

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of	:	Case No. 16-0253-GA-BTX
Duke Energy Ohio, Inc., for a	:	
Certificate of Environmental	:	
Compatibility and Public Need for	:	CITY OF BLUE ASH, OHIO’S LIST
the C314V Central Corridor	:	OF POTENTIAL ISSUES FOR
Pipeline Extension Project	:	CROSS-EXAMINATION OF
	:	WITNESSES AT THE
	:	ADJUDICATORY HEARING
	:	
	:	

Pursuant to The Ohio Power Siting Board’s Entry dated December 18, 2018, David Waltz, City Manager for the City of Blue Ash, Ohio (“Blue Ash”), by and through counsel, hereby provides the following list of potential issues about which Blue Ash may be interested in pursuing during cross-examination of witnesses at the adjudicatory hearing set for April 9, 2019:

1. What actions were taken by the Applicant to evaluate the need for the Pipeline to be constructed through Blue Ash?
2. What is the proposed construction schedule for the Pipeline in Blue Ash?
3. Given the cost differences between the Preferred Route and Alternate Route and the Staff Report’s recommendation of the Alternate Route, will the Applicant continue advocating for the Preferred Route?
4. Alternate Pipeline routes considered by the Applicant and the criteria used by the Applicant to determine which route to select.
5. How installing the Pipeline along the Preferred and/or Alternate route serves the public interest, convenience, and necessity in Blue Ash?
6. Under what circumstances would the proposed maximum operating pressure be increased from 400 psig?

7. What is the likelihood that the Pipeline's maximum operating pressure will be increased in the future?
8. If such a pressure increase occurs, would that cause the Pipeline to operate at a hoop stress of 20% or more of the Specified Minimum Yield Strength, which would lead to the Pipeline being classified as a Transmission Line rather than a Distribution Line?
9. Will the Pipeline be constructed in accordance with the requirements for Transmission Lines?
10. What safety precautions are being implemented during construction of the Pipeline in Blue Ash?
11. How much construction work will be performed by contractors and subcontractors and what is the process for choosing contractors and subcontractors?
12. How will the Applicant monitor the work performed by contractors and subcontractors to ensure that all safety requirements are followed?
13. Will Blue Ash have any input in the contractors and subcontractors hired?
14. What are the designs for the Pipeline markers along the proposed routes?
15. What are the proposed locations of Pipeline markers along the proposed routes and what is the procedure for determining placement of Pipeline markers?
16. What is the procedure for objecting to placement of Pipeline markers and how will those objections be handled?
17. What is the anticipated aesthetic impact during Pipeline construction in Blue Ash and what is being done to minimize the impact?
18. What is the aesthetic impact of permanent changes to the landscape in Blue Ash and what is being done to minimize the impact?
19. What is the aesthetic impact of the valve station to be located at Summit Park?
20. Potential issues with homeowners along the proposed routes:
 - a. What are the daytime hours proposed for construction during the week?

- b. What are the exceptions to the proposed construction hours that would extend those times?
 - c. How much notice will be provided to homeowners prior to construction?
 - d. How will that notice to homeowners be provided?
 - e. How will you obtain landowner approval for temporary access routes?
 - f. What is the process for determining whether existing vegetation or structures are incompatible with Pipeline maintenance?
 - g. What are the limitations on planting incompatible vegetation and erecting incompatible structures in the future?
 - h. Any permanent impacts to residential structures in Blue Ash?
21. What is the potential impact to property values due to the existence of the Pipeline in Blue Ash?
22. What is the potential impact on public services, such as traffic, during Pipeline construction?
23. How will construction hours be adjusted to avoid work taking place during peak traffic hours?
24. What type of traffic management will be necessary during the Pipeline installation phase?
25. How did the Applicant determine that the proposed Pipeline's Preferred and Alternate routes represent the minimum adverse environmental impact in Blue Ash, considering the state of available technology and the nature of the economics of various alternatives?
26. What is the procedure for determining laydown areas for storing excavation equipment and materials during Pipeline construction?
27. What is the procedure for disputing a laydown area for storing equipment and materials during Pipeline construction?
28. Are there any known developments or plans along the Pipeline route in Blue Ash that would be incompatible with the Pipeline?
29. How will the placement of the Pipeline affect Blue Ash's ability to perform future construction near the Pipeline, including all limitations on future construction?

30. What are the permanent restrictions on the future use of the Pipeline right-of-way in Blue Ash?
31. How will landowners be compensated for restrictions on future use of property?
32. What is the expected impact on Summit Park and the Blue Ash Sports Center as a result of Pipeline construction?
33. How will the Pipeline affect future commercial and residential development near Summit Park?
34. What impact will the Pipeline have on existing and future businesses located near Summit Park?
35. What is the expected impact on businesses located near Summit Park as a result of Pipeline construction?
36. How does the Applicant plan to minimize the impact on businesses located near Summit Park as a result of Pipeline construction?
37. How does the Applicant plan to minimize the impact caused by Pipeline construction on events taking place at Summit Park, such as Summitfest and Red, White & Blue Ash?
38. What impact will the Pipeline have on events taking place at Summit Park, such as Summitfest and Red, White & Blue Ash?
39. Has the Applicant evaluated the potential safety concerns that could arise during events taking place at Summit Park, such as Summitfest and Red, White & Blue Ash, which may attract 100,000 or more people?
40. Has the Applicant developed a safety plan in the event of a Pipeline leak or explosion during events taking place at Summit Park, such as Summitfest and Red, White & Blue Ash?
41. The Applicant's ability to address Blue Ash's concerns regarding the conflict between the Pipeline and future roadway improvements to Pfeiffer Road between Kenwood Road and the I-71 Interchange?
42. The Applicant's ability to address Blue Ash's concerns regarding the conflict between the Pipeline and the Malsbary Road Extension construction project?

