

FILE

16-253-GA-BTX

To: PUCO ContactThePUCO
Subject: PUCO CONTACT FORM: 107502
Received: 6/16/2016 12:19:28 PM
Message:
WEB ID: 107502 AT:06-16-2016 at 12:19 PM

Related Case Number: 16-0253

TYPE: Comment

NAME: Mr. Ethan Boger

CONTACT SENDER ? Yes

MAILING ADDRESS:

- 9779 Troon Ct
- Blue Ash , Ohio 45241
- USA

PHONE INFORMATION:

- Home: 513 794 0442
- Alternative: 513 720 0681
- Fax: *(no fax number provided?)*

E-MAIL: eboger@belcan.com

INDUSTRY:Gas

ACCOUNT INFORMATION:

- *(no utility company name provided?)*
- *(no account name provided?)*
- *(no service address provided?)*
- *(no service phone number provided?)*
- *(no account number provided?)*

COMMENT DESCRIPTION:

From: Ethan Boger, 9779 Troon Ct., Blue Ash, Ohio 45241 To: Mr. Warren Walker, District manager, Community and Government Relations, Duke Energy Hello Mr. Walker, Thanks for hosting yesterday's public meeting in Blue Ash regarding the subject pipeline proposal. We spoke briefly but our conversation was cut short since the meeting was about to end. This email is a follow-up. From the number of people at yesterday's meeting and from the number of letters sent to Duke and to the OPSB it is clear that the community is very concerned about the impact

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.
Technician AW Date Processed 6/17/16

PUCO

2016 JUN 17 AM 11:34

RECEIVED-2016 JUN 17

of this transmission line going through the heart of established residential/commercial areas. The concerns can be broken down into these main categories: • Direct safety issues • Economic issues related to safety • Economic issues related to land use • Environmental issues

Direct safety issues Various studies have been conducted to assess the risk related to high pressure, high capacity transmission lines. One study claims that from 1994 through 2013, there were 110 serious incidents with gas transmission, resulting in 41 fatalities, 195 injuries, and \$450 million in property damage. (http://opsweb.phmsa.dot.gov/primis_pdm/serious_inc_trend.asp) Most transmission miles are in rural areas so most serious incidents occurred far from settled areas. Considering the urban nature of the proposed pipeline, the scale factor for damage to lives and property, scaling by the existing ratio of rural to urban mileage, may be on the order of 100 (!). I.e., the projected damage over the next 20 years for urban mileage would be on the order of 4000 fatalities and \$50 billion in property damage. Duke Energy has pointed out that a new pipeline would be built and inspected to higher standards, so that the history of past failures does not accurately predict future risk. Question: by how much has the risk been reduced? Cut in half? Optimistically, • If the risk has been reduced by a factor of 10, we might project "only" 400 fatalities and \$5 billion in property damage over the next 20 years as a benchmark. Is this acceptable? • If the risk has been reduced by a factor of 100, we might project "only" 40 fatalities and \$500 million in property damage over the next 20 years as a benchmark. Is this acceptable?

Economic issues related to safety From the information presented yesterday by Duke, it is understood that the purpose of the proposed pipeline is not to serve the city of Cincinnati (i.e., the immediate area in the zone of the southern terminus), but rather, as feed for the "hub and spoke" distribution system directed at outlying areas in Cincinnati's growing metropolitan statistical area or possibly, in future for interstate transmission as part of a broad development plan. Since the purpose of this line is not to serve the city of Cincinnati, its route was chosen primarily on economic grounds. I.e., it is the most expedient way to provide gas to the MSA. Other routes could have been chosen, but would cost Duke much more to install. From the point of view of the communities affected by the proposed routes, the economic benefit to Duke should be weighed against the economic costs to the communities. Some of these costs are related to the safety issues. They include direct costs should a pipeline explosion occur and indirect costs due to loss of property values and raised insurance costs due to perceived risk. Question 1: has Duke studied its liability in the case of an explosion in a thickly settled urban area? Will this study be part of the public record? Question 2: Has Duke studied the indirect economic costs to the communities and is Duke willing to compensate the communities?

Economic issues related to land use 30-inch pipeline requires a 30 foot wide permanent easement that cannot be used for other purposes, as well as a roughly 80 foot wide easement for construction. Obviously, this impacts existing facilities as well as future planning. A good example is the intended 98 acre development at the former Blue Ash airport that is directly in the path of Route Pink. Another concern is the forging of a 30-ft wide swath of cleared land right through a densely populated urban area. Question: How does Duke intend to compensate landowners for destruction of trees and takeover of their property? Environmental issues Duke indicated that they would be managing their own lines to ensure safety and avoid environmental impact. Duke recently pled guilty to nine misdemeanor violations of the Clean Water Act following significant spillage incidents in North Carolina. They also admitted to failures at five of their power plants over several decades. I.e., Duke Energy has a history of environmental negligence. U.S. Attorney Thomas Walker was quoted saying, "Duke Energy's crimes reflect a breach of the public trust and a lack of stewardship for the natural resources belonging to all of

the citizens of North Carolina." Question: Given its history of non-compliance with safety and environmental regulations, how will Duke demonstrate Its accountability for ensuring the safety of the proposed pipeline?