

BEFORE

THE OHIO POWER SITING BOARD

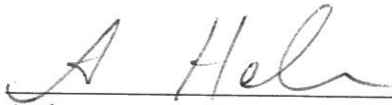
In the Matter of the Application of Duke)	
Energy Ohio, Inc., for a Certificate of)	
Environmental Compatibility and Public)	Case No. 16-253-GA-BTX
Need for the C314V Central Corridor)	
Pipeline Extension Project.)	

**RESPONSE OF CITY OF DEER PARK TO FIRST SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
FROM DUKE ENERGY OHIO**

Now comes Intervenor, Deer Park, Hamilton County, Ohio (hereinafter "Deer Park") by and through counsel, and hereby respond to the following Interrogatories and Request for Production of documents as follows:

I. GENERAL OBJECTIONS

1. Deer Park objects to Duke Energy's First Set of Interrogatories and Request for Production of Documents to the extent that they are vague and ambiguous.
2. Deer Park objects to the Duke Energy's First Set of Interrogatories and Request for Production of Documents to the extent that they seek discovery of information which is protected by the attorney/client privilege or other applicable privilege.
3. Deer Park objects to Duke Energy's First Set of Interrogatories and Request for Production of Documents to the extent that they are irrelevant, not reasonably calculated to lead to admissible evidence, and/or are overly broad and unduly burdensome.



Andrew J. Helmes (0068203)

II. INTERROGATORIES

1. Identify each person who answered or furnished information or documents, or assisted in answering or in furnishing any information or documents, used in answering any of these Interrogatories and/or Requests for Production of Documents, and identify each Interrogatory and/or Document Request for which such person participated in the response.

RESPONSE:

William A. Jetter, PhD.
Deer Park Director of Safety-Service
Work Address: 7777 Blue Ash Road, Deer Park, OH 45236

2. Identify each person whom Deer Park intends to call to testify at the hearings in the above-captioned matters. To the extent Deer Park claims that it has not made a final determination as to which witnesses it intends to call to testify on its behalf, please supplement this response as soon as such a determination is made.

RESPONSE:

Such determination has not yet been made. Deer Park intends to disclose witnesses in accordance with the Board's December 18, 2018 Order.

In the event a witness is called, anticipated witness would be:

William A. Jetter, PhD.
Deer Park Director of Safety-Service
Work Address: 7777 Blue Ash Road, Deer Park, OH 45236

Deer Park does not currently anticipate presenting testimony other than that presented by other intervening parties and reserves the right call fact or expert witnesses called by other parties.

3. For each person identified in response to Interrogatory No. 2 above, please state(1)

the subject matter upon which the witness is expected to testify; (2) the facts to which each witness is expected to testify; (3) the opinions to be rendered by each witness; (4) a summary of the witness's qualifications to provide the testimony; and (5) a summary of each witness's testimony. To the extent Deer Park claims that it has not made a final determination as to witnesses it intends to call to testify, please supplement this response as soon as such a determination is made.

RESPONSE:

1. Anticipated testimony would be the impact of the Preferred Route on Deer Park businesses and residents.
 2. Deer Park demographics; proposed pipeline routes as they travel through Deer Park; current and future Deer Park infrastructure projects that may be affected by the Pipeline; Impact of the pipeline on Deer Park business community.
 3. The detrimental effect the proposed pipeline will have on both residences and businesses in Deer Park.
 4. Mr. Jetter has served as the city's Director of Safety-Services since June 2017. He has a BS in Fire Safety (1988), a Masters Degree in Fire Safety Management (1997) and a PhD in Fire Safety (1997). Numerous years of experience in various local municipalities.
 5. Anticipated testimony would involve the impact of the pipeline on Deer Park's business and residential community.
4. Please identify each expert whom Deer Park has retained or is in the process of retaining to testify in the above-captioned proceedings. If the response indicates that a decision has not been made, please supplement the response as soon as the decision is made.

RESPONSE:

Will supplement.

Deer Park reserves the right to call any expert witnesses identified by any other party to this matter.

5. For each expert identified in response to Interrogatory No. 4 above, please state (1) the subject matter upon which the witness is expected to testify; (2) the facts to which each expert is expected to testify; (3) the opinions to be rendered by each expert; (4) a summary of the expert's qualifications to provide the testimony; and (5) a summary of each expert's testimony.

RESPONSE:

Will supplement.

