



PJM Designated Entity Status  
Pre-Qualification Package

Submitted September 26, 2023

## Prequalification Package Requirements

**1. Name and address of the entity including a point of contact.**

Duquesne Light Company  
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**2. Technical and engineering qualifications of the entity or its affiliate, partner, or parent company.**

For more than a century, Duquesne Light Company has been a provider of reliable transmission and distribution service to over half a million customers in western Pennsylvania.

The company that is now a subsidiary of Duquesne Light Holdings, Inc. (“DL Holdings”) was founded as one of the first electric companies in the United States in 1880 under the name Allegheny County Light Company (“ACLC”). In 1898, the Philadelphia Company acquired ACLC, and in 1912, it merged with other subsidiaries of the company to become Duquesne Light Company (“Duquesne Light”). In 1935, Duquesne Light became a separate utility due to restrictions in ownership under the Public Utility Holding Company Act. In 1989, the company was restructured, and Duquesne Light became a subsidiary of DL Holdings. In 1996, deregulation laws went into effect in Pennsylvania requiring energy companies to separate power generation and power transmission business units. By 2000, the company had divested of all of its generation assets. In 2007, DL Holdings became a wholly owned subsidiary of DQE Holdings, LLC, when the company was acquired by a consortium of private equity investors. The consortium consists of several institutional investors which own all the common equity of Duquesne Light’s parent company, DQE Holdings, LLC.

DL Holdings has both regulated and unregulated subsidiaries. Its primary subsidiary is Duquesne Light, a regulated utility operating an 817-square-mile area in southwestern Pennsylvania that includes the majority of Beaver and Allegheny Counties. Duquesne Light provides electric transmission and distribution services to approximately 611,000 customers, approximately 90 percent of which are residential. Duquesne Light serves as the Provider of Last Resort for customers who do not choose a non-regulated supplier of electricity. Duquesne Light’s transmission and distribution system is comprised of over 678 circuit miles of overhead and underground transmission lines ranging from 69 kV to 345 kV, over 7,200 circuit miles of overhead and underground distribution lines of 23 kV or less, and over 375 transmission and distribution substations, including customer-owned substations.

Duquesne Light has considerable technical and utility industry expertise within the following departments: Transmission Planning, Distribution Planning, Protection Engineering, Substation Engineering, Civil & Line Engineering, Project & Process Management, Asset Management, Transmission & Distribution Construction & Maintenance, Substations Construction & Maintenance, and Operations Center. Additionally, Duquesne Light has comprehensive Safety, Health, and Environmental Workforce Development departments, a robust Operations Services area, which includes Property, Materials, and Transportation Services. Importantly, Duquesne Light has a well-designed and documented Compliance program, which includes a Corporate Compliance group with oversight of compliance with the NERC Reliability Standards assigned directly to Duquesne Light as a registered entity or through the PJM TO/TOP matrix.

**3. Demonstrated experience of the entity or its affiliate, partner, or parent company to develop, construct, maintain and operate transmission facilities. Including a list or other evidence of transmission facilities previously developed regarding construction, maintenance, or operation of transmission facilities both inside and outside of the PJM Region.**

As stated in item (2) above, Duquesne Light provides electric transmission and distribution services to approximately 611,000 customers. Duquesne Light plans, constructs, owns, operates, and maintains over 678 circuit miles of overhead and underground transmission lines, specifically, 16 miles of 69 kV, 509 miles of 138 kV, and 153 miles of 345 kV in addition to 71 transmission substations. Duquesne Light also owns, operates, and maintains thirteen (13) 345/138 kV autotransformers and six (6) 138/69 kV autotransformers (the latter number has been significantly reduced in recent years due to Duquesne Light’s efforts to eliminate 69 kV as a transmission voltage).

Since joining PJM on January 1, 2005, Duquesne Light has completed over 144 transmission projects, not including transmission maintenance activities. Of these, 87 were PJM Baseline projects, 55 were Supplemental or Transmission Owner Initiated, and two (2) were Network Upgrades. Duquesne Light owns, operates, and maintains these transmission facilities.