43. The Applicant's ability to address Blue Ash's concerns regarding the Preferred Route's effect on the future sale of residual Malsbary property?
44. The Applicant's ability to address Blue Ash's concerns regarding the Preferred Route's conflict with streetscape improvements installed in Downtown Blue Ash in 2016?
45. The Applicant's ability to address Blue Ash's concerns regarding the Preferred Route's alignment with economically disadvantaged areas of Blue Ash?
46. The Applicant's ability to address Blue Ash's concerns regarding the Pipeline's potential impact on the integrity of Kenridge Lake Dam?
47. The Applicant's ability to address Blue Ash's concerns regarding the storm water culvert near Ursuline Academy on the south side of Pfeiffer Road?
48. The Applicant's ability to address Blue Ash's concerns regarding the storm water channel located behind 10250 Alliance Road?
49. The Applicant's ability to address Blue Ash's concerns regarding the Pipeline's impact on the LSI detention basin located at 10070 Alliance Road?
50. The Applicant's ability to address Blue Ash's concerns regarding the storm water culvert under Keystone Plaza located at 9737 Kenwood Road?
51. The Applicant's ability to address Blue Ash's concerns regarding the Alternate Route's conflict with the future roadway improvements to Glendale-Milford Road between Plainfield Road and Reed Hartman Highway?
52. The Applicant's ability to address Blue Ash's concerns regarding the Alternate Route's conflict with future sidewalk improvements to Reed Hartman Highway north of Cornell Road?
53. The Applicant's ability to address Blue Ash's concerns regarding the Alternate Route's conflict with existing sidewalk and retaining walls located on the west side of Reed Hartman Highway south of Cornell Road?
54. The Applicant's ability to address Blue Ash's concerns regarding the Alternate Route's conflict with the City of Blue Ash Sports Center double barrel culvert which connects to the I-275 drainage system?

55. The Applicant's ability to address Blue Ash's concerns regarding the utility conflicts along the east side of Reed Hartman Highway from Osborne Boulevard to Creek Road which involve multiple communications providers?
56. The Applicant's ability to address Blue Ash's concerns regarding the storm water culvert (72-inch) at Reed Hartman Highway and Glendale-Milford Road?
57. If construction crosses concrete driveways or parking areas, will the Applicant replace and repave all concrete in order to alleviate cracking and mismatched concrete?
58. What is the timeframe for returning property to its original condition after construction is complete?
59. What is the procedure if Blue Ash or any resident of Blue Ash is unsatisfied with the remedial work performed after construction? How will that be resolved?
60. What type of public information program will be developed that will inform affected property owners and local government officials of the nature of the project, specific contact information of personnel familiar with the project, the proposed timeframe for project construction, and a schedule for restoration activities?
61. Will there be a complaint resolution procedure to address public grievances resulting from project construction and operation of the Pipeline?
62. After construction is complete, when will the Pipeline begin operations?
63. Who is responsible for monitoring properties for settling, cracking, and/or sinking during operation of the Pipeline?
64. What is the procedure if settling, cracking, and/or sinking occurs during operation of the Pipeline?
65. What safety precautions are being implemented to prevent explosions or leaks during operation of the Pipeline?
66. What is the potential size, scale, and geographic impact of an explosion or leak in Blue Ash involving the Pipeline?

67. What safety precautions are being implemented to prevent excavators from striking or exposing the Pipeline in the future?
68. What is the response plan in the event of an emergency, such as a leak, explosion, or other catastrophic event, in Blue Ash?
69. What is the required evacuation zone in the event of a leak or other catastrophic event in Blue Ash?
70. What steps has the Applicant taken to coordinate its emergency response plan with the City of Blue Ash Police Department, Fire Department, and Public Works Department?
71. Will personnel from the City of Blue Ash need any specialized training in order to respond under the Applicant's emergency response plan? If so, what is the nature of such training?
72. How will a leak, explosion, or other catastrophic event involving the Pipeline affect service delivery for Blue Ash residents?
73. In the event of an explosion, leak, or other damage involving the Pipeline, what is the time required to repair and/or replace the damaged Pipeline?
74. How much of the natural gas that will run through the Pipeline will be used to serve end users in Ohio versus end users outside of Ohio?
75. The Applicant's compliance with the conditions and recommendations contained within the Staff Report of Investigation.
76. The Applicant's compliance with Ohio Revised Code § 4906.10 and any other applicable law.
77. The Applicant's objections and responses to discovery requests from any party who intervened in this proceeding.
78. Any issues raised in any other party's list of potential issues for cross-examination of witnesses.
79. Any part of filed testimony, including exhibits, submitted by any party to this proceeding.

80. The recommended conditions of the May 31, 2017 Staff Report of Investigation, as well as corresponding sections of said Staff Report.
81. The recommended conditions of the March 5, 2019 Amended Staff Report of Investigation, as well as corresponding sections of said Amended Staff Report.
82. What calculations were made to determine whether a minimum of 15 feet between the Pipeline centerline and existing structures is safe?
83. Whether the Applicant has established a clear need for the Pipeline.
84. The Applicant's plans for replacement, repair, or improvement of the A-Line.
85. The flow of gas through the A-Line and the system as a whole, as it relates to the need for the new Pipeline.

Respectfully submitted,

s/ Bryan E. Pacheco

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on 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. The docketing division's e-filing system will electronically serve notice of the filing of this document on the following parties:

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Summary: Notice Notice of City of Blue Ash, Ohio's List of Potential Issues for Cross-Examination of Witnesses at the Adjudicatory Hearing electronically filed by Mr. Bryan E. Pacheco on behalf of City of Blue Ash, Ohio