6. For each witness identified in response to Interrogatory Nos. 2 or 4 above, please identify all proceedings in all jurisdictions in which the witness has offered evidence, including but not limited to, pre-filed testimony, sworn statements, and live testimony. For each response, please provide the following:

- (a) the jurisdiction in which the testimony or statement was pre-filed, offered, given, or admitted into the record;
- (b) the administrative agency and/or court in which the testimony or statement was pre-filed, offered, admitted, or given;
- (c) the date(s) the testimony or statement was pre-filed, offered, admitted, or given;
- (d) the identifying number for the case or proceeding in which the testimony or statement was pre-filed, offered, admitted, or given;

- (e) whether the witness was cross-examined; and
- (f) the custodian of the transcripts and pre-filed testimony or statements for each proceeding.

RESPONSE:

Will supplement.

7. For each expert identified in Interrogatory No. 4, above, please identify all documents provided by Deer Park to the expert. To the extent that Deer Park contends that any such documents are privileged, please provide a privilege log for same.

RESPONSE:

Will supplement.

8. Identify all documents or other evidence that Deer Park may seek to introduce as exhibits or for purposes of witness examination in any proceeding related to the above-captioned matter. To the extent that Deer Park contends that any such documents are privileged, please provide a privilege log for same.

RESPONSE:

All documents anticipated to be used by Deer Park consist of those provided by Duke Energy Ohio, Inc., in its Application in these proceedings.

9. Please state whether you agree to supplement your responses to these Interrogatories and Document Requests.

RESPONSE:

Yes.

REQUESTS FOR PRODUCTION OF DOCUMENTS

Duke Energy Ohio requests that Deer Park produce true and accurate copies of the following documents:

1. Any and all documents identified or referenced in response to any of the foregoing Interrogatories.

RESPONSE:

All documents identified or referenced are Duke Energy Ohio, Inc., documents and are already in its possession.

2. Any and all documents that contain any information used, reviewed, or referenced in preparing Deer Park's responses to any of the foregoing Interrogatories.

RESPONSE:

All documents identified or referenced are Duke Energy Ohio, Inc., documents and are already in its possession.

3. Any and all documents that Deer Park may introduce as exhibits or use for purposes of witness examination at any hearing related to the above-captioned matter.

RESPONSE:

All documents identified or referenced are Duke Energy Ohio, Inc., documents and are already in its possession.

4. Any and all documents relating to the testimony of any of Deer Park's witnesses and/or expert witnesses including, but not limited to, any and all *curricula vitae*,

reports, papers, statements, notes, other documents, and any correspondence, communications, or other documents exchanged between Deer Park and the expert.

RESPONSE:

Curricula vitae of William A. Jetter attached. Pursuant to the discovery rules, any document, reports, papers, notes or other documents are those already in possession of Duke Energy Ohio, Inc. Other documents will be supplemented.

5. Any and all contracts for services between Deer Park and any expert retained or consulted to provide opinions, testimony, evidence, or analysis in relation to the above-captioned proceedings.

RESPONSE:

Will supplement.

6. Please provide copies of any transcripts of depositions of each witness identified in Interrogatory No. 2. If a transcript is not available, please provide the name, address, and telephone number of the court reporting service used for purposes of each deposition.

RESPONSE:

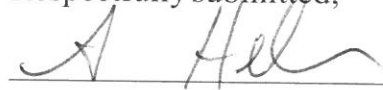
Will supplement.

7. Provide copies of any transcripts of depositions of each witness identified in Interrogatory No. 4. If a transcript is not available, please provide the name, address, and telephone number of the court reporting service used for purposes of each deposition.

RESPONSE:

Will supplement.

Respectfully submitted,

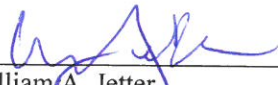
A handwritten signature in black ink, appearing to read "A. Helmes", is written over a horizontal line.

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(0068203)
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(513) 794-8866 Facsimile
Attorney for Intervenor
City of Deer Park, Ohio

VERIFICATION

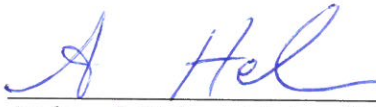
STATE OF OHIO)
) ss:
COUNTY OF HAMILTON)

I, the undersigned, William Jetter, Safety-Service Director, City of Deer Park Hamilton County, Ohio, after being duly cautioned and sworn, certify that the foregoing responses to Duke Energy's First Set of Interrogatories and Request for Production of Documents are true and accurate to the best of my knowledge and belief.



