



Michael Zimmerman
Senior Counsel, Regulatory

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

Tel: 412-393-6268
mzimmerman@duqlight.com

September 30, 2022

Via Electronic Filing

Ms. Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120

**Re: Petition of Duquesne Light Company for a Finding That an Electrical Equipment
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 Duquesne Light Company's supplemental response to the Data Requests Propounded by the Bureau of Technical Utility Services ("TUS") Set I A-2 in the above-captioned proceeding.

Please contact me with any questions, comments, or concerns

Respectfully Submitted,

A handwritten signature in blue ink that reads "Michael Zimmerman".

Michael Zimmerman
Senior Counsel, Regulatory

Enclosure

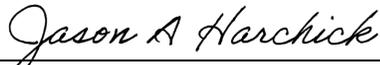
Cc: Jordan Van Order (jvanorder@pa.gov)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition Of Duquesne Light Company :
For Finding that an Electrical : **Docket No. P-2022-3032356**
Equipment Building at the Proposed :
Watson Substation is Reasonably :
Necessary for the Convenience or
Welfare of the Public

VERIFICATION

I, Jason A. Harchick, hereby state that the facts set forth above are true and correct to the best of my knowledge, information and belief, and I expect 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).



Jason A. Harchick
Director, Grid Optimization and Strategy

Dated: September 30, 2022

Duquesne Light Company
Docket No. P-2022-3032356

Bureau of Technical Utility Services
Data Requests

Set I

Witness: Jason Harchick

TUS A-2

Reference the Petition, Paragraph 12. Please state the anticipated increase in reliability in terms of the customer average interruption duration index, system average interruption duration index, and system average interruption frequency index.

Response:

Because of the unpredictable nature of outages, the Company cannot measure the anticipated increase in reliability in terms of customer average interruption duration index (“CAIDI”), system average interruption duration index (“SAIDI”), and system average interruption frequency index (“SAIFI”). One of the most important aspects of Watson Substation that cannot be expressed in outage index metrics is the resiliency that it provides to Downtown Pittsburgh.

As described in the petition, Watson Substation will be established significantly closer to the customers in the Downtown, Uptown, and Hill District neighborhoods.

For Downtown, the Watson Substation will provide a back-up electrical supply to Downtown Pittsburgh’s existing, sole 23-kilovolt (“kV”) source from Brunot Island Substation, which exists approximately 3 miles from the city on an island. Watson Substation is 1.5 miles from the city center with no river crossings that limit underground cable thermal ratings, like Brunot Island Substation. Additionally, 23/11kV transformers are to be installed at Watson Substation which will back-up downtown Pittsburgh’s sole 11kV supply from Forbes Substation.

Additionally, Watson Substation will unify significant portions of the Downtown network by providing a secondary source and back-up supply for four (4) of Pittsburgh’s five (5) downtown network areas. By establishing this back-up supply, the Watson Substation will reduce the restoration times to the Downtown neighborhood for events which impact the supply from the Brunot Island and Forbes Substations.

For the Uptown and Hill District neighborhoods, the Watson Substation will reduce circuit exposure to events that cause outages and will have a positive impact to reliability. Presently, there is a single existing 23kV distribution circuit in the Uptown and Hill District neighborhoods and this circuit does not have any circuit ties. The Watson

Substation will provide additional 23kV distribution circuits and circuit ties in these neighborhoods which enable faster restoration to unfaulted sections of 23kV distribution circuits through remote operation of these circuit ties.

Supplemental Response:

By way of further response: The primary need for the Project is to improve the resiliency of the Downtown load block by diversifying the sources that serve it. The Downtown neighborhood and portions of the Uptown neighborhood are presently fed with network circuits from two (2) different substations with incompatible voltages: (1) the 23-kilovolt (“kV”) Brunot Island Substation, and (2) the 11-kV Forbes Substation. Watson Substation will provide a back-up to the Downtown neighborhood for unplanned outages impacting the two existing substations and other networked circuits. Additionally, the 23kV-to-11kV transformers, network switches, and other equipment to be installed through this Project will allow the Company to transfer additional network areas to be fed by Watson Substation in response to catastrophic events. As previously indicated, these measures will reduce the restoration times to the Downtown and neighboring areas for events which impact the supply from the Brunot Island and Forbes Substations.

The Project addresses additional system needs as well, as described in the Petition and the Company’s prior responses to TUS A-1 and TUS A-2.

The Project is estimated to cost approximately \$192 million, of which \$36 million is functionalized as transmission-related, and \$156 million is distribution-related.