Table 1: PJM RTEP Transmission Projects for Duquesne Light

<b>Upgrade Id</b>	<b>Description</b>	<b>Status Title</b>
b0253	Convert Pine Creek substation from 69kV to 138kV	In Service
b0254	Convert North substation from 69kV to 138kV	In Service
b0255	Convert Highland substation from 69kV to 138kV and Lines to Logans Ferry to 138kV	In Service
b0256.1	Convert Valley substation from 69kV to 138kV	In Service
b0256.2	Reconductor Valley-Crescent at 138kV (Z-82)	In Service
b0257.1	Convert Wilmerding substation from 69kV to 138kV	In Service
b0257.2	Convert Dravosburg-Wilmerding from 69kV to 138kV	In Service
b0258	Elrama replace 41 MVA 138/69kV transformer with a minimum 75 MVA	In Service
b0493	Reconductor both Cheswick - Logan's Ferry 138 kV circuits	In Service
b0501	Convert Forbes substation to 138 kV supply	In Service
b0502	New Underground Carson - Brunot Island 345 kV circuit	In Service
b0502.1	Replace Dravosburg 138kV breaker 'Z79 Illinois'	In Service

<b>Upgrade Id</b>	<b>Description</b>	<b>Status Title</b>
b0502.3	Replace Dravosburg 138kV breaker 'Z73 West Mifflin'	In Service
b0502.4	Replace Dravosburg 138kV breaker 'Z70 Elwyn'	In Service
b0503	Recable & loop existing Carson - Oakland 138 kV into Forbes 138 kV substation	In Service
b0929	Replace Universal 138 kV breaker 'Z-152'	In Service
b0930	Replace Universal 138 kV breaker 'Z-154' / 'Z-78'	In Service
b0931	Replace Universal 138 kV breaker 'NO 1-3'	In Service
b0932	Replace Brunot Island 138 kV breaker 'GEN2 69 XFMR'	In Service
b0933	Replace Dravosburg 138 kV breaker 'Z-91'	In Service
b0934	Replace Dravosburg 138 kV breaker 'Z-87'	In Service
b0935	Replace Dravosburg 138 kV breaker 'Z-76'	In Service
b0936	Replace Dravosburg 138 kV breaker 'Z-77'	In Service
b0937	Replace Dravosburg 138 kV breaker 'Z-74'	In Service
b0940	Replace Cheswick 138 kV breaker '2a/2B CAP'	In Service
b1022.13	Upgrade relaying at Elrama and Woodville to accommodate reconfiguration of 138 kV lines	In Service
b1022.14	Incorporate reconfigured 138 kV line into DL SONET ring	In Service
b1022.2	Reconductor both Collier - Woodville 138 kV lines	In Service
b1080	Restudy rating of Arsenal – Highland 138 kV underground line	In Service
b1081	Install 138kV reactors on BI – Forbes to prevent line overload	In Service
b1117	Replace Beaver Valley 138 kV breaker '1A & 3A SS tfmr' with 63 kA rated breaker	In Service
b1118	Replace Beaver Valley 138 kV breaker '1B & 3B SS tfmr' with 63 kA rated breaker	In Service
b1119	Replace Beaver Valley 138 kV breaker '2B SS tfmr'	In Service
b1120	Replace Beaver Valley 138kV breaker 'Z30 Midland' with 63kA rated breaker	In Service
b1121	Beaver Valley 138kV breaker 'Z33 J&L Midland' change reclosing time from 10 to 15 seconds	In Service
b1122	Replace Elwyn 138kV breaker 'Z62 Collier'	In Service
b1123	Replace Elwyn 138kV breaker 'No.1-2 138kV bus'	In Service
b1124	Replace Elwyn 138kV breaker 'No.2-3 138kV bus'	In Service
b1174	Create a second Collier-Elwyn 138kV circuit (Z-162) by utilizing both sets of bifurcated conductors on the existing Collier-Elwyn (Z-62) 138kV circuit	In Service
b1260	Replace Beaver Valley 138kV breaker 'Z33 J&L Midland'	In Service
b1343	Replace Collier 138 kV breaker '2-3 Bus Tie'	In Service
b1605	Replace Crescent 138 kV breaker 'Z143 #1'	In Service
b1645	Revise the reclosing of Beaver Valley 138kV breaker 'Z-29 Crescent'	In Service
b1646	Revise the reclosing of Beaver Valley 138kV breaker 'Z-37 Raccoon'	In Service
b1968	Establish operating procedure such that breaker 89, connecting Cheswick-Logans Ferry Z-53 to the No. 3 138 kV bus at Cheswick Substation is normally open	In Service