William A. Jetter

SWORN TO and SUBSCRIBED before me, a Notary Public, on this 9th day of
March, 2019.



Andrew J. Helmes, Notary Public

ANDREW JOHN HELMES, ATTY.
NOTARY PUBLIC • STATE OF OHIO
My commission has no expiration date
Section 147.03 O.R.C.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing document was served this 11th day of March, 2019, by U.S. mail, postage prepaid, or by electronic mail upon the parties listed below.

/s/ Andrew J. Helmes

Andrew J. Helmes

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'joliker@igsenergy.com';

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'Kevin.detroy@dinsmore.com';

'Kent.bucciery@gmail.com';

'glaux2001@gmail.com';

'Paula.boggsmuething@cincinnati-oh.gov'

WILLIAM A. JETTER Ph.D. FIFireE, SFPE, OFE, CFO

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(513) 891-8345
(513) 615-3768 mobile
Email:jetterbj@cinci.rr.com

SUMMARY

I am a highly motivated administrative professional with more than thirty nine years' experience. I have a vast understanding of how to manage and plan a variety of projects as well as personnel simultaneously while also maintaining my presence as an educator, leader and executive. I have demonstrated excellence in interpersonal skills and have a vast working knowledge and experience with all levels of management and professionals. I am a take charge administrator supported by knowledge, vision and a solid organizational foundation.

PROFESSIONAL EXPERIENCE

City of Deer Park

Safety Service Director

June 2017 – current

Duties are that of a City manager oversee all departments and economic development for the city. Professional Development, Human Resources, budgeting, grant writing, and addressing public policy with elected officials are also assigned to the Safety Service Director. The duties of Safety Service Director are outline in the Ohio Revised Code under statutory municipal government.

Monroe Township

Clermont County, Ohio

Fire Chief / Assistant Administrator

January 2, 2014 -June 2017

Village of Glendale-Glendale Ohio

Assistant Fire Chief of administration

May 6, 2013 - current

WAJ Consulting

December 2012-current

Strategic Community Partners

March 2015- current

Fluor Daniels Paducah Gas Diffusion Plant

August 2014 – May 2015

Private Consulting Firm specializing in Public Safety (Fire Service and EMS) delivery service modeling along with Organizational Management, Industry Safety Programs, Organization Management Development, Small to Large Business Analysis, Business Performance Review and Leadership Training.

Sycamore Township - Cincinnati, Ohio

12/18/1994- 12/31/2012

Director of EMS & Fire Service/Fire Chief

As the Chief Command Officer, I am responsible for all EMS and Fire activities for the Township. I oversee the areas of personnel, budget, operations, fire prevention services, enforcement, investigation, and emergency medical services. I serve as a member of the Township Management Team reporting to the Township Administrator and Township Trustees, with specific responsibility for directing the activities and personnel of the EMS and Fire Department. I am the Chief Command Officer at incidents and supervise numerous individuals on the emergency incident scene. On an administrative basis, I oversee the performance of all personnel and personnel evaluations for performance effectiveness. Duties also include: supervising and evaluating all EMS and Fire operations; planning EMS and Fire Department operations with respect to equipment, apparatus and personnel and supervising the effectiveness of such plans; attending regular staff meetings with the Township Trustees, Administrator and other management team members in an effort to maximize interaction and communication in the process of carrying out overall organizational objectives; fire prevention/suppression and emergency medical service operations; analyzing information as to personnel, property and operations of the division in order to improve operations and prepare budget estimates of anticipated expenditures and needs; responding to alarms and personally directing firefighting operations; investigating the source and circumstances of fires to detect their cause; direct the inspection of buildings and other properties for fire hazards; work with the State Fire Marshall and others on fire prevention and inspections; ensure department compliance with all applicable laws and standards governing the EMS and fire program and maintain sections of the Emergency Operations Manual keeping it in compliance with current standards. There were approximately 100 people under my command.

Loveland-Symmes Fire Department - Cincinnati, Ohio 1992 - 1994

Lieutenant - Director of Fire Training

1992 - 1994

I was responsible for coordination of all Fire Training activities. I developed daily programs for the enhancement of all Firefighters working on shift and worked with operations in establishing safety standards, as well as organizational standards, for the day-to-day Fire Group Operation and provided assurance that firefighters met the NFPA 100 standard in Fire Service. I also served as Safety Officer. There were forty-five (45) fire department personnel in my training group.

