16-253-CA-NX

From: Elizabeth Rueve-Miller [mailto:elizabeth_ruevemiller@hotmail.com]

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To: Puco ContactOPSB <contactopsb@puco.ohio.gov>; CentCorridorPipeline@Duke-energy.com

Subject: Case # 16-0253-GA-BTX

Dear Duke Energy and Ohio Power Siting Board,

I am one of nearly 800 people who attended Duke's Open House regarding the Central Corridor Pipeline Project. Here is the list of questions members of NOPE! brought with us in hopes of gaining a better understanding of the pipeline. Unfortunately, we got very few answers.

Our communities are concerned. We do not believe a pipeline of this size/scale is necessary, and Duke has not provided us with adequate justification. We do not see safety as a primary input into Duke's planned routes. Nor is safety a specific criteria used by the Ohio Power Siting Board. Why is that?

Perhaps if we get answers to our questions, we will feel like the interests and needs of the communities are at the heart of this pipeline proposal, rather than profits for Duke Energy's insatiable pockets. (See attached questions.)

Thank you,

Elizabeth Rueve-Miller

Elizabeth Rueve-Miller 9288 Bluewing Terrace Blue Ash, OH 45236 513-910-4309 Neighbors Opposing Pipeline Extension

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Understanding the need

What is the need?

- How did you know there was a need for this pipeline? What data were used to determine the need? How was the need quantified? Who was involved in the analysis of this data? What are their qualifications?
- Who is this pipeline being developed for? How much gas moving through the pipelines is intended to go directly to residential customers via service lines? Business customers? Electricity generation plants?
- In materials, Duke has indicated a specific need for flexibility? What does that mean? Why is that a concern?
- In materials, Duke has indicated a specific need for reliability? What does that mean? Why is that a concern?
- Why do we need a transmission line with so much pressure if this is only for Hamilton County?
- Can you tell me about Duke's forecasting models for daily natural gas demand? How far in advance is natural gas ordered? How accurate are Duke's existing forecasting models in determining daily demand?
- Can you tell me about brown outs in our area? How often do those occur? How much gas is needed protect us from the occasional brown out?

Options for addressing the need?

- Can you tell me about each of the other transmission lines that deliver gas to our area? How big are they? How much pressure do they contain? Don't you have peak shaving facilities in place already that provide reliability/flexibility? Why aren't those sufficient? Could those be used in combination with a smaller pipeline to meet the reliability/flexibility needs? What are the plans for those?
- How could Duke meet reliability and flexibility needs with smaller, lower pressure pipelines?
 - What kinds of options exist for upgrading existing pipelines? Locating another pipeline next to an existing pipeline?
 - O What analysis was done to determine the alternative approaches were not good options? Who conducted this analysis and what are their qualifications?

Understanding the Process for Selecting Routes

- Can you tell me about the process from how you got from identifying a need to selecting the 3 specific routes that you are proposing?
 - o Who was involved in this process? What are their experience levels/credentials?
 - What safety personnel were involved in the planning, designing and selection of these routes? How were safety issues identified, quantified and weighted in the decision process?
 - Why isn't the pipeline being located in less populated areas or industrial throughways? What options for less populated options were considered as part of the decision process?
 - Can you explain why Duke would not route the pipeline through industrial corridors? What are the specific reasons for rejecting the I-71 and I-75 corridors? Is it technically feasible to locate the pipeline in these areas, even if it costs more?
 - Of the "literally thousands" of options considered by Duke, how many were rejected for scheduling/timing, cost reasons, and ease of obtaining easements?
 - o What was truly unique about the 3 routes that made them the best options?



