

**BEFORE THE  
OHIO POWER SITING BOARD**

In the Matter of the Application of Duke	)	
Energy Ohio, Inc., for a Certificate of	)	
Environmental Compatability and Public	)	Case No. 16-0253-GA-BTX
Need for the C314V Central Corridor	)	
Pipeline Extension Project.	)	
	)	

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**LIST OF ISSUES OF THE CITY OF CINCINNATI AND THE BOARD OF  
COUNTY COMMISSIONERS OF HAMILTON COUNTY**

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Pursuant to Paragraph 20(b) of the Administrative Law Judge's Entry on December 18, 2018, in the above-captioned case, the City of Cincinnati ("City") and the Board of County Commissioners of Hamilton County ("County") list the following specific concerns about which they may be interested in pursuing cross-examination of witnesses at the evidentiary hearing. The City and County reserve the right to pursue additional issues at hearing that may arise based on pre-filed expert and factual testimony of the parties and any other issues raised during cross-examination. The City and County present their list of specific concerns as follows:

1. Duke's failure to demonstrate a need for the proposed C314V Central Corridor Pipeline Extension Project ("Project");
2. The timeliness of retiring or replacing existing facilities;
3. The impact of the Project on securing a more balanced system supply from north to south;
4. The impact that the Project and the proposed routes will have on the reliability of the distribution system;
5. The exploration and feasibility of implementing alternative measures to repair and replace aging infrastructure;
6. The due diligence performed by Duke in considering and analyzing alternatives to the Project;

7. The selection and location of routes within the central corridor to extend or otherwise justify the existing Line C314;
8. Flaws in Duke's modeling and peak demand assumptions used to support the need for the Project;
9. The safety and environmental impact of the Project's construction and excavation through potentially contaminated industrial areas, including but not limited to the area surrounding the Pristine, Inc. Superfund site;
10. The failure to identify the number of, and potential impact to, residences and structures within the Potential Impact Radius of 308.6 feet from the centerline for each of the proposed routes for the Project;
11. Addressing issues and concerns related to propane intolerant customers;
12. The propane-air facilities' risk of failure and identifying effective, cost efficient mechanisms for reducing that risk;
13. The exploration of potential alternatives to the retirement of propane-air facilities;
14. The absence of any emergency response plan for the Project;
15. The Project's imposition of restrictions on future use of the pipeline right-of-way;
16. The protracted process to resolve contentious land-owner issues in the central corridor region and its impact on the stated goals of the Project;
17. Diminishing the Project's impact on local communities, residents, and businesses, including but not limited to Duke's public representations concerning the same;
18. Duke's failure to demonstrate that the Project will serve the public interest, convenience, and necessity;
19. The adverse environmental and ecological impact of the Project and the proposed routes;
20. The direct and indirect impact to land use caused by the Project;
21. The Project's detrimental impact on regional development;

22. The Project's adverse impact to public services in the region, including but not limited to increased traffic and congestion on public roads and highways, road closures, lane closures, and road access restrictions;
23. The uncertainty of and variation in cost estimates for the Project;
24. The Project's adverse impact on recreational activities, including the public enjoyment of and access to parks and recreation areas;
25. The necessity of providing additional safeguards and conditions, beyond those articulated on pages 60 through 65 in the Amended Staff Report, to comprehensively address the potential environmental, ecological, and socioeconomic impacts caused by the Project;
26. The aesthetically unpleasing visual impacts along the proposed routes;
27. The construction, operation, and maintenance of the Project's impact on the health and safety of residents and local communities; and
28. Staff's Report and the conditions therein.

Joseph T. Deters, Prosecuting Attorney  
Hamilton County, OH

/s/ James F. Lang

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was electronically filed through the Docketing Information System of the Public Utilities Commission of Ohio (“PUCO”) on this 22th day of March, 2019. The PUCO’s e-filing system will electronically serve notice of the filing of this document on counsel for all parties.

/s/ James F. Lang

One of the Attorneys for the City of Cincinnati and the Board of County Commissioners of Hamilton County

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

Summary: Notice of List of Issues electronically filed by Mr. James F Lang on behalf of City of Cincinnati and Board of County Commissioners of Hamilton County