<b>Upgrade Id</b>	<b>Description</b>	<b>Status Title</b>
b1969	Install a third 345-138 kV autotransformer at Collier Substation. Currently s0321 and will be converted to baseline.	In Service
b1985	Reconductor a portion of the Mitchell-Wilson 138kV line	In Service
b2174.1	Convert the Wilson 69kV substation to 138kV	In Service
b2174.2	Extend the Elrama-Mitchell 138kV circuit to Wilson substation by converting the 69kV lines between Elrama and Wilson to 138kV	In Service
b2174.3	Convert the 69kV lines between Dravosburg and Wilson to 138kV and create a new Dravosburg-Wilson 138kV circuit	In Service
b2174.4	Combine the Bethel Park-Elrama and Elrama-West Mifflin 138kV circuits and loop through the Wilson 138kV substation creating a Bethel Park-Wilson 138kV circuit and a West Mifflin-Wilson 138kV circuit	In Service
b2174.5	Combine the Piney Fork-Elrama and Elrama-Clairton 138kV circuits to create a Piney Fork-Clairton 138kV circuit	In Service
b2174.6	Bifurcate the Dravosburg-West Mifflin 138kV circuit utilizing the conductors of the Elrama-Dravosburg 69kV circuit	In Service
b2174.7	Retire the Elrama 138/69kV substation and the Elrama-Dravosburg 138kV circuit	In Service
b2175	Perform a High Voltage Study to determine the optimal configuration of the shunt reactors or another reactive compensation solution	In Service
b2175.1	200 MVAR shunt reactor at Brunot Island 345 kV	In Service
b2175.2	200 MVAR shunt reactor on future Brunot Island – Carson 345 kV circuit	In Service
b2198	Revise the reclosing for the Brunot Island 138 kV breaker 'Z-40 COLLIER'	In Service
b2199	Revise the reclosing for the Brunot Island 138 kV breaker 'Z-41 COLLIER'	In Service
b2200	Revise the reclosing for the Crescent 138 kV breaker 'Z-29 Beaver'	In Service
b2201	Revise the reclosing for the Crescent 138 kV breaker 'Z-82 VALLEY'	In Service
b2202	Revise the reclosing for the Crescent 138 kV breaker 'Z-21 NORTH'	In Service
b2203	Revise the reclosing for the Elrama 138 kV breaker 'Z18-USX CLAI'	In Service
b2204	Revise the reclosing for the Elrama 138 kV breaker 'Z13-WEST MIF'	In Service
b2205	Revise the reclosing for the Elrama 138 kV breaker 'Z15-DRAVOSBU'	In Service
b2206	Revise the reclosing for the Woodville 138 kV breaker 'Z-106 PINEY'	In Service
b2207	Revise the reclosing for the Woodville 138 kV breaker 'Z-64 COLLIER'	In Service
b2208	Revise the reclosing for the Beaver Valley 138 kV breaker 'Z-28 CRESCEN'	In Service
b2209	Revise the reclosing for the Cheswick 138 kV breaker Z-51 WILMERD'	In Service
b2280	Replace the USAP 138kV breaker 'XFMR'	In Service
b2303	Revise the reclosing to the Dravosburg 138kV breaker 'Z73 West Mifflin' from 5 sec to 15 sec.	In Service
b2563	Operate with the Crescent 345/138 kV #3 autotransformer in-service by replacing 8 overdutied 138 kV breakers at Crescent, 3 138 kV breakers at Beaver Valley with 63 kA rated breakers; install #1 section	In Service
b2632	Replace the Oakland 138 kV 'Z-101 Arsenal' breaker	In Service
b2639	Replace the Crescent 138kV 'NO3 - 4 138' breaker with a 63kA breaker	In Service
b2640	Replace the Crescent 138kV 'Z143 SWCKLY' breaker with a 63kA breaker	In Service