Lieutenant - Shift Supervisor Training Officer

1992 - 1994

I managed C shift of the Fire Department with a Jr. Lieutenant serving under my command. I was responsible for twelve (12) persons. I led and directed them in their work assignments. While still coordinating all fire training for forty-five (45) fire department personnel, I supervised them and was responsible for any projects that may have been delegated to them from operations.

City of Deer Park - Deer Park, Ohio

1978 - 1994

Assistant Chief

1992 - 1994

Coordinated and supervised all nighttime activities and training programs including Hazardous Materials Training. I shared additional personnel responsibility with another Assistant Chief. I was the Arson Investigator and Public Safety Inspector for the City and served on the Appeals Board for the City of Deer Park and on the City Emergency Operations Plan Committee. Part of my duties included directing suppression activities within the city. Thirty-five (35) people served under my command.

Captain

1989 - 1992

Responsible for all personnel. Training Officer of the department. Served as company officer. Hazardous Material Training was under my command. I served as an Inspector and Fire Ground Commander in the absence of the Chief. Additionally, I worked on several financial and equipment projects for the department.

Lieutenant

1984 - 1988

I served as Training Officer of the department and worked on several projects for the Chief. I helped to organize the fire levy for paid fire personnel and helped the City of Deer Park acquire its first aerial apparatus from the City of New York.

Firefighter/Emergency Medical Technician

1978 - 1983

Firefighter and EMT responsibilities. I served as an Engineer in addition to serving on various operations committees.

Ameriana Bank of Ohio - (formerly Deer Park Savings & Loan) Deer Park, Oh

Member - Board of Directors

1980 - 2000

I served as a member of the Board of Directors and was named Secretary in 1990. My duties included approving budgets and developing policy for senior management. In this position I was constantly aware of all lending practices and deposits. In 1980 the institution was a mutual savings and loan but in 1988 the directors took the company public. In 1993 the company was merged with Ameriana Savings & Loan in Indiana. Our shareholders' investments were more than doubled when Ameriana acquired Deer Park Saving & Loan.

Bader Inc, Hardware 1966-1990 Vice President of Sales (family owned business)
7923 Blue Ash Rd. Deer Park, Ohio (Business closed in 1994 due to father's death)
Part-time employee & Fulltime

FACULTY MEMBER

Global Interscope Solutions,
(Open Public Safety Institute) Director of Planning
Safety, Emergency management, Fire Science Curriculum, 2010- Present

University of Cincinnati College of Engineering
Adjunct Professor Emergency Management,
Fire Science programs. 2010- Present

Union Institute & University Adjunct Professor
Emergency Management/Fire Science Programs 2008-Present

Cincinnati State College **Adjunct Professor** 1999 – Present
Fire Science Program, Hazardous Materials Specialist ,NFPA Technical Rescue
Technician Program, Safety and OSHA Programs.

Great Oaks Career Center **Faculty Member** 1985 – Present
Fire Science Program, Hazardous Material Program

Ohio Fire Academy **Adjunct Faculty Member** 1989 – Present
Hazardous Material Program, Management Science

National Fire Academy **Adjunct Faculty Member** 1989 - Present
Chemistry, Hazardous Material Program, Management Science

American Public University **Adjunct Professor** 2005-2010
Fire Science Programs, Homeland Security, Emergency Management curriculum

LaSalle University **Adjunct Professor** 1997 - 2002
Fire Service Program

EDUCATION

Ohio Fire Executive Officer Program Graduated April 2006

LaSalle University

BS in Fire Safety 1988

Masters Degree Fire Safety Management, Graduated Cum Laude 1997

PhD Fire Safety, Graduated Summa Cum Laude May, 1997

Moorehead State University - Undergraduate Studies

University of Cincinnati (Fire Science Program) - Undergraduate Studies

Dale Carnegie Programs - 1977

Graduated Deer Park High School - 1973

CERTIFICATIONS:

State of Ohio Emergency Medical Technician•Professional Firefighter Certificate
FFII•State Public Safety Inspector•Certified State Public Safety
Instructor•Hazardous Material Specialist & Instructor for all levels hazardous
materials• Arson Certified State of Ohio I,• Certified Level III Homeland
Security American College of Forensic Examiner's• Ohio Fire Executive
Designation• Chief Fire Officer Designation, Commission on Professional
Credentialing 2008

