

FILE

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**Date:** August 21, 2017

**Client/Matter Number:** MA527/100003

**Message:** Please fax file the attached; we will forward the original document by U.S. Mail.  
Thank you.

**Case No. 16-253-GABTX**

**Pleading to be filed: CITY OF MADEIRA'S LIST OF ISSUES FOR CROSS-EXAMINATION OF WITNESSES AT THE EVIDENTIARY HEARING**

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9. How does installing the Pipeline along the preferred and/or alternate routes serve the public interest, convenience, and necessity in Madeira?
10. Will Madeira have any input in the contractors and subcontractors hired?
11. What is the impact of permanent changes to the land and landscaping in Madeira?
12. Are there any permanent impacts to structures in Madeira?
13. What is the impact to property values due to the existence of the Pipeline in Madeira?
14. How did the Applicant determine that the proposed Pipeline's preferred and alternate routes represent the minimum adverse environmental impact in Madeira?
15. What are the permanent restrictions on the future use of the Pipeline right-of-way in Madeira?
16. What is the potential size, scale, and geographic impact of an explosion or leak in Madeira?
17. What is the emergency response plan in the event of an emergency, such as a leak, explosion, or other catastrophic event, in Madeira?
18. What is the required evacuation zone in the event of a leak or other catastrophic event in Madeira?
19. What steps has the Applicant taken to coordinate its emergency response plan with the Hamilton County Sheriff's Department, Fire Department, and any Madeira institutions?
20. Will personnel from Madeira need any specialized training in order to respond under the Applicant's emergency response plan? If so, what is the nature of such training?
21. How will a leak, explosion, or other catastrophic event involving the Pipeline affect service delivery for Madeira residents?

In addition to the above issues, Madeira hereby incorporates, as if fully restated herein, and reserves the right to question any witness with respect to any and all issues addressed in any other intervening party's list of potential issues for cross-examination of witnesses and

conditions or issues raised or addressed in the staff report dated May 31, 2017 as it may be amended or supplemented from time to time.

Respectfully submitted,

MAYOR MELISA ADRIEN, CITY OF MADEIRA

/s/ Brian W. Fox

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**CERTIFICATE OF SERVICE**

I hereby certify the foregoing was fax-filed this 21st day of August, 2017, and served via email on the following :

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