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March 9, 2020

Via Electronic Filing

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

**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 Borough of West Mifflin, Borough of Dravosburg, and the City of Duquesne in Allegheny County, Pennsylvania
Docket No. A-2020-3015225**

Dear Secretary Chiavetta:

Pursuant to the *Prehearing Conference Order* entered February 21, 2020, in the above-captioned proceeding, please find enclosed the Prehearing Memorandum of Duquesne Light Company.

Please contact me if you have any questions, comments, or concerns.

Respectfully,

A handwritten signature in blue ink, appearing to read "Michael Zimmerman", is written over a light blue horizontal line.

Michael Zimmerman
Counsel, Regulatory
Duquesne Light Company

Enclosures

Cc: Honorable Mary Long (*via email*)
Jeanmarie McLaughlin, Pennsylvania Turnpike Commission (*via email*)
Pennsylvania Public Utility Commission Bureau of Investigation & Enforcement
Office of the Consumer Advocate
Office of the Small Business Advocate

**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-2020-3015225
Construction of the **Mon-Fayette Tower** :
Relocations Project in West Mifflin :
Borough, Borough of Dravosburg, and the :
City of Duquesne in Allegheny County, :
Pennsylvania :

**PREHEARING MEMORANDUM
OF DUQUESNE LIGHT COMPANY**

Pursuant to the Prehearing Conference Order of Administrative Law Judge Mary D. Long dated February 21, 2020, and 52 Pa. Code §5.221 - § 5.224, Duquesne Light Company (“Duquesne Light” or the “Company”) hereby submits its Prehearing Conference Memorandum.

I. INTRODUCTION AND BACKGROUND

On December 30, 2019, Duquesne Light filed, pursuant to 52 Pa. Code § 57.72, a line siting application requesting Pennsylvania Public Utility Commission (“Commission”) approval to relocate portions of existing overhead 138 kV transmission lines affected by the Pennsylvania Turnpike Commission’s (“PTC”) planned construction of the Mon-Fayette Expressway (“MFE”) extension (hereinafter called the “Project” or “MFE Tower Relocation Project”), docketed at A-2020-3015225.

The Project is required because the next segment of the MFE scheduled for construction, which will run from PA Route 51 in Jefferson Hills to the Monongahela River in the City of Duquesne, interferes with 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.

On February 21, 2020, a Prehearing Order was issued, which provided that formal protests and petitions to intervene must be filed in accordance with 52 Pa. Code (relating to public utilities) on or before March 4, 2020. On February 11, 2020, Duquesne Light was served with the PTC's intervention. As of the date of this memorandum, Duquesne Light not been served with any other interventions, or any protests, in this matter.

II. ISSUES

Duquesne Light published notice of this prehearing conference, pursuant to the Prehearing Conference Order, in two newspapers of general circulation: the Valley Mirror, on January 30, 2020; and the Pittsburgh Post-Gazette, on February 7, 2020. Duquesne Light filed proofs of publication of such notices on February 19, 2020.

On February 11, 2020, the PTC filed a Petition to Intervene in this proceeding. The PTC has authorized Duquesne Light to represent that it does not object to any aspect of Duquesne Light's siting application. Duquesne Light is not aware of any other actual or potential intervenors.

In the absence of adverse parties, there is no need for an evidentiary hearing before an Administrative Law Judge. Duquesne Light respectfully requests that this matter be assigned to the Commission's Bureau of Technical Utility Services. In the alternative, if this matter is not transferred to the Commission's Bureau of Technical Utility Services and an evidentiary hearing is held, Duquesne Light and the Turnpike Commission have agreed to the following proposed procedural schedule.

Date	Event
April 24, 2020	Written Direct Testimony of All Non-Duquesne Light Parties
May 22, 2020	Written Rebuttal Testimony of All Parties
June 5, 2020	Written Surrebuttal Testimony of All Parties
June 12, 2020	Written Rejoinder
June 23, 2020	Evidentiary Hearings in Pittsburgh beginning at 10:00 a.m. in 2 nd Floor Hearing Room
July 21, 2020	Main Briefs Due
August 4, 2020	Reply Briefs Due

III. WITNESSES

Duquesne Light has provided the testimonies of the following witnesses with its initial filing.

Witness	Subjects Addressed
Nicholas Anderson Duquesne Light Company 2825 New Beaver Avenue Pittsburgh, PA 15233	Description of the Project Public Communications Related to the Project
Sarah Soard Project Manager for Environmental Services Burns McDonnell 9400 Ward Parkway Kansas City, MO 64114	Summary of the Siting Study Selection of the Proposed Routes for the Project
Meenah Shyu Manager of Civil & Transmission Line Engineering Group Duquesne Light Company 2841 New Beaver Avenue Pittsburgh, PA 15233	Need for the Project Design and Safety Features of the Project
Lesley Gannon Senior Manager, Real Estate & Rights-of-Way Duquesne Light Company 1800 Seymour Street Pittsburgh, PA 15233	Rights-of-Way Identification and Acquisition

Duquesne Light reserves the right to call additional witnesses, as necessary, if a hearing is held in this proceeding. If Duquesne Light determines an additional witness or witnesses will be necessary for any portion of its case, the Presiding Officer and all parties of record will be notified promptly.

IV. EVIDENCE

Duquesne Light will rely on the testimony of its witnesses. Duquesne Light will also rely on the testimony of the other parties to the proceeding, if any. Duquesne Light will present relevant exhibits to support its own testimony, including but not limited to, materials obtained from other parties, if any, through discovery and cross-examination.

V. PROCEDURAL RULES / DISCOVERY

Duquesne Light is not requesting any modification of the Commission's procedural rules regarding discovery are necessary at this time. Duquesne Light agrees to cooperate with the parties regarding any requested modification to the Commission's procedural discovery rules.

VII. SERVICE ON DUQUESNE LIGHT

Duquesne Light will be represented in this case by the counsel named below. Copies of all documents should be served on Duquesne Light as follows:

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Respectfully Submitted,



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Date: March 9, 2020

Attorneys for Duquesne Light Company