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October 14, 2026

VIA ELECTRONIC FILING

Mr. Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
2nd Floor, Room-N201
400 North Street
Harrisburg, PA 17120

**Re: Pennsylvania Accelerated Transmission and Energy Redevelopment (PATER)
Study
M-2026-3059601**

Dear Secretary Homsher:

Enclosed for filing please find Duquesne Light Company's Reply Comments in the above referenced proceeding. If you have any questions regarding the information contained in this filing, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "LBQ", with a long horizontal flourish extending to the right.

Lindsay A. Baxter
Senior Manager, Energy Policy and Public Affairs

Cc:
Elizabeth Barnes, ebarnes@pa.gov

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

:
Pennsylvania Accelerated Transmission and
Energy Redevelopment (PATER) Study : Docket No. M-2026-3059601
:

**COMMENTS OF
DUQUESNE LIGHT COMPANY**

I. INTRODUCTION

On February 19, 2026, the Pennsylvania Public Utility Commission (“PUC” or “Commission”) adopted an Order to facilitate a Pennsylvania Accelerated Transmission and Energy Redevelopment (“PATER”) Study. This federally funded study assesses the potential for redevelopment of retired electric generation facility sites, together with the need for transmission upgrades to support increased resource adequacy in Pennsylvania.

Duquesne Light Company (“Duquesne Light” or “Company”) is a public utility as the term is defined under Section 102 of the Public Utility Code, 66 Pa. C.S. § 102, and is certificated by the Commission to provide electric distribution service in portions of Allegheny and Beaver Counties in southwestern Pennsylvania. Duquesne Light is an electric distribution company (“EDC”) and provides electric service to approximately 605,000 customers in and around the City of Pittsburgh. The Company operates both distribution and transmission facilities. Duquesne Light hereby offers these comments for the Commission’s consideration.

II. COMMENTS

Duquesne Light supports this effort to evaluate how retired generation sites may be redeveloped to advance resource adequacy and economic development. The Study is particularly

timely in the context of rapid load growth, expansion of the data center industry, and retirement of generation resources in the PJM market.

The Company prioritizes safety, reliability, and affordability for its customers. The PATER Study contributes to these goals by producing a coordinated assessment of former generation sites to help identify practical opportunities, clarify development needs, and focus public and private resources where they can produce the greatest benefit. The outcome of this work can be a framework for considering the relationship among available generation, transmission capability, site readiness, and the needs of new large electric loads. Duquesne Light finds value in the first phase of this work and offers the following comments to inform subsequent phases of the study.

a. Generation availability, not transmission capability, is the principal constraint.

The Study's central finding is encouraging: under the modeled network conditions, Pennsylvania's transmission system can accommodate more than nine gigawatts (GW) of additional demand. This suggests the existing transmission system is not the principal barrier to adding substantial new load. Instead, it shows that the more immediate challenge is ensuring that sufficient generation resources are available to serve that load reliably.

Transmission planning and modernization remain essential to reliability and to the efficient movement of power. Nevertheless, the Study supports a balanced conclusion: broad economic-development opportunities should not be characterized as principally constrained by a lack of transmission capability when the modeled transmission network can accommodate materially more demand than the available generation fleet can reliably serve. Efforts to attract new large loads will be most successful when paired with policies that facilitate adequate generation supply, preserve reliability, and provide developers with transparent information regarding the availability and timing of energy resources.

It is also important to note that while the studied sites were configured for generation, redevelopment of the same sites for generation may still require transmission upgrades in order to interconnect generation safely and reliably. Each project must consider the generation configuration in concert with the remainder of the grid, as the needs of today may not match the builds from decades in the past. The cost of upgrades for these sites may often be less than transmission upgrade costs for an undeveloped site due to the presence of existing infrastructure and previous design considerations thereby reducing upgrade costs ultimately paid by consumers. However, this may not always be the case.

b. Transmission modernization can complement generation development.

The Study also appropriately recognizes the role of advanced transmission technologies—technologies that improve power-flow control and the utilization of existing infrastructure, helping to address constraints and support reliability. Duquesne Light appreciates the Study’s recognition of Pennsylvania utilities participating in regional modernization initiatives.

These tools should be viewed as complementary to, rather than substitutes for, an adequate generation fleet. Targeted transmission solutions can improve the performance and flexibility of the network but they cannot by themselves supply the energy and capacity needed to serve sustained growth in large-load demand.

c. Clarification and opportunities

At the October 7, 2026 Technical Conference, representatives of the project team requested input on areas for clarification or additional analysis. Without detracting from the value of the initial phase of the Study, Duquesne Light respectfully recommends the following areas for clarification or additional analysis, to improve the transparency and usefulness of the Study.

- **Power-flow model vintage.** The Study identifies a “PJM 2025 Summer Peak RTEP planning case.” Duquesne Light recommends providing additional detail on whether the PJM Regional Transmission Expansion Project (“RTEP”) used is from the RTEP series produced in 2025, or if is modeled using 2025 calendar year data. Identifying the specific case and study year would make the results easier to interpret and reproduce.

- **Contingency selection.** The Study states that 2,548 contingencies were evaluated. The Company recommends including additional detail regarding the criteria used to develop the contingency set, along with the categories and geographic scope of the contingencies included. Doing so would provide useful context for the results.

- **Mapping of candidate sites.** The Study mapped 21 candidate locations to the nearest substation in the power-flow model and, where applicable, to both higher- and lower-voltage facilities. Duquesne Light questions if transmission owners were involved in validating the selected points of interconnection and reviewing the mapping for geographic and electrical accuracy. If not, it is recommended that such activity be included in the next phase of the study, as transmission owners maintain detailed local system information.

- **Potential overlap with planned projects.** The report notes that candidate sites include those that “possibly” or “most likely” overlap with projects in PJM’s Cycle 01. Additionally, two of the Study’s candidate sites are located within Duquesne Light’s service territory, with two others immediately outside it. The Company is aware of potential reuse plans for these sites. It is critical that the second phase of the study identify and account for any planned redevelopment in the works throughout the PJM footprint. Continued coordination with affected utilities, site owners, PJM, and economic-development stakeholders, including municipalities, will be important as particular opportunities advance.

d. Study results should inform state investment priorities.

Duquesne Light supports the intent expressed at the October Technical Conference that the outcome of this endeavor should not become “a study on a shelf,” but rather an actionable

document that guides investment and development in the state. In this next phase of the study, it may be valuable to add more detail on what that looks like, as well as the expected involvement of transmission owners and electric distribution companies (“EDCs”). Duquesne Light seeks to be a partner to entities like the Department of Community and Economic Development (“DCED”), as well as county and local economic development agencies, to the extent redevelopment benefits its customers. In this next phase of the study, Duquesne Light would find value in better understanding what that partnership looks like, as well as any potential limitations.

III. CONCLUSION

In closing, the Company reiterates its focus on safety, reliability and affordability in the context of increasing load growth. Duquesne Light commends the Commission, Team PA and other project partners for undertaking the PATER Study. The results will provide a constructive foundation for evaluating the redevelopment of retired generation sites and for supporting new economic development, where it is most beneficial. The Company appreciates the opportunity to provide these comments.

Respectfully submitted,



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