

BEFORE THE
OHIO POWER SITING BOARD

In the Matter of:	:	CASE NO. 16-0253-GA-BTX
	:	
The Duke Energy Ohio Application for a	:	CITY OF READING STATEMENT OF
Certificate of Environmental Compatibility	:	SPECIFIC CONCERNS PERTAINING TO
and Public Need for the C314V Central	:	CROSS-EXAMINATION
Corridor Pipeline Extension Project	:	
	:	

The City of Reading, Ohio, identifies the following specific concerns about which it may be interested in pursuing cross-examination:

- 1) Matters identified as subjects for cross-examination in the filings made by the City of Reading, Amberley Village, and Sycamore Township in August of 2017;
- 2) Regarding the location of the proposed alternate route, the City has identified and communicated to Duke Energy Ohio several areas of concern including:
 - a) The large, developable collection of parcels lying immediately south of Third Street known as the Reading Life Science Expansion Site. The City considers the proposed location of the alternate route a major land use planning conflict with the future development of site. The Site was acquired by the City of Reading to encourage future development by the life science industries that are located south of the area along Galbraith Road. The area was acquired by the City for the purpose of consolidation and remediation of existing environmental issues with the assistance of the State of Ohio which provided the bulk of the funding through its Job Ready Sites Program. Access to the site is from Third Street and a new street (JRS Access) that fronts on Reading Road next to the Reading Branch of the Cincinnati and Hamilton County Public Library located at 8740 Reading Road. The PUCO permitted the establishment of this crossing, 936406W in exchange for the closing of the Elizabeth Street crossing, 524872N, in 2011. The Reading Life Science Expansion Area has been actively marketed since its acquisition and the City is currently in discussions with a private entity interested in expanding its life science manufacturing facility. The redevelopment of this parcel is vital to the health, safety, economic well-being, and welfare of the City and its residents. The location of the proposed alternate route is through the Reading Life Science Expansion Site and then continues through property owned by one of the city's largest employers. Locating the pipeline on the Reading Life Science Expansion Site will impair the ability of the City to market the area for its intended purpose and is unacceptable. Further, locating the pipeline adjacent to the existing railroad on the west boundary of the Reading Life Science

Expansion Site will eliminate the ability of any future development to install and make use of a rail spur in connection with the site.

- b) The City was recently informed by the Metropolitan Sewer District that it intends to construct a major project in the area of West Street and Bernard Avenue which may interfere with pipeline construction in that area. The project is being done in obedience to a Federal Consent Decree entered in *United States of America and the State of Ohio v. The Board of County Commissioners of Hamilton County, Ohio and the City of Cincinnati*; case no. 1:02-cv-107, United States District Court for the Southern District of Ohio, Western Division, Judge Michael R. Barrett, Doc 130 (Interim Order), June 9, 2004. The City will pursue cross-examination on whether this proposed project will impact the location of the proposed alternate route;
- 3) The City anticipates that it will pursue cross-examination regarding the number of residential housing units within 100 feet of the proposed alternate route, the number of parks, recreational facilities, cemeteries, and other cultural, archaeological, and architecturally significant resources located along the alternate route. The City is also concerned with the disruption that construction of the pipeline along the proposed alternate route will entail for its citizens, and is likewise concerned that its residents, businesses, and other property owners receive fair compensation for any property and property rights that may be taken in connection with the construction;
- 4) The City also anticipates that it may pursue cross-examination regarding the differences and efficiencies of transmission between the preferred and alternate routes.

Respectfully submitted,

/s/ David T. Stevenson ,

David T. Stevenson, 0030014

Law Director

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Certificate of Service

I hereby certify that a copy of the foregoing City of Reading Statement of Specific Concerns Pertaining to Cross-Examination was served upon all parties who have electronically subscribed to this case through the Docketing Information System of the Public utilities Commission of Ohio and the OPSB on this 22ND day of March, 2019. Service will be made by regular United States Mail to:

Anthony and Joan Boiano
9528 Bluewing Terrace
Blue Ash, Ohio 45241

Thomas and Patricia Kreitinger
6150 St. Regis Dr.
Cincinnati, Ohio 45236

/s/ David T. Stevenson

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in

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

Summary: Notice by City of Reading listing matters on which Cross-Examination may be sought electronically filed by Mr. DAVID T STEVENSON on behalf of CITY OF READING