



**Emily M. Farah**  
Counsel, Regulatory

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

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

February 14, 2022

**Via Electronic Filing**

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

**Re: Letter of Notification of Duquesne Light Company for the Replacement and Relocation of Transmission Structures on the Z-71 and Z-88 138kV Transmission Line Circuits in Allegheny County, PA  
Docket No. A-2022-3030453**

Dear Secretary Chiavetta,

Enclosed please find a copy of Duquesne Light Company's responses to Bureau of Technical Utility Services' Data Requests - Set I in the above-captioned proceeding. Please feel free to contact me with any questions, comments, or concerns.

The enclosed Exhibit A-2 shall be marked CONFIDENTIAL and as containing Confidential Security Information ("CSI") as defined by 35 P.S. § 2141.2 and Critical Energy Infrastructure Information ("CEII") as defined by 18 C.F.R. § 388.113(2). The confidential/CEII version of the data responses are being transmitted to the Secretary's Bureau via overnight mailing. The non-confidential responses are being electronically filed and are being served on all parties in this proceeding.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Emily M. Farah", is written over a light blue circular stamp.

Emily M. Farah

Enclosures

cc: Jordan Van Order ([jvanorder@pa.gov](mailto:jvanorder@pa.gov)) (w/non-confidential responses)

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the Application and Exhibits upon the participants listed below in accordance with the requirements of 52 Pa. Code § 57.74(b) (relating to service of copies):

**VIA FIRST-CLASS MAILING (PUBLIC VERSION ONLY)**

PA Historical & Museum Commission  
c/o Chairman  
State Museum Building  
400 North Street  
Harrisburg, PA 17120

PA Department of Transportation  
Keystone Building  
400 North Street, 9<sup>th</sup> Floor  
Harrisburg, PA 17120

Pennsylvania Department of  
Environmental Protection  
Southwest Regional Office  
400 Waterfront Drive  
Pittsburgh, PA 15222

U.S. Fish and Wildlife Service  
Pennsylvania Field Office  
110 Radnor Road, Suite 101  
State College, PA 16801

PA Department of Conservation  
And Natural Resources, Bureau of Forestry,  
Ecological Service Section  
400 Market Street  
Harrisburg, PA 17105-8552

PA Game Commission  
Bureau of Wildlife Habitat  
Division of Environmental Planning  
Habitat Protection  
2001 Elmerton Avenue  
Harrisburg, PA 17110

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

PA Fish & Boat Commission  
Division of Environmental Svcs  
595 E. Rolling Ridge Drive  
Bellefonte, PA 16823

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

Office of Small Business Advocate  
Sharon Webb  
Steve Gray  
555 Walnut Street, 1<sup>st</sup> Floor  
Harrisburg, PA 17101

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

William Mullins  
2028 Stewart Road, Lot 61  
Melbourne, FL 32935

City of Pittsburgh Planning  
Commission  
200 Ross St., Civic Bldg, Third Fl.  
Pittsburgh, PA 15219

Baldwin Borough Planning Department  
Municipal Complex  
3344 Churchview Ave.,  
Pittsburgh, PA 15227

Allegheny County Planning Dept.  
One Chatham Center, Suite 900  
112 Washington Pl.  
Pittsburgh, PA 15219

KBM Management LLC  
1000 Becks Run Rd.  
Pittsburgh, PA 15210

Norfolk Southern  
4600 Deer Path Rd., Suite 202  
Harrisburg, PA 17110

KBM Management LLC  
1000 Becks Run Rd.  
Pittsburgh, PA 15210

Anthony Arnold  
5646 Willow Terrace Dr.  
Bethel Park, PA 15102

Norma & Ruth Yeager  
987 Beck Run Rd.  
Pittsburgh, PA 15210

KBM Management, LLC  
998 Becks Run Rd.  
Pittsburgh, PA 15210

Community Specialist Corporation  
900 Agnew Rd.  
Pittsburgh, PA 15227

Department of Environmental  
Resources  
Attn: Bureau of Environmental  
Planning;  
400 Waterfront Drive  
Pittsburgh, PA 15222