Upgrade Id	Description	Status Title
b2641	Replace the Crescent 138kV 'Z-24 MONTOUR' breaker with a 63kA breaker	In Service
b2642	Replace the Crescent 138kV 'Z-28 BEAVER' breaker with a 63kA breaker	In Service
b2689.1	Reconductor approximately 7 miles of the Woodville - Peters (Z-117) 138 kV circuit	In Service
b2689.2	Reconfigure West Mifflin-USS Clairton(Z-15) 138 kV circuit to establish Dravosburg-USS Clairton(Z-14) 138 kV circuit and West Mifflin-Wilson(Z-15) 138 kV circuit	In Service
b3011.7	Replace the line terminal equipment and line breaker #85 at Dravosburg 138 kV substation in the Elwyn Z-70 line position/bay, with the breaker duty as 63KA	In Service
b3011.8	Upgrade 138 kV breaker "Z-78 Logans" at Dravosburg.	In Service
b3015.2	Reconductor Elrama to Wilson 138 kV line. 4.8 miles	In Service
b3064.2	Replace the West Mifflin 138 kV breakers "Z-94", "Z-74", "Z14", and "Z-13" with 63 kA breakers	In Service
b3084	Reconductor the Oakland - Panther Hollow 138 kV line (~1 mile)	In Service
b3212	The Crescent 138 kV oil-type breaker "2-5 TIE" is found to be over duty following a model review and correction to short circuit base case.	In Service
b3217	Reconductor Wilson to Mitchell 138 kV line - DL portion. 4.2 miles total. 2x795 ACSS/TW 20/7	In Service
b3265	Implement slow circulation on existing underground 138 kV high pressure fluid filled (HPFF) cable between Arsenal and Riazzi substations.	Engineering & Procurement
b3319	Add forced cooling to increase the normal rating of the Brunot Island-Carson (302) 345 kV High Pressure Fluid Filled (HPFF) underground cable circuit	Engineering & Procurement
b3340	Replace one (1) Cheswick 138 kV breaker with a 3000 A, 63 kA breaker: "Z-53 LF_3".	In Service
b3717.2	Transmission Line Rearrangement: <ul style="list-style-type: none"> <li>Replacement of four structures and reconductor Duquesne Light portion of Plum-Springdale 138 kV line.</li> <li>Associated communication and relay setting changes at Plum and Cheswick.</li> </ul>	Engineering & Procurement
n2085	Woodville - Install 42.31 MVAR capacitors in substation from the MVAR deficiency at Bever Valley	In Service
n4322	Beaver Valley substation—replace the Crescent 138kV (Z-29) breaker with a 3000A, 63kA breaker. Replace the primary protection as the Crescent and Racoon substation to coordinate with the protection s	In Service
s0168	Install a third 345/138 kV autotransformer at Crescent but the normal running order will be out of service to provide a hot spare	In Service
s0175	Replace Elwyn 138kV breaker 'Z70 Dravosburg '	In Service
s0176	Connect the Brentwood substation tap to both sets of bifurcated conductors on the Dravosburg Elwyn (Z-70) 138kV circuit	In Service
s0221	Replace the Clinton substation 345 kV breaker drops on the Beaver Valley - Clinton and the Collier - Clinton 345 kV	In Service
s0222	Replace the Elrama - Mitchell 138 kV breaker and disconnect switches at the Elrama substation	In Service

