

FILE

16-253-GA-BTX

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Butler, Matthew

From: Ronna Lucas <info@nopecincy.org>
Sent: Sunday, September 25, 2016 3:22 PM
To: Puco ContactOPSB
Subject: Oppose the Central Corridor Pipeline Extension Project

2016 SEP 26 AM 9:41
PUCO

Dear Ohio Power Siting Board,

As a resident of Blue Ash and concerned citizen, I am writing you to register my opposition to Central Corridor Pipeline Extension Project (Reference No. 16-253- GA-BTX).

RE: Case No. 16-253-GA-BTX

Dear Government Representatives:

By now you are aware that Duke Energy (?Duke?) is proposing to install a 12 mile long 20? natural gas transmission pipeline through large portions of densely populated communities in central Hamilton County. The project, called the ?Central Corridor Pipeline? is capable of transporting up to 500 PSI of compressed natural gas daily. See Duke?s Application wherein it stated that this line has a MAOP of 500PSI and it plans to operate up to that pressure. This design is allegedly an improved version of Duke?s original proposal ? a 12 mile long 30? 720 PSI transmission pipeline. However, the new proposed design, just as the old proposal, is objectionably and presents unnecessary risks for the communities involved.

Not only is the need for a transmission line of this magnitude questioned, Duke?s public handling of this matter is problematic and insulting to the people who reside in the affected areas.

Duke has indicated that it has ?heard? the public outcry to the original design and as a result modified its project by 1/3 to show that it has listened to the public. But has it really listened? Or is it merely modifying a project in a way that allows it to obtain the exact same dubious goal? That issue will be further examined below.

First, it is my understanding that the OPSB does not consider safety factors in its evaluation of an application and does not consider safety to be an issue, but that instead the issue of ?need? is a primary concern. This is truly unfortunate. But that being the case, I will instead raise "need" questions. Communities and residents of Hamilton County need to be safe in their homes, schools, hospital, places of worship, etc. These large transmission lines present inherent risks ? risks of third party incidents in striking the lines, risks of welds failing, risks of leaks, etc. These risks could be mitigated by removing the line from high sensitive facilities.

Sadly, Ohio, unlike many other states, does not have any setback regulations which dictate how far a transmission line may come from a home, school, church, etc., and according to Duke this line may ?be only a few inches from [ones] foundation.? However, while there are no formal setback regulations, Duke continues to ignore safety recommendations from industry journals which conclude that high pressure pipelines are ?better utilized for safe zones and areas not residential.? ?Journal of Loss Prevention? Nov. 2008 vol 2(6) 589-595. But if the industry recommendations are not enough for this acting board to reject Duke?s application, let us look further at the issue of need. Transmission pipelines of this magnitude generally stop outside the city-gates and the natural gas is then distributed throughout city corridors by means of smaller, less dangerous, less pressurized lines. By doing so the potential for harm is significantly diminished. The current plan to deviate from this typically safe manner of distribution of natural gas seems unnecessary and ill-advised.

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The original pipeline allowed Duke to transport enough natural gas through a populated area to supply gas to over 2.1 million homes daily. By cutting the scope of this line by 1/3 Duke is still able to transport through highly populated areas enough natural gas to supply gas to over 1.4 million homes daily. While this may on its face seem like a compromise, Duke has also indicated in its application that it would also be seeking to upgrade/increase the pressure to its existing A-line. Thus, Duke alleged modifications are really just the same project that the communities objected to from the start.

One must closely evaluate whether Duke actually needs to provide enough natural gas daily to over 1.4 to 2.1 million homes daily through only 2 of its many natural gas lines that run through Hamilton County. Why should we only look at Hamilton County's needs when Duke provides natural gas throughout Ohio and Kentucky? This is because Duke itself has repeatedly stated throughout this process that the subject pipeline is "only serve parts of the Duke Energy Greater Cincinnati gas distribution system, supplying natural gas solely to local users." Cincinnati Enquirer Article by Carrie Blackmore Smith ? June 30, 2016.

According to Duke, it "provides natural gas services to approximately 420,000 customers" in ALL of Ohio; not just to the Hamilton County area. See Application at p.2-8. Previously at one of the public forums on either June 15, 2016 or July 27, 2016 Duke's representatives indicated that Hamilton County represents about 2/3 of Duke's overall customers. That means that there are approximately 277,200 customers in Hamilton County. According to Duke residential customers are 91% making up 50% of the overall use, with the other 9% of customers are commercial/industrial using the other 50% of its gas (8% commercial use about 29% gas and less than 1% industrial use 10% gas). See Application at p.3-1. This means that of the approximately 277,200 customers in Hamilton County, about 252,252 are residential and about 24,948 are commercial/industrial. If 252,252 residential customers use 50% of the natural gas and the other 50% is for the 9% commercial/industrial customers then Duke only needs to supply enough natural gas to our local area for approximately 500,000 residential size facilities. Again, this leaves a gaping hole in Duke's application as to why they suddenly need to add to its existing system enough gas for 1.4 to 2.1 million more residential size facilities. Remember, Duke is already supplying gas to our area and the gas is already sufficient to meet current needs, so why increase the gas supply by over three-fold for this one single line?