Understanding Duke's Stakeholder Engagement Philosophy

- Why have NO stakeholders been involved in the planning and design of this system? Why isn't Duke using
 Project Management Institute Best Practices, as well as industry best practices which both dictate that
 Stakeholders must be engaged up front at Project Definition.
- If this pipeline is for the benefit of Cincinnati and Hamilton County, why haven't its citizens been given the opportunity to provide input into what is delivered and how it is delivered before Duke has narrowed down the route options to 3 unacceptable choices?
- Why weren't individuals, communities and businesses affected by the pipeline informed about the project, so
 they could have an opportunity to have input? For example, parents with children in schools along the route,
 School Districts, Daycare centers, Healthcare facilities, multi-family dwellings, apartment residents, shopping
 districts?
- What role has financial burden and waste in the municipalities played in the design and evaluation of the pipelines? What responsibility does Duke have for minimizing financial burden and waste in municipalities and how are they accomplishing this? Why hasn't Duke informed City and County Governments about their plans, so that they can evaluate financial and resource decisions in this context. Will Duke be compensating the cities for the waste that has been incurred as a result of not informing its constituents?
- Why didn't Duke identify the notices they provided to affected residents as important legal documents in any way? What is your reaction to the public concern that the notices appeared to be advertisements/junk mail, rather than important documents? Why did Duke send required legal notice to random people in City and County Government, rather than City and County Leaders?
- Why won't Duke answer specific questions that are asked by its Stakeholders?

Safety

- How has safety played a role in the decision making process to date? How have each of these issues impacted decisions to date:
 - Emergency access and evacuation routes
 - o Presence of vulnerable populations
 - o Location of hazardous materials
 - Population density
 - Financial resources
 - o Existing safety infrastructure
 - Medical facilities
- Can you tell me about the safety protocol Duke has developed for a 30", high pressure pipeline in densely
 populated areas? How is your safety protocol for this line different than your other transmission lines and
 distribution lines? What unique safety precautions have been developed specifically for pipelines that are in
 densely populated areas, inside the city gates?
- In the event of a pipeline failure, can you walk me through what happens? Who is notified at Duke? What are their qualifications? Are they involved in the monitoring of pipelines 24/7? In the event of a major failure, how much natural gas will move through the pipeline before it can be shut off? Will Duke have representatives in the field 24/7 who can shut off gas in the event that a valve is compromised? Where is the facility located for remote monitoring?
- Where are remote shut off vales located? What is the process for using them? Who is involved in the decision to use them? What are their qualifications and training?
- What specific best practices is Duke using as a model for this pipeline, in terms of location? Design? Community
 education? How have incidents like San Bruno and Salem Twp influenced Duke's specific pipeline design?
 Safety plans?



- Can you tell me about new high pressure pipelines Duke has installed? When were these installed? What is the size and pressure? Which of these pipelines were newly installed into densely populated areas?
- Based on other major pipeline failures, what emergency infrastructure and training is needed? How has Duke
 engaged with emergency and safety officials about this pipeline? Do the communities involved have adequate
 resources in place? How long does it take to get something like that designed and implemented for a 30" high
 pressure pipeline? Do our municipalities have this training?
- How will additional resources needed for training and staffing be funded? Do communities have sufficient funds to make this happen? Is this cost reflected in the \$100M price of this project? How much does this cost?
- How do the new regulations being developed by PHMSA for transmission lines in High Consequence Areas apply to this pipeline? Why is Duke building a transmission line this size in densely populated areas, when this is a known problem/issue?
- Will mercaptan (odor added to natural gas) be added? Can you tell me about the process for leak detection and repair? What is the protocol for handling consumer phone calls about leaks? Do all leaks in the pipeline have to be repaired? If not, who decides which ones get repaired and which ones don't?
- Can you tell me about 3rd party accidents and this pipeline? What would be the consequences of a 3rd party accident? What role does Duke play in preventing 3rd party accidents? Do 3rd party accidents occur, even when the precautions that you have detailed are in place? Does Duke have control over 3rd party accidents? Does Duke have any liability for 3rd party accidents?
- What are the specific health concerns that have been identified for individuals located along a transmission pipeline? What are the health effects associated with Mercaptan exposure? What is the psychological impact of being forced to reside by a safety hazard? What does the Center for Disease Control say about this?

