

FILE

16-253-GA-BTX

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CONTACT\_REASON: Comment

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COUNTRY: USA

COMPANY\_NAME: Duke Energy

CASE\_NUMBER: 16-0253-GA-BTX

COMMENTS: I am writing to express my deep concern regarding the high pressure 30 inch gas pipeline that Duke Energy has planned to site in densely populated areas of Hamilton County in Southwest Ohio. The planned pipeline will run through high consequence areas (HCA), including through residential properties, near schools, near a hospital and medical offices, near nursing homes, near places of worship, through the parking lot of one of the largest shopping malls in Ohio, and other locations where large numbers of people congregate. In addition to major concerns about safety, the proposal will have potentially severe negative consequences for property values, disruption of the involved cities by construction, and destruction of extensive natural amenities of neighborhoods. Continuing reports of major explosions of high pressure gas pipelines indicate that these pipelines do not belong in highly populated areas. It is not well established that adequate safeguards have been put in place to assure satisfactory surveillance and maintenance of high pressure gas lines through high consequence areas. In a report (10/31/2013) by Rick Kowalewski to the Secretary of Transportation, entitled "Pipeline Integrity Management: An Evaluation to Help Improve PHMSA's Oversight of Performance-Based Pipeline Safety Programs", it was concluded that:

"we are not seeing clear evidence of the safety outcomes the program expected when the IM rules were published--particularly for gas transmission pipelines. On these systems, some indicators suggest that safety risk might be rising instead of declining--particularly high consequence accidents and material failures that were a special focus of the rules. Over 27 years of data, 18/20 (90%) of gas transmission incidents with >\$10 million damage occurred in eight years after IM was in effect, after adjusting for inflation. Across the gas and liquid sectors, the six highest consequence accidents on record have been since IM was put in place."

It is not apparent that the Integrity Management program in which the utility performs its own supervision of high pressure pipelines has provided justification for placement of high pressure pipelines in high consequence areas.

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