

FILE

BEFORE
THE OHIO POWER SITING BOARD

In the Matter of the Application of **Dominion East**)
Ohio Gas Company for approval of a Construction)
Notice for its Cedar Lane Farm Replacement Line) Case No. 11-4796-GA-BNR
#1157 in Green Township, Wayne County, Ohio)

MOTION FOR WAIVERS

Applicant, Dominion East Ohio Gas Company ("DEO"), pursuant to Ohio Administrative Code ("OAC") Rule 4906-05-02 (B) (1) respectfully moves the Ohio Power Siting Board ("Board"), its Executive Director or its Administrative Law Judge to waive the 22 day time period for an expedited processing to 13 days so that construction may begin immediately on rerouting a segment of Line #1157 located on Cedar Land Farm in Green Township, Wayne County for the reasons given below.

MEMORANDUM IN SUPPORT

Concurrently with this Motion, DEO has filed an application for approval of a construction notice to reroute an existing 1,600 foot portion of a 12-inch high pressure ("HP") distribution gas line, part of Line #1157, with a 12-inch 2,200 foot HP segment. The existing segment to be replaced and rerouted currently crosses diagonally across the property of one landowner who has placed its greenhouses over it. The replacement segment will be rerouted around the greenhouses on the same property and will serve the same function as the existing 12-inch pipeline segment that it replaces. In addition, DEO proposes to change the location of an existing regulator station that is located within in the greenhouse configuration. The regulator

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station will be relocated outside of the greenhouses at a location adjacent to an existing access drive south of the greenhouses.

The background to this waiver request is that this segment of the line is of 1976 vintage, the only segment of this vintage on Line #1157. There have been four leaks on this segment, the most recent being about a year ago. DEO engineers noted that the four leak clamps were fairly close together which could be indicative of more serious issues. Therefore, several months ago, DEO retained consultants to conduct a corrosion assessment which would identify anomalies on this 1,600 foot line segment. The consultants completed their assessment and submitted a report. When DEO engineers received the corrosion assessment report, they learned that widespread anomalies occurred in other places on the line segment, including some very close to the greenhouses.

The DEO engineers discussed the action to take and preliminarily concluded that they would replace the 1,600 foot segment in the same location. This action would not have been one that required Board approval as it was essentially a repair. As they were preparing for the repair/replacement, they reconsidered the decision to replace the segment with another segment in the same location because the new line segment would still be beneath the greenhouses. Best practices would be to move the line segment away from the greenhouses. Had the DEO engineers not selected what they now consider to be a much preferred solution, they would have the project underway because no Board action would have been required. When the decision was made to reroute the segment, the DEO engineers promptly began to collect the information and data necessary for the construction notice.

There is a safety reason that supports this urgent request. Should a leak develop in a corrosive area either underneath or adjacent to the greenhouses, the natural gas could be trapped

in the greenhouse structures. The trapped natural gas could present a serious safety hazard. But for the better solution of rerouting the 1,600 foot segment away from the greenhouses which is a best practice solution, DEO would now be commencing construction replace the existing segment in the same location. Thus for safety reasons, DEO believes that it is urgent for the construction on the rerouting of the pipeline segment to begin on September 1, 2011. Therefore, DEO requests a 13 day expedited approval process.

Respectfully submitted on behalf of
DOMINION EAST OHIO GAS COMPANY

A handwritten signature in cursive script, reading "Sally W. Bloomfield", is written over a horizontal line.

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