<b>Upgrade Id</b>	<b>Description</b>	<b>Status Title</b>
s0302	Connect the Brentwood substation tap to both sets of bifurcated conductors on the Dravosburg Elwyn (Z-70) 138kV circuit	In Service
s0304	Expand Midland substation to a three 138kV buses with two distribution transformers	In Service
s0320	Rebuild aging double circuit 138 kV tower line between Brunot Island and Crescent substations with 138 kV tower line.	Under Construction
s0320.1	Reconfigure 138 kV circuits to create Brunot Island-Montour, Montour-Sewickley, and Crescent-Sewickley 138 kV circuits and establish new Brunot Island-Crescent 138 kV circuit	Under Construction
s0404	Reconfigure the Hopewell 69 kV substation to serve the US Gypsum customer directly from a breaker position on the Hopewell No. 1 69 kV bus	In Service
s0504.1	Replace No. 2-4 Autotransformer 345 kV breaker at Beaver Valley 345/138 kV substation with 80 kA breaker	In Service
s0504.2	Replace Crescent (318) No. 4 Bus 345 kV breaker at Beaver Valley 345/138 kV substation with 80 kA breaker	In Service
s0504.3	Replace Unit 1, No. 3 Bus 345 kV breaker at Beaver Valley 345/138 kV substation with 80 kA breaker	In Service
s0504.4	Replace Unit 2, No. 5 Bus 345 kV breaker at Beaver Valley 345/138 kV substation with 80 kA breaker	In Service
s0504.5	Replace Clinton (314) No. 3 Bus 345 kV breaker at Beaver Valley 345/138 kV substation with 80 kA breaker	In Service
s0504.6	Replace Mansfield (316) 345 kV breaker at Beaver Valley 345/138 kV substation with 80 kA breaker	In Service
s0504.7	Replace Unit 1, No. 4 Bus 345 kV breaker at Beaver Valley 345/138 kV substation with 80 kA breaker	In Service
s0504.8	Replace Unit 2, No. 6 Bus 345 kV breaker at Beaver Valley 345/138 kV substation with 80 kA breaker	In Service
s0504.9	Replace Clinton (314) No. 4 Bus 345 kV breaker at Beaver Valley 345/138 kV substation with 80 kA breaker	In Service
s0567	Replace the Collier 1-3 345kV bus tie breaker and the Collier 2-3 345kV bus tie	In Service
s0670	Reroute approximately 2.5 miles of the Valley - Raccoon (Z-81 & Z-83) 138 kV circuits and Valley - Hopewell (66161) 69 kV circuit and loop the Z-83 circuit through a new 7 bus ring substation (Potter	In Service
s0733	Brunot Island 3-10 138 kV tie Breaker replacement	In Service
s0734	Carson 3-4 138 kV tie breaker replacement	In Service
s0735	Raccoon Z-81 138 kV breaker replacement	In Service
s1083	Loop the existing Cheswick-North (Z-56) 138kV circuit into the newly constructed West Deer 138kV/23kV substation. The looped transmission sources will be re-established as Cheswick-West Deer (Z-56) and North-West Deer (Z-156). Install a four (4) breaker 138kV ring bus at the West Deer substation. The newly constructed portion of the Z-56 and Z-156 138kV transmission circuits will use 795 ACSS/TW 20/7 conductor.	Engineering & Procurement
s1226	Replace aged-oil Brunot - #3/9 138kV bus tie breaker with current standard SF6 breaker (Present rating: 63 kA, Future Rating: 63 kA).	In Service

<b>Upgrade Id</b>	<b>Description</b>	<b>Status Title</b>
s1227	Replace aged-oil Brunot - Sewickley Z43 138kV breaker with current standard SF6 breaker (Present rating: 63 kA, Future Rating: 63 kA).	In Service
s1228	Replace Beaver Valley - 2B SSST breaker 138kV (Present rating: 63 kA, Future Rating: 63 kA).	In Service
s1229	Replace aged-oil Raccoon Sub – Valley Z83 138kV breaker with current standard SF6 breaker (Present rating: 63kA, Future Rating: 50kA).	In Service
s1230	Replace aged-oil Raccoon Sub – #1/2 138kV bus tie breaker with current standard SF6 breaker (Present rating: 63kA, Future Rating: 50kA).	In Service
s1233	Replace aged-oil Cheswick SS - #88 138kV breaker at North Z-56 Bus #4 with current standard SF6 breaker (Present rating: 63kA, Future Rating: 63kA).	In Service
s1234	Replace aged-oil Collier SS – 1A transformer 138kV breaker with current standard SF6 breaker (Present rating: 50kA, Future Rating: 63kA).	In Service
s1235	Replace aged-oil Collier SS – 2A transformer 138kV breaker with current standard SF6 breaker (Present rating: 50kA, Future Rating: 63kA).	In Service
s1588	Establish a new 138-23kV substation (Panther Hollow) utilizing the existing Arsenal-Oakland (Z-101) 138kV circuit as a looped transmission source.	In Service
s1737	Retire the Wilmerding-WABCO (Z-98) 138 kV line	In Service
s1738	Build Potter - NOVA Chemical 138 kV line	In Service
s2275	Relocate 56 transmission structures and approximately 13.9 circuit miles of conductor in order to reroute the affected circuits in three (3) different areas along the Wilson to Port Perry 138 kV transmission corridor.	In Service
s2400	Replace the two existing 138 kV breakers at Cheswick SS with GE type DT-1, 145kV, 63kA Int., SF6 Breaker	In Service
s2726	Establish a new 138-23 kV Watson substation with a 138 kV 3000A GIS ring bus. New substation will provide additional distribution feeds to Duquesne Light's downtown area which will increase capacity and provide increased resiliency. The existing Oakland–Forbes (Z-48) and Carson–Forbes (Z-86) 138 kV circuits will be looped through the new Watson 138 kV Substation to act as its transmission source. Four new 138 kV circuits will be created: Oakland–Watson (Z-48), Forbes–Watson (Z-85), Forbes–Watson (Z-86), and Carson–Watson (Z-89).  The Watson substation will provide load relief, increased service reliability, and resiliency to the distribution lines which provide service to Pittsburgh's downtown area and nearby communities.	Under Construction
s2826	Replace the two Brunot Island 138/69 kV transformers.	Engineering & Procurement
TOI332	New Arsenal-Highland 138kV underground line	In Service
TOI334.1	New Arsenal-Highland 345kV underground line	In Service
TOI334.2	New Arsenal-Logans Ferry 345kV overhead line	In Service
TOI334.3	New Logans Ferry 345kV substation with 345/138kV autotransformer	In Service
TOI334.4	Replace Cheswick 138kV breaker Z58	In Service
TOI335.1	Convert Brunot Island-Arsenal Z-67 to 345kV from 138kV underground line	In Service
TOI335.2	New Arsenal 345kV substation with 345/138kV autotransformer	In Service
TOI335.3	Convert Collier-Brunot Island Z-67 to 345kV from 138kV overhead line	In Service