Peoples Natural Gas  
Office of the President  
375 N Shore Dr.  
Pittsburgh, PA 15212

Pennsylvania American Water  
Office of the President  
852 Wesley Drive  
Mechanicsburg, PA 17055

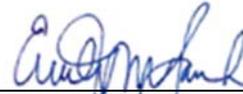
Edward Palumbo  
995 Becks Run Rd.  
Pittsburgh, PA 15210

Housing Authority, City of Pittsburgh  
200 Ross St., Fl. 10  
Pittsburgh, PA 15219

Columbia Gas of Pennsylvania  
Office of the President  
121 Champion Way  
Canonsburg, PA 15317

Arthur Perdios  
991 Becks Run Rd.  
Pittsburgh, PA 15210

Urban Redevelopment Authority, City of Pittsburgh  
200 Ross St., Fl. 10  
Pittsburgh, PA 15219



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Emily M. Farah (Pa. I.D. No. 322559)  
Duquesne Light Company  
411 Seventh Avenue, Mail Drop 15-7  
Pittsburgh, PA 15219  
Phone: 412-393-6431  
E-mail: [efarah@duqlight.com](mailto:efarah@duqlight.com)

*Counsel for Duquesne Light Company*

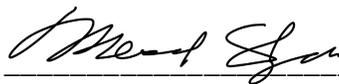
Date: February 14, 2022

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Letter of Notification of Duquesne Light :  
Company for Replacement and Relocation of :  
Transmission Structures on the Z-71 and Z-88 : Docket No. A-2022-3030453  
138kV Transmission Line Circuits in :  
Allegheny County, Pennsylvania :  
:  
:  
:

**VERIFICATION**

I, Meenah Shyu, PE, being the General Manager, Engineering 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).



\_\_\_\_\_  
Meenah Shyu, PE  
General Manager, Engineering

Date: February 14, 2022

Bureau of Technical Utility Services  
Interrogatories

Duquesne Light Company  
Docket No. A-2022-3030453

Set I

Witness: Christopher Melnik

**TUS I- A1**

A-1 Reference the Letter of Notification, Paragraph 8. Please state the PJM project ID for the proposed project. If the proposed project does not have a PJM project ID, please explain why.

**Response:**

Duquesne Light Company does not currently have a PJM Regional Transmission Expansion Plan (RTEP) Upgrade ID assigned to the proposed project. However, DLC is in the process of submitting this project to PJM as a supplemental project, and will provide the PJM RTEP Upgrade ID at a later date.

Bureau of Technical Utility Services  
Interrogatories

Duquesne Light Company  
Docket No. A-2022-3030453

Set I

Witness: Matthew Geary

**TUS I- A2**

A-2 Reference the Letter of Notification, Paragraph 9. Please provide a more detailed description of the landslide activity.

**Response:**

A detailed description of the landslide activity is provided on pages 2-4 of the enclosed report titled “Field Reconnaissance – Assessment of Active Slope Movement 138 & 345 kV (Z-88 & Z-71) Transmission Lines - Becks Run to Carson Substation Transmission Towers/Monopoles 3640, 3641, 3642, 3643, 3653-1, 3654-1, and 3655.”

Exhibit A-2 shall be marked **CONFIDENTIAL** and as containing Confidential Security Information (“CSI”) as defined by 35 P.S. § 2141.2 and Critical Energy Infrastructure Information (“CEII”) as defined by 18 C.F.R. § 388.113(2).

**ATTACHMENT 2**  
**CONFIDENTIAL - CEII**

Bureau of Technical Utility Services  
Interrogatories

Duquesne Light Company  
Docket No. A-2022-3030453

Set I

Witness: Matthew Geary

**TUS I- A3**

A-3 Reference the Letter of Notification, Paragraph 10. Please provide a copy of the assessment.

**Response:**

The assessment is contained in CONFIDENTIAL Exhibit A-2.

