

Blue Ash, OH 45242  
July 5, 2016

The Ohio Siting Board  
180 East Broad Street  
Columbus, Ohio 43215

Re: OPSB Case #16-0253-GA-BTX

Ohio Siting Board:

I am writing to express my consternation with the Duke Energy plan to install a high-pressure natural gas line in Hamilton County residential areas. I believe Duke is being disingenuous in its answers to the many questions the proposed project raises. Specifically:

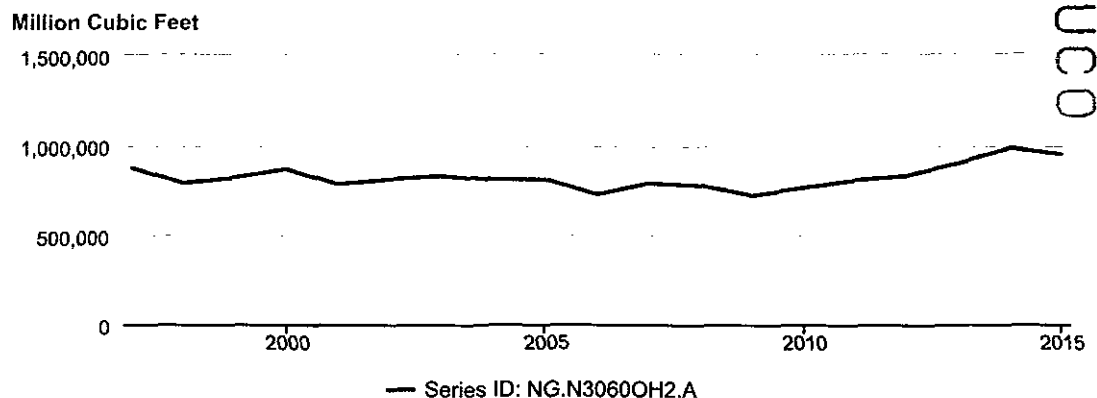
#### **"Brownouts:"**

The rationale Duke gives for this project is very short on details. In an early news article (Gas pipeline controversy erupts in Hamilton County, *Cincinnati Enquirer*, June 7, 2016) reduction or minimization of "brownouts" was cited as a reason. Of course, "brownouts" are extremely rare in this area AND refer to reducing electric supply for short times in certain areas or to reducing electric voltage. There are **no** Duke power plants that can use natural gas to make electricity at the possible terminal points for the pipeline (or within Hamilton County, for that matter). In a more recent article (Q&A: Duke pipeline plan delayed, not dead, *Cincinnati Enquirer*, June 30, 2016), Duke indicated they were referring to potential future natural gas reductions, not electricity reductions, because of increased need.

#### **Capacity:**

This makes no sense either. Natural gas delivery to Ohio consumers has been essentially constant for years, (Figure 1). Also, per capita natural gas consumption in Ohio is NOT increasing (Figure 2) and the Ohio Public Utilities Commission projects natural gas needs for all sectors except utilities and transportation to be flat over the next 15 years (Figure 3). The proposed pipeline is not intended to supply transportation or utilities (electric generation). Lastly, the population of Hamilton County has been decreasing for years (<https://development.ohio.gov/files/research/P6032>) and is projected to continue decreasing (Figure 4)! There doesn't appear to be any reason to believe there will be increased natural gas consumption in the future!

#### **Natural Gas Delivered to Consumers in Ohio (Including Vehicle Fuel), Annual**




 Source: Energy Information Administration

Figure 1. Natural gas delivery in Ohio (US Energy Information Administration, <http://www.eia.gov/dnav/ng/hist/n3060oh2a.htm>)

