

**PENNSYLVANIA
PUBLIC UTILITY COMMISSION
Harrisburg, PA 17120**

Public Meeting held June 16, 2022

Commissioners Present:

Gladys Brown Dutrieuille, Chairman
John F. Coleman, Jr., Vice Chairman
Ralph V. Yanora

Letter of Notification of Duquesne Light
Company for approval to Replace and Relocate
Transmission Structures on the Z-71 and Z-88
138 kV Transmission Lines in Baldwin Borough
and the City of Pittsburgh, Allegheny County,
Pennsylvania

Docket Number:
A-2022-3030453

ORDER

BY THE COMMISSION:

On January 11, 2022, Duquesne Light Company (Duquesne), Utility Code 110150, filed a Letter of Notification (LON) pursuant to 52 Pa. Code § 57.72(d)(1)(vi) of the Pennsylvania Public Utility Commission's (Commission) transmission line siting regulation. For the reasons expressed in this Order, the LON is approved.

Copies of the LON were served in accordance with Section 57.72(d)(3) and 57.74(b) & (c), 52 Pa. Code §§ 57.72(d)(3), 57.74(b) & (c), on the PA Department of Transportation, PA Department of Environmental Protection, PA Historical and Museum Commission,

Allegheny County Commissioners, Baldwin Borough and the City of Pittsburgh, *et al.* No protests were filed. No hearings were held.

Duquesne requests approval to replace and relocate transmission structures on the Z-71 and Z-88 138 kV transmission lines in Baldwin Borough and the City of Pittsburgh, Allegheny County, Pennsylvania. Duquesne Light states that the project area is located between existing transmission structure 3653 and transmission structure 3638 and is approximately 0.7 miles in length. Application ¶22.

Duquesne states that replacement and relocation of the structures is necessary to mitigate and prevent the risk of damage to Duquesne's electrical infrastructure in a landslide prone corridor. Application ¶15.

Duquesne submits that recent landslide activity in close proximity to four existing lattice towers on 138 kV circuit Z-71 Carson Substation to Dravosburg South Substation (Z-71) and 138 kV circuit Z-88 Carson Substation to Bettis Substation (Z-88) have prompted a new geologic assessment of the landslide susceptibility of the tower corridor. Duquesne also submits that further progression of the observed landslides or the formation of new landslides within the corridor could compromise the foundational stability of the existing towers. Duquesne further submits that ground and helicopter inspections in 2018 and 2019 revealed that the existing towers are vulnerable to future ground movement which may compromise their structural integrity. Application ¶¶9-12.

Duquesne avers that pending relocation of the transmission structures it has implemented a monitoring program for the four existing lattice towers. Duquesne also avers that the monitoring program consists of sensors installed on each of the towers and that the sensors are configured to detect movement from a landslide that could impact the orientation of the steel lattice at each location. Duquesne avers that its monitoring program

also installed sensors within the ground. 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. Duquesne further avers that if sensor data reaches a threshold value, then the system will automatically notify Duquesne and consultant geotechnical engineering personnel to evaluate. Duquesne Data Request Response No. 3.

Duquesne states that to address these issues it will install new, relocated, transmission structures with deeper foundations to ensure continued safety and reliability of the Z-71 and Z-88 138 kV circuits and make the Z-71 and Z-88 circuits more resilient against landslide-related hazards (Tower Replacement Project). Application ¶13.

Duquesne states that it considered one alternative solution and two alternative alignments to accomplish the project objectives. Duquesne also states that the alternative solution consisted of stabilizing the existing structures and surrounding ground as an alternative to the Tower Replacement Project. The proposed Tower Replacement Project was chosen because Duquesne'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. Duquesne further states that the alignment was determined to be the least invasive to surrounding communities and most feasible from an engineering perspective. Duquesne Data Request Response No. 4.

Duquesne states that it will install approximately 0.7 miles of new conductor and remove nine existing transmission line structures and install five new structures. The new structures will include both single-circuit and double-circuit steel pole structures and will average approximately 110 feet in height. Duquesne also states that the average height of the existing transmission structures is approximately 89 feet in height. Duquesne further states that the Tower Replacement Project has been designed and will be built within new

and existing right-of-way approximately 150 feet in width. The structures will be shifted approximately 150 feet to 400 feet from the current alignment. Application ¶¶22-23, 30, 32 and Duquesne Data Request Response No. 5.

Duquesne asserts that the Tower Replacement Project will be designed, constructed, operated and maintained in a manner that meets or surpasses all applicable Duquesne and National Electrical Safety Code minimum standards and all applicable legal requirements. Application ¶61.

Duquesne states that the total estimated cost for the Tower Replacement Project is approximately \$6.4 million to \$12 million and will be paid for by Duquesne. Construction of the project is anticipated to commence in September 2022 with a proposed in-service date of September 2023. Application ¶¶17-18.

Section 57.72 authorizes the abbreviated LON siting application process in lieu of an application for the following:

- (i) An HV line which is proposed to be located entirely on an existing transmission line right-of-way, so long as the size, character, design, or configuration of the proposed HV line does not substantially alter the right-of-way.
- (ii) An HV line which is proposed to be located entirely within a public road.
- (iii) An HV line which is proposed to be located entirely within applicant's existing transmission line right-of-way and the property of the sole customer to be served by the line, so long as the size, character, design, or configuration of the proposed HV line does not substantially alter the right-of-way.

- (iv) A line for which the voltage is proposed to be increased above its present levels so long as the size, character, design, or configuration of the proposed HV line does not substantially alter the right-of-way.
- (v) An HV line which is to be reconductored or reconstructed so long as the size, character, design or configuration of the proposed HV line does not substantially alter the right-of-way.
- (vi) An HV line having a proposed route of 2 miles or less.

52 Pa. Code § 57.72(d).

We agree with Duquesne that the formal Duquesne Letter of Notification and manner in which it was filed conforms to the requirements of 52 Pa. Code § 57.72(d)(1)(vi) because the Tower Replacement Project relocates a section of the Z-71 and Z-88 transmission lines which is less than 2 miles in length. Moreover, the Commission has reviewed the filing and does not find it to be inconsistent with the applicable law or Commission policy regarding transmission line siting and, therefore, to be in the public interest.

We also note that our approval of the Letter of Notification does not address the issues of accounting treatment, and cost recovery; **THEREFORE,**

IT IS ORDERED:

1. That the Letter of Notification filed by Duquesne Light Company for approval to replace and relocate transmission structures on the Z-71 and Z-88 138 kV transmission lines located in Baldwin Borough and the City of Pittsburgh, Allegheny County,

Pennsylvania, is hereby approved.

2. That upon completion of the subject project, Duquesne Light Company shall file the final project cost with the Commission.

3. That upon completion of Ordering Paragraph 2, this proceeding at Docket No. A-2022-3030453 be closed.

BY THE COMMISSION,

A handwritten signature in black ink, appearing to read "Rosemary Chiavetta". The signature is written in a cursive, flowing style.

Rosemary Chiavetta
Secretary

ORDER ADOPTED: June 16, 2022

ORDER ENTERED: June 16, 2022