

Public comment 16-0253

-----Original Message-----

From: ahullman@gmail.com [<mailto:webmaster@puc.state.oh.us>]

Sent: Friday, September 7, 2018 4:59 PM

To: Puco ContactOPSB <contactopsb@puco.ohio.gov>

Subject: OPSB-ContactUs

Submitted: Sep 7, 2018 4:59 PM

RENDER: server

RESPONSECHART: 0

CONTACT_REASON: Comment,

TITLE: Dr.

FIRST_NAME: Alan

LAST_NAME: Ullman

EMAIL: ahullman@gmail.com

PHONE_NUMBER:

ALTERNATIVE_PHONE_NUMBER:

STREET_ADDRESS1:

STREET_ADDRESS2:

CITY: Cincinnati

STATE: OH

ZIP:

COUNTY: Hamilton

COUNTRY: USA

COMPANY_NAME: Duke Energy Ohio C314V Central Corridor Pipeline Ext.

CASE_NUMBER: 16-0253-GA-BTX

COMMENTS: Mr. Matt Butler, Outreach Manager Siting, Efficiency, and Renewable Energy Division Rates and Analysis Department Public Utilities Commission of Ohio | Ohio Power Siting Board 180 East Broad Street Columbus, Ohio 43215

Dear Mr. Butler:

I am writing to urge the Ohio Power Siting Board to refuse Duke Energy's request to install a new high-volume natural gas pipeline through Hamilton County. Duke has not made the case that this pipeline is needed. The OPSB needs to revisit its recommendation and not merely accept Duke's assertions. Look at the data as I have!

As a PhD chemist, I have experience analyzing data and models. I have examined Duke Energy's application and other officially filed documents. They do not support the case of a need for additional natural gas.

Total gas sales, as reported by Duke in its official Long-Term Forecasts, have been in decline for over 10 years. This makes sense as the local population has been declining and new gas furnace installations are significantly more efficient than the ones they replace. Demographic data from the State of Ohio support the population decline and project additional decline or leveling, but not population growth.

Additionally, comparing Duke's gas projections in their Forecasts with the Actual gas sales reported in their later Forecasts, I found that Duke over-forecasts gas need significantly. In 2010, Duke over-forecast by 100%! Their "Peak Design Day" forecasts were also significantly higher than actual. Clearly, Duke's forecasting model is flawed. (In 2015, an outside auditor also found flaws in Duke's modeling. I have seen no evidence that these have been corrected.)

Another item used to support the supposed need for the pipeline is to replace the gas supplied by their two propane-air peaking plants on those rare, extremely cold days. Their statements that propane peaking is an outdated technology are disingenuous at best. Propane peaking is widely used across the country, including newly installed systems. Additionally, liquefied natural gas peaking is another widely used technology -- including by Duke Energy, whose subsidiary, Piedmont Natural Gas, is building a new 1-billion-cubic-foot LNG facility in North Carolina.

Duke also stated that its peaking plants in KY and OH are outdated, yet Duke spent millions of dollars just 5–6 years ago updating the River Road plant.

Finally, even without the propane-air peaking plants, there is more than enough gas available from the interstate system such that Duke could contract for additional gas on those extremely cold days.

I strongly urge the OPSB Staff to reconsider its recommendation. I would be happy to share my references with one of its engineers to aid that process.

Furthermore, I strongly urge the Board to decline to approve this unnecessary pipeline.

Alan Ullman, PhD
Analytical Chemist, retired
ahullman@gmail.com

Please file the attached in the public comments for 16-0253-EL-BGN. Thanks.

From: Alan Ullman [<mailto:ahullman@gmail.com>]
Sent: Friday, September 7, 2018 4:48 PM
To: Puco ContactOPSB <contactopsb@puco.ohio.gov>
Subject: Fwd: Case No. 16-0253-GA-BTX

I sent the message and attachment (below) several weeks, but I not received confirmation of it's receipt nor has my letter appeared as a Public Comment in the docket for Case No. 16-0253-GA-BTX.

Please confirm receipt.

Alan Ullman

Begin forwarded message:

From: Alan Ullman <ahullman@gmail.com>
Date: August 13, 2018 at 2:07:14 PM EDT
To: contactOPSB@puc.state.oh.us
Subject: Case No. 16-0253-GA-BTX

Please find attached a letter to the OPSB and enter it as a public comment on Case No. 16-0253-GA-BTX, Duke Energy's Central Corridor Pipeline Extension Project.

Thank you.

Alan Ullman

Blue Ash, OH

ahullman@gmail.com

Blue Ash, OH 45242
August 13, 2018

Mr. Matt Butler, Outreach Manager
Siting, Efficiency, and Renewable Energy Division
Rates and Analysis Department
Public Utilities Commission of Ohio | Ohio Power Siting Board
180 East Broad Street
Columbus, Ohio 43215

Re: Duke Energy Ohio C314V Central Corridor
Pipeline Extension Project
Case No. 16-0253-GA-BTX

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Alan Ullman, PhD
Analytical Chemist, retired
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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

9/10/2018 2:26:07 PM

in

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

Summary: Public Comment electronically filed by Docketing Staff on behalf of Docketing.