From:
 Bell, Terry

 To:
 Puco Docketing

 Cc:
 Butler, Matthew

 Subject:
 Duke Pipeline

Date: Thursday, October 06, 2016 4:28:43 PM

Attachments: <u>image009.png</u>

image010.png image011.png image012.png

From: webmaster@puc.state.oh.us To: PUCO ContactThePUCO

Subject: PUCO CONTACT FORM: 109352

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Related Case Number: 16-0253

TYPE: Comment

NAME: Mr. Daniel W Harmon CONTACT SENDER? Yes MAILING ADDRESS:

- (NO CITY?), Ohio (NO ZIP??)
- USA

PHONE INFORMATION:

- Home: (no home phone provided?)
- Alternative: (no alternative phone provided?)
- Fax: (no fax number provided?)

E-MAIL: ratherbelifting@gmail.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:

Thank you to the Siting Board's decision to deny Duke Energy waiver for a public hearing. To make the meeting meaningful, the Siting board should demand that Duke addresses the primary concerns identified in the opposition to the pipeline that has been published on the PUCO site. I have read the majority of the submissions. I have yet to see a single submission in support of the pipeline. My summary of opposition is as follows: 1) Benefit of the pipeline for the local community 2) Negative environmental impact 3) Long-term pipeline safety 4) Economic impact on residence value I believe that item 3 is the result of items 2 and 3. Duke needs to present the analysis they have done to date on the 4 topics above and then present them in a format such as town hall type environment where the community can make comments and ask questions and the entire community can hear Duke's response. To date, Duke has chosen to have "stations", manned by consultants and low level employees that were unable to answer detailed technical questions related to safety. Furthermore, the station

approach doesn't allow the community to hear good questions and the responses by Duke. Hamilton County has a very diverse and education population. Within this population there are subject matter experts. The community would benefit from these subject matter experts asking detailed questions and hearing a response to the questions from project experts. Beyond the public information meeting, I would like to focus on item 3, Long-term pipeline safety. Other countries (e.g. The UK) and states (e.g. TX, CA) have developed more sophisticated requirements for pipelines beyond the technical requirements for pipeline construction. The sitting board technical experts need to study the Pipeline Safety Trust at pstrust.org and adopt the best practices that have been derived from some very bad loses to property and life. Within this site is a study "A MODEL FOR SIZING HIGH CONSEQUENCE AREAS ASSOCIATED WITH NATURAL GAS PIPELINES" Prepared by: Mark J. Stephens, C-FER Technologies and sponsored by the Gas Research Institute. This study calculates the death zone of a pipeline event. Duke needs to do a companion study for the pipeline they propose through our high population density community. Based on sound technical analysis and validated by actual pipeline ruptures, the study calculates the size of the area likely to experience high consequences in the event of a credible worst-case failure event. Based on this study using Duke's proposed 20 inch pipeline operated at 400 psi, the recommendation is that no people should be located within 274 feet of the pipeline. If Duke can't assure the Siting board the pipeline won't experience the 670 interstate transmission maximum allowable operating pressure, then the exclusion zone should be 356 feet. I implore the Siting Board to put this relatively unrestrictive exclusion zone requirement on Duke for this pipeline through the high population density. Ohio should learn from other regions bad experience and not wait to vaporize people and property to come to the lessons the other Countries, States and Cities have already learned! This is sound engineering practice.

Terry S. Bell

Public Utilities Commission of Ohio Service Monitoring and Enforcement Department Chief Customer Education and Contact Division (614) 995-9087

www.PUCO.ohio.gov







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Summary: Public Comment in opposition filed on behalf of concerned consumer, Daniel W. Harmon electronically filed by Ms. Donielle M Hunter on behalf of PUCO Staff