Protection
2001 Elmerton Avenue
Harrisburg, PA 17110-9797
Attn.: Peter F. Sussenbach

United States Steel Corporation
600 Grant Street, Rm 1381
Pittsburgh, PA 15219

Duquesne Light Company
1800 Seymour Street
Pittsburgh, PA 15233

Union Railroad Company
1200 Penn Avenue, Suite 300
Pittsburgh, PA 15213

Pennsylvania Turnpike Corporation
PO Box 67676
Harrisburg, PA 17106-7676

Date: December 30, 2019

West Mifflin Area School District
515 Camp Hollow Road
West Mifflin, PA 15122

Festival Fun Park, LLC
Kennywood
PO Box 543185
Dallas, TX 75354-3185

Clairton Sportsman Club
412 Coal Valley Road
Clairton, PA 15025-3810

16 New England LLC
747 Frank Street
Pittsburgh, PA 15227

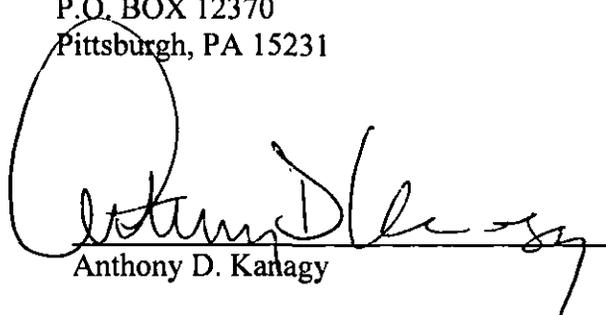
Edith Jane Clapper
Ethel M. Smith
Esther F. Smith
4952 Rt 580 Highway
Cherry Tree, PA 15724-6407

Daniel J. and Marilyn Nemchick
623 Bettis Road
West Mifflin, PA 15122-2804

Richard C. Smith
721 Saint Agnes Lane
West Mifflin, PA 15122

Westwood & Associates, LLC
2050 Hayden Boulevard
Elizabeth, PA 15037

Allegheny County Airport
Pittsburgh International Airport
Landside Terminal, Suite 4000
P.O. BOX 12370
Pittsburgh, PA 15231



Anthony D. Kanagy