<b>Upgrade Id</b>	<b>Description</b>	<b>Status Title</b>
TOI336.1	Expand Brunot Island substation	In Service
TOI336.2	Re-arrange to form Crescent-Brunot Island 345kV line	In Service
TOI336.3	Re-arrange to form Brunot Island-Arsenal & Arsenal-Carson 345kV lines	In Service
TOI337.2	Convert Phillips 69kV substation to Crescent 138kV substation	In Service
TOI337.3	Expand Hopewell substation with 2-69kV lines converted to 138kV	In Service
TOI337.4	Convert Koppel Steel to 138kV & eliminate 69kV in Legionville substation	In Service
TOI337.5	Convert Ambridge substation to 138kV from 69kV	In Service
TOI339	New Sewickley 138kV substation with Crescent-Sewickley & Sewickley-(Neville)-Brunot Island line	In Service
TOI340.1	Move Plum from breaker position at Logans Ferry to Cheswick	In Service
TOI340.2	New 138kV line from Plum to Universal	In Service
TOI428	Replace Crescent 345 kV breaker #324 - Mansfield 315	In Service
TOI429	Replace Collier 345 kV breaker #315 - Clinton 324	In Service

**4. Previous record of the entity or its affiliate, partner, or parent company to adhere to standardized construction, maintenance and operating practices.**

Duquesne Light has extensive experience adhering to standardized construction, maintenance, and operating practices. Duquesne Light personnel are familiar with industry standards and incorporates them into their day-to-day planning, operations, design, construction, and related activities. Duquesne Light also encourages its personnel to pursue and obtain industry certifications such as professional engineering licensure and offers internal classes to meet licensing requirements. Transmission System Operators and Shift Supervisors are NERC and PJM certified and meet all annual training requirements to maintain their certifications.

Due to a significant increase in the focus on and dedication to safety, Duquesne Light has witnessed a dramatic improvement in safety performance and preventable motor vehicle incidents since 2014. Duquesne Light has been awarded the Safety Sustainability Award in 2020, 2021, and 2022 and the Safety Achievement Award in 2021 from the Energy Association of Pennsylvania.

This transformation can be attributed to several performance drivers, including an overall corporate safety strategic focus, leadership commitment at all levels of the organization, safety engagement in both the union and non-union workforce, increased safety communications, increased focus on field observations and check rides, creation and implementation of High Hazard Work Tasks, Safety Teams focused on continuous improvement and the kickoff of our safety culture survey and associated teams. Duquesne Light believes that the Company's improved safety metrics are reflective of a genuine culture change within the Company over the past several years—one in which the safety of our employees, contractors, and the public are each employee's number one value.

