

**BEFORE THE
OHIO POWER SITING BOARD**

In the Matter of the Application of Duke)	
Energy Ohio, Inc., for a Certificate of)	
Environmental Compatability and Public)	Case No. 16-0253-GA-BTX
Need for the C314V Central Corridor)	
Pipeline Extension Project.)	
)	

**LIST OF ISSUES OF THE CITY OF CINCINNATI AND THE BOARD OF
COUNTY COMMISSIONERS OF HAMILTON COUNTY**

Pursuant to Paragraph 19(a) of the Administrative Law Judge’s Entry on June 21, 2017, in the above-captioned case, the City of Cincinnati (“City”) and the Board of County Commissioners of Hamilton County (“County”) list the following specific concerns about which they may be interested in pursuing cross-examination of witnesses at the evidentiary hearing. The City and County reserve the right to pursue additional issues at hearing that may arise based on pre-filed expert and factual testimony of the parties and any other issues raised during cross-examination. The City and County present their list of specific concerns as follows:

1. Duke’s failure to demonstrate a technical need for the proposed C314V Central Corridor Pipeline Extension Project (“Project”);
2. The timeliness of retiring or replacing existing facilities;
3. Securing a more balanced system supply from north to south;
4. The impact that the Project and the proposed routes will have on the reliability of the distribution system;
5. The due diligence performed by Duke in considering and analyzing alternatives to the Project;
6. The safety and environmental impact of the Project’s construction and excavation through potentially contaminated industrial areas, including but not limited to the area surrounding the Pristine, Inc. Superfund site;

7. The failure to identify the number of, and potential impact to, residences and structures within the Potential Impact Radius of 308.6 feet from the centerline for each of the proposed routes for the Project;
8. Addressing issues and concerns related to propane intolerant customers;
9. The propane-air facilities' risk of failure and identifying effective, cost efficient mechanisms for reducing that risk;
10. The exploration of potential alternatives to the retirement of propane-air facilities;
11. The absence of any emergency response plan for the Project;
12. The Project's imposition of restrictions on future use of the pipeline right-of-way;
13. Diminishing the Project's impact on local communities, residents, and businesses;
14. Duke's failure to demonstrate that the Project will serve the public interest, convenience, and necessity;
15. The adverse environmental and ecological impact of the Project and the proposed routes;
16. The direct and indirect impact to land use caused by the Project;
17. The Project's detrimental impact on regional development;
18. The Project's adverse impact to public services in the region, including but not limited to increased traffic and congestion on public roads and highways, road closures, lane closures, and road access restrictions;
19. The Project's adverse impact on recreational activities, including the public enjoyment of and access to parks and recreation areas;
20. The aesthetically unpleasing visual impacts along the proposed routes; and
21. The construction, operation, and maintenance of the Project's impact on the health and safety of residents and local communities.

Joseph T. Deters, Prosecuting Attorney
Hamilton County, OH

/s/ James F. Lang

James F. Lang (0059668)
Steven D. Lesser (0020242)
Mark T. Keaney (0095318)
CALFEE, HALTER & GRISWOLD LLP
The Calfee Building
1405 East Sixth Street
Cleveland, OH 44114
(216) 622-8200
(216) 241-0816 (fax)
jlang@calfee.com
slesser@calfee.com
mkeaney@calfee.com

*Attorneys for the City of Cincinnati and the
Board of County Commissioners of Hamilton
County*

/s/ Roger E. Friedmann

Roger E. Friedmann (0009874)
Michael J. Friedmann (0090999)
Jay R. Wampler (0095219)
Assistant Prosecuting Attorneys
Suite 400
230 E. Ninth Street
Cincinnati, OH 45202
(513) 946-3025
(513) 946-3018 (fax)
roger.friedmann@hcpros.org
michael.friedmann@hcpros.org
jay.wampler@hcpros.org

*Attorneys for the Board of County
Commissioners of Hamilton County*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was electronically filed through the Docketing Information System of the Public Utilities Commission of Ohio (“PUCO”) on this 21st day of August, 2017. The PUCO’s e-filing system will electronically serve notice of the filing of this document on counsel for all parties.

/s/ Mark T. Keaney

One of the Attorneys for the City of Cincinnati and the Board of County Commissioners of Hamilton County

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Case No(s). 16-0253-GA-BTX

Summary: Notification List of Issues of the City of Cincinnati and the Board of County Commissioners of Hamilton County electronically filed by Mr. Mark T Keaney on behalf of City of Cincinnati and The Board of County Commissioners of Hamilton County