Where is all that extra natural gas going? According to several statements made by Chuck Whitlock, Duke's V.P., on June 15, 2016, the natural gas that is being pushed through our densely populated areas will also be going to Duke's Kentucky customers. In fact, per Mr. Whitlock, Duke considers Kentucky and Ohio to be the same "integrated system." But the densely populated communities of Hamilton County are being asked to solely bear the risks ? safety, economic, etc. ? of the entire project so that Duke can provide natural gas to its interstate customers in Kentucky and beyond. See Application p.3-1.

Duke stated that it did a twenty year evaluation of its needs and in its application it concluded without evidence that a smaller line will not meet all of the additional needs for its customers. But whose needs is Duke referring to?

Evidence has shown, and Duke has admitted on July 27, 2016, that the local gas needs remain relatively flat. See Application at p.3-5. In fact, the Ohio State Demographer Research Office data show that the population of Hamilton County is going down in the next 20 years. A July 22, 2015 report by the Staff of the Public Utilities Commission of Ohio ? Ohio Long term Forecast Energy Requirements shows that within the nearly next twenty years residential gas use for all of Ohio is decreasing, as is commercial natural gas use. See Report of July 22, 2015. The only areas of growth are the less than 1% of industrial use. Id. But the best evidence contrary to Duke's current statement that it "needs" this massive volume of additional natural gas for Ohio is Duke's own 2014 Long-Term Forecast Report that was filed with the PUCO under Case No.14-868-GA-FOR that clearly shows its overall projected total sales declining through 2024.

Next, Duke states that the pipeline project is "intended to allow for the retirement of the propane-air facilities." See Application p.2-2. These propane-air facilities allegedly provide an additional 10% of natural gas to our area on peak days (7-10 days during the year). Id. According to the calculations above that means that on about 7-10 days during the year Duke needs to supply enough natural gas to our local area for approximately 50,000 residential size facilities. With a maximum of 550,000 residential size facilities being supplied gas on peak days Duke still provides no explanation why they suddenly need to add enough gas for 1.4 to 2.1 million residential size facilities to its already existing and running

system. Again, Duke is already supplying gas to our area and the gas is already sufficient to meet current needs, so why increase the local gas supply by over three-fold for this one single line? Moreover, Duke provides no explanation why the stations cannot be up-dated or why a smaller less pressurized line would not suffice.

If we look at just how many large sized, high pressured lines are actually are in Ohio's urbanized areas, there are only two examples that can be found. One in Lorain County which is a 24" pipeline which carries about 100 PSI of natural gas and the other was in Lucas County which is also a 24" line and, by my calculations, only carries 40 PSI of compressed natural gas; neither coming close to matching the size nor operating pressure of this proposed pipeline. In fact, to my knowledge the only large size, high pressure pipeline that Duke operates near Hamilton County is its C314 line that is 24", runs at over 500 PSI. This line was installed in a non-urbanized or much less densely populated area and runs through less densely populated areas. Furthermore, then this line was approved by the OPSB the board itself questioned the need for a line so large; a line that over 13 years later Duke still only runs at less than 25% during a peak day. See Duke's Answers to Questions Commonly Asked on its webpage.

All of the above clearly demonstrates that Duke's allegations of "need" for a project of this magnitude remains to be seen and the facts may actual show to the contrary. Furthermore, Duke's request to waive any further public hearings deprives the public the right to continue demanding explanations for unanswered conclusory statements. The application as submitted by Duke includes changes from its original routes, includes changes to design, changes to potential blast zones, and new references to "balancing" the system by up-grading the existing A-line; such that the public deserves the right to continue seeking explanations and answers to understand what is being sought of them. Thus, I would ask that you deny Duke's request to waive any further hearings AND reject the application that has been submitted.

Sincerely,

Ronna S. Lucas

This pipeline will travel through densely populated areas, including my neighborhood and will pose a danger to residences, schools, businesses and houses of worship.

Unlike delivery pipelines, this pipeline will be under up to 720psi pressure and an accident or rupture could cause injuries, death and destruction of property within a radius of 1/3 mile.

I ask you to oppose this pipeline and encourage both Duke Energy and the Ohio Power Siting Board to reject this pipeline

Thank you for your consideration.

Regards,
Ronna Lucas