Duquesne Light's Asset Management department documents the current status of Duquesne Light's transmission and distribution assets. The Asset Management department plans for future development, maintenance, and replacement of these assets. In addition, the Asset Management department performs numerous inspections throughout the year and is responsible for remediation of any items found during these inspections.

Similarly, Duquesne Light's Vegetation Management department maintains and implements a Transmission Vegetation Management Program. This program ensures full compliance with the NERC Vegetation Management Reliability Standard FAC-003. As part of its strategy to maintain a reliable electric transmission system, Duquesne Light implements a defense-in-depth strategy to manage vegetation located on transmission rights-of-way ("ROW"), minimize encroachments from vegetation located adjacent to the ROW and report vegetation related outages of the transmission system to its respective Regional Reliability Organization and NERC.

**5. Capability of the entity or its affiliate, partner, or parent company to adhere to standardized construction, maintenance and operating practices.**

Duquesne Light's demonstrated ability to adhere to standardized construction, maintenance, and operating practices outlined in the response to item four (4) coupled with its work practices, manuals, and experienced personnel conclude that Duquesne Light is and will continue to be capable of adhering to standardized construction, maintenance, and operating practices.

**6. Financial statements of the entity or its affiliate, partner, or parent company. Please provide the most recent fiscal quarter, as well as the most recent three fiscal years, or the period of existence of the entity, if shorter, or such other evidence demonstrating an entity's current and expected financial capability acceptable to the Office of the Interconnection.**

From June 2007 to present, DL Holdings and Duquesne Light have provided financial information to accredited or institutional investors and creditors via a secure online repository hosted by Finsight, an independent third-party. DL Holdings and Duquesne Light provide the following financial information via Finsight: quarterly unaudited financial statements, audited annual financial statements and investor presentations.

In addition, Duquesne Light provides financial information to several public sources for regulatory and continuing disclosure purposes, including the following:

- Pennsylvania Public Utility Commission (PA PUC Annual Report)
- Federal Energy Regulatory Commission (FERC Form 1 Annual Report and Form 3 Quarterly Reports)

FERC Form No. 1 Filings:

2022  
2021  
2020  
2019  
2018  
2017  
2016  
2015  
2014  
2013

Duquesne Light Issuer Credit Ratings: A3/BBB+ (Moody's/Standard & Poor)

**7. Commitment by the entity to execute the Consolidated Transmission Owners Agreement, if the entity becomes a Designated Entity.**

Duquesne Light is a signatory of the Consolidated Transmission Owners Agreement.

**8. Evidence demonstrating the ability of the entity to address and timely remedy failure of facilities.**

Duquesne Light staffs a “24/7” operations center with NERC and PJM certified transmission operators to communicate with PJM, monitor the system, switch facilities in and out of service as required or directed, address any pre- and post-contingency mitigation measures, and perform system restoration efforts. All DLC’s transmission operators adhere to PER-005 training requirements to include annual training on System Restoration, Loss of Control Center Functionality, Communication Protocols, and Emergency Procedures.

Duquesne Light’s extensive System Restoration plan provides our transmission operators with guidance for restoring DLC’s system using both Top Down and Bottom-Up methods in the event of a blackout. DLC’s Field Operators are also trained on implementing our System Restoration plan. Furthermore, Duquesne Light has a fully redundant Alternate Operations Center (AOC). The functionality of both the Primary and Alternate Operations Centers, include but not limited to control, monitoring, and communications, are redundant and independent from each other per EOP-008. This capability is tested at least annually.

Duquesne Light has a skilled labor force including, but not limited to, qualified line workers, troubleshooters, relay technicians, senior operators, substation maintenance workers, riggers, telecommunications workers, underground cable splicers, cable testers, etc. These individuals are experienced, available, and trained to respond to emergencies of varying degrees. Additionally, Duquesne Light employs on a regular and ongoing basis a significant number of qualified construction and line clearance contract companies that, while conducting scheduled vegetation management work or construction and maintenance work, are fully prepared to respond immediately to small, medium, and large-scale emergencies on the system. As a result, Duquesne Light has immediate access to such services as traditional line construction contractors, helicopter inspection and damage survey, energized bare hand/hot stick services, specialty heavy construction equipment vendors, rigging/hauling contractors, and cable and termination services.