Understanding how the Central Corridor Pipeline Fits with Duke's Overall Plans

- In the documents and presentations, Duke has indicated this project is the first of several projects being planned by Duke Energy for our area. Can you tell me about the other projects being planned?
 - o Are there other pipeline projects? How do they related to the Central Corridor Pipeline? How does the placement of the Central Corridor Pipeline influence where other pipelines will be located?
 - Why isn't a holistic picture of what is being planned being shared and discussed with the community leaders and citizens? If these pipelines are interrelated, shouldn't this be approached in a holistic manner?
 - How does this project relate to existing or planned electricity generating power plants? Are there plans for connecting this pipeline to new or existing electricity generation stations? Is Duke considering building or expanding electricity generation plants or capabilities within Hamilton County?
 - What is the relationship of this project to the Miami Fort Power plant, the Lebanon Compressor Station the Harrison Compressor Station?
- Where can natural gas go, once it enters the City Gates? What happens if more natural gas comes in than is needed? Is it possible to move natural gas outside of the State of Ohio? Are current transmission lines under the Ohio River bi-directional or can they be converted to bi-directional?
- What is the rationale for the starting and ending points and the size of the pipeline?
 - What is the maximum capacity per year that can be transmitted through this pipeline? How much natural gas is currently transmitted to the stations in Norwood and Fairfax?
 - Why is the gas in this pipeline being routed to Fairfax/Norwood? What happens when it gets there? How is the "V" line in Fairfax/Norwood currently getting gas?
 - Where is gas through this pipeline stored and in what form? How much storage capacity is available?
 What will happen with excess capacity that cannot be stored?



Development & Oversight

- Can you tell me about site preparation?
 - o Who is responsible for preparing the sites? How are they chosen? What credentials and experience are required? Who from Duke is responsible for monitoring their work? How will they be doing that? What specific credential/experience are required for someone in this role?
 - What are the criteria for deciding how wide the clearing area must be? When is that decided? Who makes that decision? How is that communicated to individuals, businesses and municipalities?
 - o What are the different options used to clear land and dig trenches? Who decides which options are used? Will there be any kind of explosives used to clear land or dig trenches. If so how will that be decided and managed?
 - O What are the steps that are taken to protect wetlands, watersheds and aquifers during and after construction? How do the procedures you will use differ from FERC's Wetland and Waterbody Construction and Mitigation?
 - What are the steps that are taken to protect natural erosion systems during and after construction?
 How do the procedures you will use differ from FERC's Erosion Control, Revegetation and Right of Way process?
- Can you tell me about the actual installment of the pipeline?
 - What are the qualifications of welders being used to build the pipeline? Will Industry Recognized
 Certified Welders be used to build the line?
 - Will Duke use the protocol developed in Training Guidance for Construction Workers and Inspectors for Welding and Coating, and Best Practices for in Field Applied Coatings developed by INGAA Foundation?
- What testing is done before natural gas is actually allowed to move through the system? What specific best
 practices or regulations does Duke use to determine which tests are run. Who decides whether the pipeline
 passes inspection? What are their qualifications?

Funding

- How much does this pipeline cost? How is this project being funded and over what time period? How much of
 the costs are the project will be recovered through increases in utility rates? What expenses associated with this
 project will be funded directly by Duke, and only Duke? What is the amount of this?
- Tell me about tax abatement or subsidies associated with this project? Does Duke received specific tax abatements? Subsidies? Write-offs? What is the value of these?
- What specific grants or other government funds are being used to pay for any aspect of the project and what is the value of those?
- What investments is Duke making in Hamilton County for moving to renewable power? How does this project
 fit with renewable energy programs? Why are you investing so much in a permanent infrastructure that is not
 sustainable?
- In the event of a pipeline failure, how will expenses be covered? What specifically is covered by Duke's insurance? What are expenses that are not covered by Duke's insurance? What are situations where pipeline failure or accidents would not be covered by Duke's insurance?
- What are implications for local municipalities in terms of insurance cost and coverage when a natural gas transmission line is installed in densely populated areas?