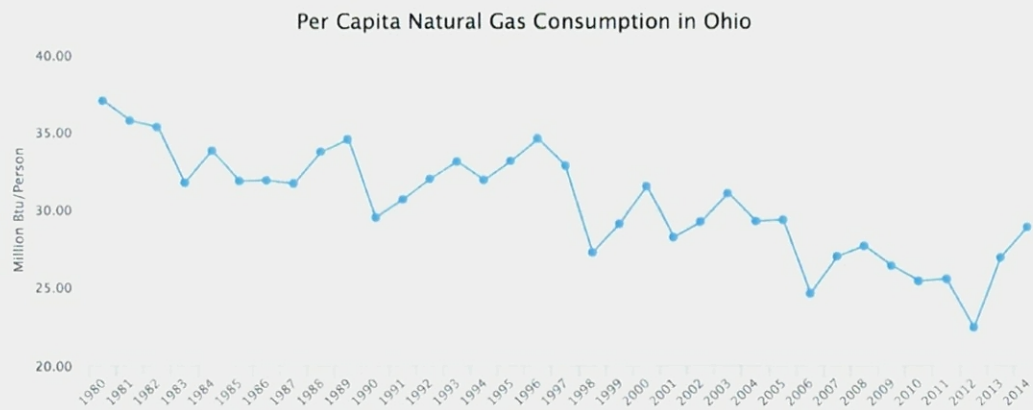


Figure 2. Natural gas consumption in Ohio (US Dept. of Energy,  
<http://apps1.eere.energy.gov/states/residential.html?state=OH#%23ng>)

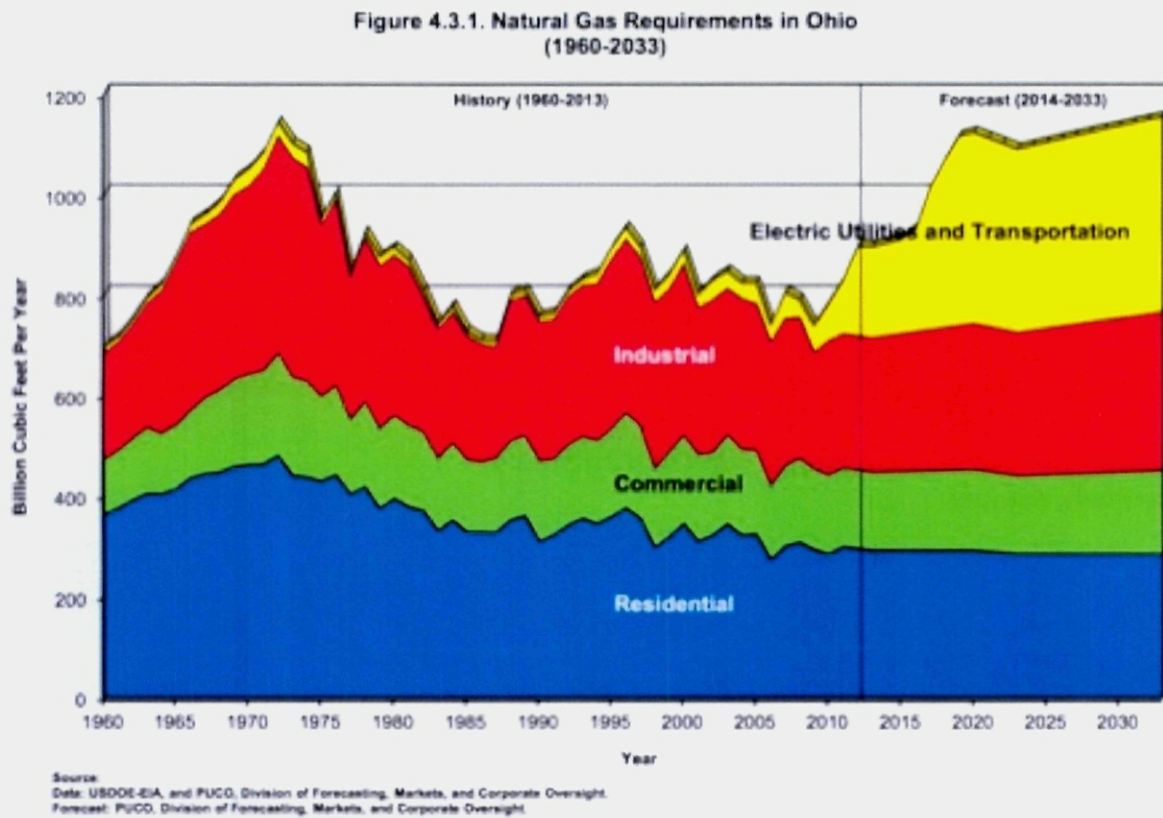


Figure 3: Natural gas requirements in Ohio, 1960–2033 (Ohio Long Term Forecast of Energy Requirements, Ohio Public Utilities Commission, July 22, 2015.)