ORGANIZATIONS:

Fellow, Institute of Fire Engineers USA Branch
Certified Consultant, Academy of Consulting
Consultant, Environmental Protection Agency
Academy of Management Member
Ohio Fire Chief Association member
International Association of Fire Chiefs Member since 1992
IFSTA Member since 1984
Professional Musician (Percussionist) member of Local 1 International Musician Union
National Fire Protection Association
Past President of the Institution of Fire Engineers USA-Branch
Hamilton County Local Emergency Planning Committee
Society of Fire Protection Engineers

CURRENTLY SERVE ON FOLLOWING BOARDS AND COMMITTEES

Hamilton County Local Emergency Planning Committee
Past President, Hamilton County Fire Chief's Association
University of Cincinnati Advisory Board to the Fire Science Program
Cincinnati State College Advisory Committee for Fire Service and Health Department
Deputy Commissioner and Duty Officer Hamilton County Urban Search & Rescue Team
(USAR) Retired July 1, 2015
Greater Cincinnati Hazardous Materials Board (Treasurer of Regional Board) Duty
Officer
IFSTA Curriculum Committee for Fire Brigades
Past-President, St. Peter's United Church of Christ, serving as Deacon as well
Past-President of the Institute of Fire Engineers USA Branch
Ohio Fire Executive Officer Program Oversight Committee
State of Ohio Rescue Committee Advisory
International Fire Chief Executive Leadership
Ohio Fire Chief Response Group/Southwest Ohio
Command 400 Incident Management Assistance Team Southwest Ohio
University of Cincinnati Education Research Committee
Cincinnati State College Fire Science Program Advisory Committee

Peer Review Committees Academy of Management

Academy of Management Review Team 2009-2010

Non-profit & Government Management Review Papers
Corporate Governances Programs position papers
Operational Management Program position papers

Educational Research Studies /Committees with NIST & NIOSH

University of Cincinnati College of Engineering/ College of Medicine Occupational /NIOSH.

Heat Stress Study of Fire Fighters

Monitor of Field Conditions of Fire Fighters

Smart Garment Design Team on next generation of Fire Gear.

Posture and Sway of Fire Fighters

University of Cincinnati

Ph.D. Grading Committee College of Medicine University of Cincinnati (2014- current)

Advisory Committee on EMS Degree Program 2013

Advisory Committee on a Master Certificate Program in Homeland Security and Disaster Management launch date June 2012

PUBLICATIONS

Books

Artful Ascension, Published July, 2001 Responder Books

Fire Chief Almanac, Published late 2005 Jones & Barttlet

Little Green Fire Truck, Published April, 2008, Authorhouse

Chief Fire Executive Handbook, fall, 2010 Jones & Barttlet

Fire Protection Design and Engineering, June 2013 Technical Review Editor
(Pearson Publishing)

Principles of Fire Prevention (David Diamante) Jones and Barttlet 2014,reviewer

Homeland Security Voice 2013 contributing Editor.

Articles

Leadership in Today's Fire Service Homeland Review April 2013

Change Management in Today's Emergency Service Field, Responder Magazine,
2000

A Borderless Approach to Disaster Management, Responder Magazine, 2000,

New Kids on the Block, Responder Magazine, 2000

In God We Trust, Responder Magazine, 2000

Walking Through the Minefield of Leadership, Responder Magazine, 2001

You Don't Have To Be Anal To Be a Leader, Responder Magazine, 2001

Riding Backwards, Responder Magazine, 2001

September 11, 2001, Responder Magazine, 2001

Funding the Fire Service, Responder Magazine, 2001

NIMS Today, Responder Magazine 2005

Monthly column written for responder magazine from 2000 to present

Presentations

Presented paper titled "Advancing the Response Capability" at International Conference of Fire Engineers in Nottingham, England in July, 2001
Presented paper titled "A Borderless Approach to Disaster Management" at International Fire Chief Association of Asia Conference, 2000
Presentation on Consolidation of Fire Departments at FDIC Conference, 1995
Responder Conferences in Tampa & Northern Kentucky from 2000 to present
Topics presented on Leadership & Organization Management

OTHERS

2002 Member of Who's Who of Professionals
2002 Member of International Who's Who
2002 Member of Institute of Fire Engineers (Member Status)
2002 Member of the Academy of Management
1998 Member of Who's Who in Deer Park High School

Project list completed

Organization Development

1994-1995

Employed by the Sycamore Township Board to develop the Sycamore Township EMS & Fire Department to become operational by October 1995. During this period scope of work was to develop Standard Operational Guidelines, Fleet Evaluation, Establish Human Resource guidelines, hire practices, transition existing bureau of fire life safety into fire department operations. Transitions personnel from the three private companies into Township employee's full-time and part-time status. Develop a response matrix that would provide service for the entire township.

