



**Emily M. Farah**  
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June 17, 2022

**Via Electronic Filing**

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

**RE: Petition of Duquesne Light Company for Finding That an Electrical Equipment Building Equipment at the Proposed Watson Substation in Allegheny County, Pennsylvania is Reasonably Necessary for the Convenience or Welfare of the Public Docket No. P-2022-3032356**

Dear Secretary Chiavetta,

Enclosed please find a copy of Duquesne Light Company's Prehearing Memorandum, submitted pursuant to the Prehearing Order dated May 10, 2022 in the above-captioned matter. Please contact me with any questions, comments, or concerns.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Emily M. Farah".

Emily M. Farah  
Counsel, Regulatory

Enclosure

cc: Certificate of Service (w/ encl.)  
Administrative Law Judge Mary D. Long (via email, w/encl.)

**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):

**VIA ELECTRONIC MAILING**

Bureau of Investigation & Enforcement  
Richard Kanaskie  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor West  
Harrisburg, PA 17105-3265  
[rkanaskie@pa.gov](mailto:rkanaskie@pa.gov)

Office of Small Business Advocate  
Sharon Webb  
555 Walnut Street, 1<sup>st</sup> Floor  
Harrisburg, PA 17101  
[swebb@pa.gov](mailto:swebb@pa.gov)

Office of Consumer Advocate  
Patrick Cicero, Acting Consumer Advocate  
555 Walnut Street  
Forum Place, 5<sup>th</sup> Floor  
Harrisburg, PA 17101-1923  
[pcicero@paoca.org](mailto:pcicero@paoca.org)

Law Bureau  
Pennsylvania Public Utility Commission  
Renardo Hicks  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17105  
[rehicks@pa.gov](mailto:rehicks@pa.gov)

City of Pittsburgh Solicitor's Office  
414 Grant Street #313  
Pittsburgh, PA 15219  
[Kryisia.kubiak@pittsburghpa.gov](mailto:Kryisia.kubiak@pittsburghpa.gov)

**VIA FIRST CLASS MAILING**

City of Pittsburgh  
Planning Commission  
414 Grant Street  
Pittsburgh, PA 15219

City of Pittsburgh  
City Planning Zoning & Development  
200 Ross Street, #3  
Pittsburgh, PA 15219

Dated: June 17, 2022

  
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Phone: 412-393-6431  
Email: [efarah@duqlight.com](mailto:efarah@duqlight.com)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light Company for :  
Finding That an Electrical Equipment Building :  
Equipment at the Proposed Watson Substation :  
in Allegheny County, Pennsylvania is : P-2022-3032356  
Reasonably Necessary for the Convenience or :  
Welfare of the Public. :

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PREHEARING MEMORANDUM  
OF DUQUESNE LIGHT COMPANY

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Pursuant to the May 10, 2020 Prehearing Conference Order of Administrative Law Judge (“ALJ”) Mary D. Long (“Presiding Officer”), Section 333 of the Public Utility Code, 66 Pa. C.S. § 333, and in anticipation of the Prehearing Conference scheduled for Wednesday, June 22, 2022, Duquesne Light Company (“Duquesne Light” or the “Company”) provides the following information:

**I. INTRODUCTION AND BACKGROUND**

On May 2, 2022, Duquesne Light petitioned the Pennsylvania Public Utility Commission (“Commission”), pursuant to 52 Pa. Code § 5.41 and 53 P.S. § 10619, for a finding that a building to shelter control equipment (“Control Equipment Building”) at the proposed Watson Substation site in Allegheny County, Pennsylvania is reasonably necessary for the convenience or welfare of the public and, therefore, exempt from any local zoning ordinance (“Zoning Petition”). The Zoning Petition proposed an in-service date of December 2025.

On May 6, 2022, a Call-In Telephone Prehearing Conference was set for Wednesday, June 22, 2022. By Order dated May 10, 2022, the Presiding Officer directed the parties to prepare and distribute a prehearing memorandum by June 17, 2022.

## II. ISSUES

Notice of this prehearing conference and the deadline for intervention in the above-captioned matter appeared in the Pennsylvania Bulletin on May 21, 2022, and in the Pittsburgh Post-Gazette on May 22, 2022, and June 9, 2022. Duquesne Light is not aware of any actual or potential intervenors, and the deadline set for interventions in this matter (June 6, 2022) has passed. In the absence of adverse parties, there is no need for an evidentiary hearing before an ALJ.

Given the foregoing, Duquesne Light respectfully requests that this matter be assigned to the Commission's Bureau of Technical Utility Services.

## III. WITNESSES

In the unlikely event an evidentiary hearing with an ALJ is required, Duquesne Light will provide the testimonies of the below witnesses, as may be necessary.

<b>Witness</b>	<b>Subjects Addressed</b>
Jason A. Harchick Director, Grid Optimization & Strategy, Transmission Planning Duquesne Light Company 2839 New Beaver Avenue Pittsburgh, PA 15233	Need for the Project Description of the Project
Meenah Shyu General Manager, Engineering Duquesne Light Company 2841 New Beaver Avenue Pittsburgh, PA 15233	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	Property Elements for the Project

Duquesne Light specifically reserves the right to call additional witnesses. As soon as Duquesne Light has determined whether 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 direct, rebuttal, and surrebuttal 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. DISCOVERY / LITIGATION SCHEDULE**

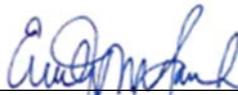
Duquesne Light is not requesting any modification(s) of the Commission’s procedural rules regarding discovery at this time. Duquesne Light agrees to cooperate with any and all intervening parties regarding any requested modification(s) to the Commission’s procedural discovery rules. To the extent other parties intervene in this proceeding, and such interventions require a litigation schedule, Duquesne Light will work with any parties to develop a schedule.

**VI. SERVICE ON DUQUESNE LIGHT**

Duquesne Light will be represented in this case by the counsel named below. Counsel consents to the electronic service of documents in this proceeding.

Emily M. Farah  
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Pittsburgh, PA 15219  
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E-mail: [efarah@duqlight.com](mailto:efarah@duqlight.com)

Respectfully Submitted,



Emily M. Farah (PA ID No. 322559)  
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411 Seventh Avenue, Mail Drop 15-7  
Pittsburgh, PA 15211

Date: June 17, 2022