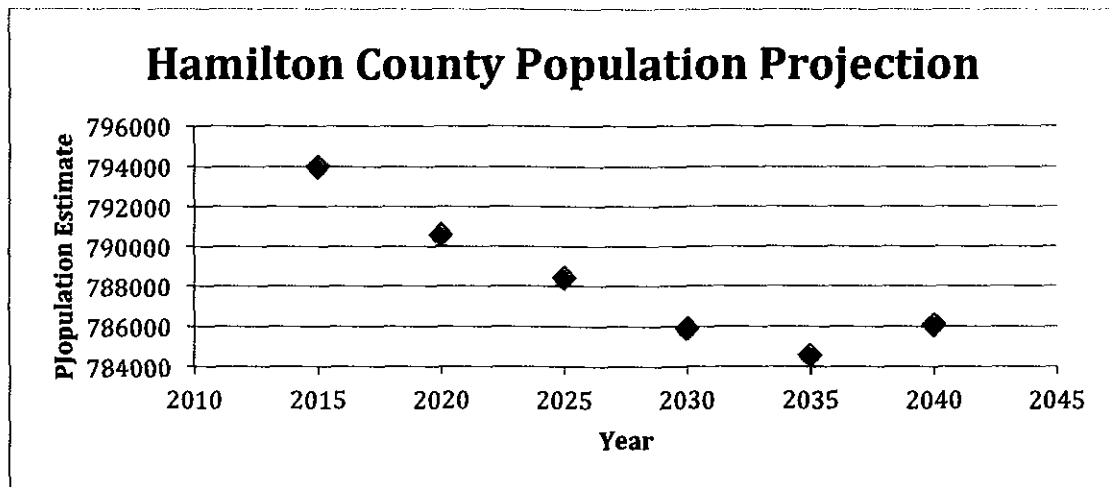


Figure 4. Hamilton County Population Projection (Plotted from data compiled by the State Demographer Research Office, Ohio Development Services Agency 77 South High Street P.O. Box 1001, Columbus, Ohio 43215)

Another reason given for this proposed project appears in the "Frequently Asked Questions" brochure Duke printed. The answer to the first question of "why is this pipeline being built?" says it is: "part of a of a larger project... to improve, protect and expand our system for current and future customers." That is the same answer I received by email from Ryan Gentil of Duke. (As shown in Figure 3, population is declining, so who are the future customers?) Duke goes on to refer to replacing ageing infrastructure and once again, "to supply growing demand for natural gas."

#### Infrastructure:

Replacing aging infrastructure is certainly a good thing for safety and reliability reasons and this is the rationale given by Duke in another Enquirer article (Duke Energy delays controversial pipeline plan, *Cincinnati Enquirer*, June 29, 2016). The problem is that no specific details are provided about which lines, how many, etc. would be replaced. In addition, the old pipes are considerably smaller and run at much lower pressures than the proposed 30-inch pipeline. How much gas is moving today in these "old" pipes compared to the amount Duke expects to move in the proposed pipeline? In my opinion, it makes more sense to replace the small gas lines with similarly sized ones? These pipelines already have right-of-way and it would entail significantly less environmental damage to replace them vs. with a 30-inch line on a completely new route. Furthermore, the damage caused by a leak or explosion of a 30-inch, 720-psig-gas line would be orders of magnitude more than from a 2-inch, low-pressure line.

The proposed routes go through highly populated areas, in proximity to schools, churches, playgrounds, etc. While the risk of an accident may be relatively low, the potential for damage and loss of life from an accident is extremely high.

**I urge you to reject running such a dangerous gas pipeline through urban and suburban areas. The potential for a catastrophe is too great.**

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