Upon the issuance of CONFIDENTIAL Exhibit A-2, Duquesne Light Company (“DLC”) initiated engineering and design for the proposed project, and implemented the recommended risk mitigation actions to seal cracks in the ground in and around the affected landslide areas.

While the proposed project is pending before the Pennsylvania Public Utility Commission, DLC has implemented a monitoring program for the existing towers 3640, 3641, 3642, and 3643. The monitoring program consists of sensors installed on each of the four previously mentioned towers. The tower mounted sensors are configured to detect movement from a landslide that could impact the orientation of the steel lattice at each location. DLC’s monitoring program also installed sensors within the ground in front of Towers 3640 and 3642. These sensors are meant to detect landslide movement within the ground and provide some information about whether that movement is deep enough to potentially compromise the tower foundations. If sensor data reaches a threshold value, then the system will automatically notify DLC and consultant geotechnical engineering personnel to evaluate. To date, DLC or its engineering personnel have not been notified that the ground movement has reached or exceeded the threshold value.

Bureau of Technical Utility Services  
Interrogatories

Duquesne Light Company  
Docket No. A-2022-3030453

Set I

Witness: Matthew Geary

**TUS I- A4**

A-4 Reference the Letter of Notification, Paragraph 33. Please explain whether any alternative solutions were considered. If not, please explain why.

**Response:**

DLC considered two alternative alignments to accomplish project objectives in addition to the alignment submitted as part of this LON. DLC also considered stabilization of the existing structures and surrounding ground as an alternative to the proposed project.

The proposed project alignment was chosen because the Company's evaluation determined that it was the best long-term solution to address ground movement in and around the existing towers and prevent potential future landslide damage. The proposed project's alignment was determined to be the least invasive to surrounding communities and most feasible from an engineering perspective. See LON, Paragraphs 51 and 58.

Bureau of Technical Utility Services  
Interrogatories

Duquesne Light Company  
Docket No. A-2022-3030453

Set I

Witness: Ryan Karmonick

**TUS I- A5**

A-5 Reference the Letter of Notification, Paragraph 51. Please state the approximate width of the new and existing right-of-way.

**Response:**

With respect to the proposed alignment, the Company will manage a transmission corridor 75 feet from the centerline of the alignment on each side (150 feet total). See Attachment 3 of the LON.

With respect to the current alignment, the Company currently manages a transmission corridor 42.5 feet from the centerline of the alignment on each side (85 feet total).

Bureau of Technical Utility Services  
Interrogatories

Duquesne Light Company  
Docket No. A-2022-3030453

Set I

Witness: Emily Farah

**TUS I- A6**

A-6 Reference the Letter of Notification, Certificate of Service. Please provide a certificate of service consistent with 52 Pa. Code 57.74(C).

**Response:**

On February 8, 2022, the Company filed a supplemental Certificate of Service in this matter that included the parties as required by 52 Pa. Code § 57.74(c). Such parties were served with the Application and non-confidential exhibits.

In addition to adding parties, the Company removed one of the two addresses for William Mullens. Specifically, the Company removed Mr. Mullin's Becks Run Road address from the updated Certificate of Service because the Company received a receipt from the United States postal service indicating that the Application was undeliverable and unclaimed. However, the Company did not receive an indication that the mailing was undeliverable to Mr. Mullin's alternative address listed on the original Certificate of Service.

A complete list of the parties that have been served with the Application and the non-confidential exhibits are included with this response and identified as Exhibit A-6.