Participation in storm and restoration drills is an important component to operating and maintaining a transmission system. As of June 1, 2023, DLC received designation as a StormReady partner awarded by the National Oceanic and Atmospheric Administration (NOAA) and the National Weather Service (NWS). Duquesne Light participates in simulations and drills including internal drills, PJM simulated drills, and national drills such as GridEx and EARTHEx, as well as post-event reviews to adopt lessons learned.

Moreover, Duquesne Light maintains spare equipment, emergency transmission structures with associated hardware and conductor, and mobile distribution substation transformers to assist in timely restoration following a failure of facilities event.

Duquesne Light is an active member in the PA Region 13 Counter Terrorism Task Force, a group established in 1998 by an intergovernmental agreement between the thirteen (13) counties of Southwestern Pennsylvania and the City of Pittsburgh. Today the Task Force is recognized nationally for its ability to leverage the significant capabilities across all of Region 13 in the execution of its mission to respond to weapons of mass destruction, chemical emergencies and other man-made and natural disasters.

Duquesne Light is an active member of the PA Black Sky Committee, run by the PA PUC, PA Governor's Office of Homeland Security, and PA Emergency Management Agency; part of the Pittsburgh downtown resilience efforts sponsored by the Pittsburgh Office of Emergency Management and Homeland Security; and part of the Department of Homeland Security (DHS) Cybersecurity and Infrastructure Security Agency (CISA) sponsored Region 13 Homeland Security Utility Group.

Duquesne Light is also an active member of two Regional Mutual Assistance Groups ("RMAG"): the North Atlantic Mutual Assistance Group ("NAMAG") and the Great Lakes Mutual Assistance Group ("GLMA"). These Mutual Assistance Groups provide a forum to ensure safe, effective and coordinated mutual assistance and regional response and service restoration for customers of member utilities.

Duquesne Light maintains an active membership in the EEI Spare Transformer Equipment Program ("STEP"). STEP is a program dedicated to transformer sharing between group members in the event of deliberate, documented terrorism, as defined in the Homeland Security Act of 2002. There are two threshold events that can trigger the program: (1) destruction or long-term disabling of one or more electric transmission substations, and (2) declaration of a state of emergency by the President of the United States pursuant to the National Emergencies Act.

Duquesne Light also signed the sharing agreement to join the Regional Equipment Sharing for Transmission Outage Restoration ("RESTORE") initiative. RESTORE is a voluntary program dedicated to sharing spare transformers and other transmission equipment between participants in the event of a disaster resulting in major damage to the transmission grid as determined by the Technical and Operating Committees within the program.

Additionally, Edison Electric Institute ("EEI") honored Duquesne Light with the association's 2012 Emergency Assistance Award for its efforts to help other electric utilities restore power following Super Storm Sandy. The electric power industry's Emergency Assistance Award has been presented to EEI member electric utility companies each year since 1998. The award recognizes extraordinary efforts undertaken in restoring electric service to other utility companies that have been disrupted by severe weather conditions or other natural events. Duquesne Light, which sent more than 100 employees to the East Coast following the storm, was chosen by following EEI's international nomination process, and the award was presented during EEI's Winter CEO meeting. Duquesne Light also received an EEI Emergency Response Award in January of 2018 for its restoration efforts following Hurricane Irma. Duquesne Light continues to offer resources during mutual assistance request including releasing Contractors to Louisiana and Company employees to Eastern PA for Hurricane Ida support in 2021.

**9. Description of the experience of the entity in acquiring rights-of-way.**

Duquesne Light has extensive experience in acquiring rights-of-way. Duquesne Light currently owns and maintains rights-of-way for over 625 circuit-miles of overhead transmission. Duquesne Light has submitted and obtained state public utility commission approval for new transmission line construction and modifications to existing rights-of-way. Furthermore, Duquesne Light has sought and obtained permits for river crossings, railroad crossings, and underground construction

and follows the policies and procedures of the Pennsylvania Public Utility Commission for right-of-way acquisition, real estate practices, notice requirements, and siting approvals.