In October 1995 transition from a private to public department now becoming Fire Chief to head the new department.

Building Projects:

1994-1995 Fire Station Erection

Scope of the Project:

Project Manager the erection and construction of new 17,000 Fire Station for Sycamore Township. This station was designed to consolidate two private fire company and one private EMS Company into one center location under the newly created Sycamore Township EMS & Fire Department. Coming into this project, the construction budget was over \$500,000.00 along with the need to reduce the second-floor site line. Also to developed response criteria centralizing emergency response providing station staffing of 10 on duty for a 24 hour period.

Fire House square footage was lessen to meet budget requirements and to achieve the residential neighborhood concerns of being overbearing in height. The savings from the

fire station reductions allow for two key improvement one was to create under pavement water storage retention area and erect a salt storage facility.

Total Project Cost \$1.5 Million Dollars.

2008-2009 New Fire Station

Relocation of an existing fire station to the larger parcel of land that includes a park/sporting complex. The new fire station needs to include a Community Room. The location would be adjacent to a new Township Sports and maintenance facility.

Scope of the project:

To develop and erect a relocation of a fire station from Solzman Road to Deerfield Road location. The project was to include a Solar Array that would outline the baseball field. The Station would become, and energy efficient facility was utilizing geothermal HAVC system. This station also had to meet from construction to finish a Leeds Certification (Gold Level). The satellite station was to meet the deployment analysis that would encompass the southern Sycamore Township and northern Sycamore township where this station is located.

Goals that had to be achieved LEEDS certification, construction debris management, LED lighting, meeting NFPA on specific requirement for the physical fitness room, living quarter's needs, and Personal Protection Environmentally control room for storage of PPE. Quality Air movement requirements for CO emissions. Alternate power supplies through diesel generator power.

Total square feet of the Community Room and Fire Station 19,000 square feet. The facility also had to meet specific AV requirements and wireless interfaces for internal and external use.

Total Project Cost: \$4.5 million Dollars.

Paducah Project; 2014-2015

Engage by Fluor- Daniels contractor for the Paducah Gas Diffusion Plant decommission.

Scope:

Provide a gap analysis on the current on-site fire department and facility. The project includes transition from Atomic Energy Commission to the Department of Energy requirements. The Paducah project was to evaluate the current fire department and facility to see how the change to meet NFPA 1500.

Analysis evolved to examining current facility that was erected during the 1940 era through 2014. The plant commissioning was determined to keep on-site fire protection during the next project decommissioning plan for the next 20 years.

The current facility didn't come into current NFPA 1500 compliance, and an evaluative measure was developed on how to meet specific upgrades to the current service. The Department of Energy has also expressed limited funding to the on-site facility.

Measurement of mutual aid fire department was also part of the project to access the external needs to protect the Paducah Plant under a decommissioning process.

Included in this project was to determine the need existing fire protection systems and requirement needed to maintain these systems under limited heating conditions. Project completion did provide the gap and evaluative measures as a template for the Health and Safety including on-site fire department to be used as the guide during the next five years as the plant moves towards decommissioning. **No Project Cost**

WILLIAM A. JETTER
PROFESSIONAL & PERSONAL REFERENCES

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Professor, Environmental Health
Adjunct Professor, Biomedical Engineering & Mechanical Engineering
Founding Director, Biomechanics-Ergonomics Research Laboratories
Founding Director, NIOSH sponsored Pilot Research Grant Graduate
Training Grant at University of Cincinnati
Biomechanics-Ergonomics Research Laboratories M.L. #056
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Lab Home Page: http://www.eh.uc.edu/ih/faculty_IH.asp

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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

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in

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

Summary: Response Response of City of Deer Park to First Set of Interrogatories and Requests for Production of Documents from Duke Energy Ohio electronically filed by Mr. Andrew J Helmes on behalf of City of Deer Park