# EXHIBIT

A-6



**Emily M. Farah**  
Counsel, Regulatory

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

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

February 8, 2022

**Via Electronic Filing**

Ms. Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building, 2<sup>nd</sup> Floor  
400 North 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 Replace and Relocate Towers on the Z-71 and Z-88 138kV Circuits to Mitigate and Prevent Landslide Damage in the Town of Arlington, and Baldwin Borough, Allegheny County, PA  
Docket No. A-2022-3030453**

Dear Secretary Chiavetta:

On January 11, 2022, Duquesne Light Company (“Duquesne Light” or the “Company”), filed the *Letter of Notification of Duquesne Light Company, Filed Pursuant to 52 Pa. Code Chapter 57 Subchapter G, for Approval to Replace and Relocate Towers on the Z-71 and Z-88 138kV Circuits to Mitigate and Prevent Landslide Damage in the Town of Arlington, and Baldwin Borough, Allegheny County, PA* (“Application”) at the above-captioned docket. The enclosed supplemental Certificate of Service verifies that the parties listed in 52 Pa. Code § 57.74(c) were served with the Application and non-confidential exhibits, by certified mailing.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Emily Farah", is written over a light blue circular stamp.

Emily Farah  
Counsel, Regulatory

Enclosures

cc: Certificate of Service (w/encl.)

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the Application and Exhibits upon the participants listed below in accordance with the requirements of 52 Pa. Code § 57.74(b) (relating to service of copies):

**VIA CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

PA Historical & Museum Commission  
c/o Chairman  
State Museum Building  
400 North Street  
Harrisburg, PA 17120

PA Department of Transportation  
Keystone Building  
400 North Street, 9<sup>th</sup> Floor  
Harrisburg, PA 17120

Pennsylvania Department of  
Environmental Protection  
Southwest Regional Office  
400 Waterfront Drive  
Pittsburgh, PA 15222

U.S. Fish and Wildlife Service  
Pennsylvania Field Office  
110 Radnor Road, Suite 101  
State College, PA 16801

PA Department of Conservation  
And Natural Resources, Bureau of Forestry,  
Ecological Service Section  
400 Market Street  
Harrisburg, PA 17105-8552

PA Game Commission  
Bureau of Wildlife Habitat  
Division of Environmental Planning  
Habitat Protection  
2001 Elmerton Avenue  
Harrisburg, PA 17110

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

PA Fish & Boat Commission  
Division of Environmental Svcs  
595 E. Rolling Ridge Drive  
Bellefonte, PA 16823

**FIRST CLASS MAILING (CERTIFICATE OF SERVICE ONLY)**

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

Office of Small Business Advocate  
Sharon Webb  
Steve Gray  
555 Walnut Street, 1<sup>st</sup> Floor  
Harrisburg, PA 17101

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Aron Beatty  
555 Walnut Street  
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City of Pittsburgh Planning Commission  
200 Ross St., Civic Bldg, Third Fl.  
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Baldwin Borough Planning Department  
Municipal Complex  
3344 Churchview Ave.,  
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Allegheny County Planning Dept.  
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Bethel Park, PA 15102

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987 Beck Run Rd.  
Pittsburgh, PA 15210

KBM Management, LLC  
998 Becks Run Rd.  
Pittsburgh, PA 15210

Community Specialist Corporation  
900 Agnew Rd.  
Pittsburgh, PA 15227

Department of Environmental Resources  
Attn: Bureau of Environmental Planning;  
400 Waterfront Drive  
Pittsburgh, PA 15222

Peoples Natural Gas  
Office of the President  
375 N Shore Dr.  
Pittsburgh, PA 15212

Pennsylvania American Water  
Office of the President  
852 Wesley Drive  
Mechanicsburg, PA 17055

Columbia Gas of Pennsylvania  
Office of the President  
121 Champion Way  
Canonsburg, PA 15317

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Pittsburgh, PA 15210

Arthur Perdios  
991 Becks Run Rd.  
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Housing Authority, City of Pittsburgh  
200 Ross St., Fl. 10  
Pittsburgh, PA 15219

Urban Redevelopment Authority, City of Pittsburgh  
200 Ross St., Fl. 10  
Pittsburgh, PA 15219



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Emily M. Farah (Pa. I.D. No. 322559)  
Duquesne Light Company  
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Phone: 412-393-6431  
E-mail: [efarah@duqlight.com](mailto:efarah@duqlight.com)

*Counsel for Duquesne Light Company*

Date: February 8, 2022