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 Need for the C314V Central Corridor Pipeline Extension Project Case No. 16-0253-GA-BTX

THE VILLAGE OF GOLF MANOR, OHIO'S LIST OF ISSUES FOR CROSS-EXAMINATION OF

CRUSS-EXAMINATION OF

WITNESSES AT THE EVIDENTIARY

HEARING

:

Pursuant to The Ohio Power Siting Board's Entry, dated December 18, 2018, the Village of Golf Manor, Ohio ("Golf Manor") by and through counsel, hereby propounds the following list of issues about which Golf Manor may be interested in pursuing during cross-examination of witnesses at the evidentiary hearing set for April 9, 2019 at 10:00 a.m:

- 1. Other routes that were investigated besides the preferred and alternate routes.
- 2. Precise proposed alternate route as it relates to the Village of Golf Manor, i.e. is the alternate route located east or west of the railroad tracks as it travels south from Losantiville road.
- 3. Actions taken by the Applicant to eliminate the need for the pipeline to be constructed adjacent to Golf Manor.
- 4. Anticipated beginning and completion dates for pipeland construction.
- 5. Circumstances under which the proposed maximum operating pressure would be increased.
- 6. Safety precautions to be implemented during construction of the Pipeline.
- 7. Process for choosing contractors and subcontractors to install and maintain the Pipeline.

- 8. Manner in which the Applicant will monitor the work performed by its employees, contractors, and subcontractors to ensure that all safety requirements are followed in the construction and maintenance of the pipeline
- 9. Input Golf Manor will have regarding contractors and subcontractors hired.
- 10. The impact of permanent changes to the land and landscaping in Golf Manor/adjacent to the Village of Golf Manor.
- 11. Input Golf Manor will have as to permanent changes to the land and landscaping in Golf Manor/adjacent to the Village of Golf Manor.
- 12. Particulars regarding construction, such as: Hours proposed for construction/notice to property owners prior to construction/effect on traffic of construction etc.
- 13. Impact to property values due to the existence of the Pipeline in Golf Manor/adjacent to the Village of Golf Manor.
- 14. Environmental impact to the Village of Golf Manor.
- 15. Effect on pipeline route if the applicant cannot obtain the easements necessary for the current pipeline route.
- 16. Manner in which placement of the pipeline will affect Golf Manor's ability to perform future construction at or near the pipeline, including all limitations on future construction and road work.
- 17. Affect of placement of the pipeline upon a property owner's ability to perform future construction at or near the Pipeline.
- 18. Landowners compensation for restrictions on future use of property.
- 19. Timeframe for returning property to its original condition after construction is complete.
- 20. Complaint resolution procedure to address grievances resulting from project construction and operation of the Pipeline.

- 21. Responsibility for monitoring properties for settling, cracking, and/or sinking during construction or operation of the pipeline.
- 22. Procedure if settling, cracking, and/or sinking occurs during construction or operation of the Pipeline.
- 23. Safety precautions implemented to prevent explosions or leaks during operation of the Pipeline.
- 24. The potential size, scale, and geographic impact of an explosion or of the pipeline as it relates to the Village of Golf Manor.
- 25. Consideration given for emergency assets, EMS, fire, police, located within the blast zone of the pipeline in the event of an explosion of the pipeline.
- 26. Safety precautions that will be implemented to prevent excavators from striking or exposing the pipeline.
- 27. Emergency response plan in the event of an emergency, such as a leak or explosion or the pipeline/co-ordination of such plan with the local EMS, fire department, police department.
- 28. Evacuation zone for Golf Manor in the event of a leak or other catastrophic event.
- 29. Notification procedure if an evacuation is necessary.
- 30. The nature of any special training for the Village of Golf Manor to implement applicant's emergency response plan.
- 31. Cost/who will pay for such specialized training to implement applicant's emergency response plan.

In addition to the above issues, Golf Manor incorporates, as if fully restated herein, and reserves the right to question any witnesses with respect to any and all issues addressed in any other intervening party's list of potential issues for cross-examination of witnesses and any conditions or issues raised or addressed in the Amended Staff Report

of Investigation dated March 5, 2019 as it may be amended or supplemented from time to time.

Respectfully submitted,

/s/ Robert T. Butler

Robert T. Butler (0046610)
Donnellon Donnellon & Miller
9079 Montgomery Road
Cincinnati, Ohio 45242
Telephone: (513) 891-7087

Facsimile: (513) 891-7125

E-mail:butler@donnellonlaw.com

Attorney for Intervenor

The Village of Golf Manor, Ohio

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:

William Wright
Section Chief
Robert Eubanks
Assistant Attorney General
Steven Beeler
Assistant Attorney General
Public Utilities Section
30 East Broad St., 6th Floor
Columbus, Ohio 43215
William.wright@ohioattorneygeneral.gov
Robert.eubanks@ohioattorneygeneral.gov
steven.beeler@ohioattorneygeneral.gov
Counsel for Staff of the Commission

James Yskamp
Emily A. Collins
Fair Shake Environmental Legal
Services
159 S. Main Street, Suite 1030
Akron, OH 44308
jyskamp@fairshake-els.org
ecollins@fairshake-els.org
Counsel for NOPE –
Neighbors Opposed to Pipeline
Extension, LLC

Brian W. Fox
Graydon Head & Ritchey LLP
312 Walnut St. Suite 1800
Cincinnati, OH 45202
bfox@graydon.law
Counsel for Mayor Melisa Adrien,
City of Madeira

Gregory G. Laux
Attorney at Law
3134 Schubert Avenue
Cincinnati, Ohio 45213
glaux2001@gmail.com
Counsel for Pleasant Ridge
Community Council

James F. Lang
Steven D. Lesser
Mark T. Keaney
Calfee, Halter & Griswold LLP
The Calfee Building
1405 East Sixth Street
Cleveland, OH 44114
ilang@calfee.com
slesser@calfee.com
mkeaney@calfee.com
Counsel for the City of Cincinnati and
for

the Board of County Commissioners of Hamilton County, Ohio

Timothy M. Burke
Micah E. Kamrass
Manley Burke, LPA
225 W. Court Street
Cincinnati, OH 45202
tburke@manleyburke.com
mkamrass@manleyburke.com
Counsel for the Village of Evendale

Bryan E. Pacheco
Mark G. Arnzen, Jr.
Dinsmore & Shohl LLP
255 East Fifth Street, Suite 1900
Cincinnati, OH 45202
Bryan.pacheco@dinsmore.com
Mark.arnzen@dinsmore.com
Counsel for City Manager David
Waltz and the City of Blue Ash, Ohio
and for Columbia Township and
David Kubicki, President of the Board
of Trustees of Columbia Township

Jeanne W. Kingery
Amy B. Spiller
Duke Energy Ohio, Inc.
155 E. Broad Street, 20th Floor
Columbus, Ohio 43215
Jeanne.kingery@duke-energy.com
Amy.spiller@duke-energy.com
Counsel for Duke Energy Ohio, Inc.

Kevin C. McDonough
Wood & Lamping LLP
600 Vine Street, Suite 2500
Cincinnati, OH 45202-2491
kc.mcdonough@woodlamping.com
Counsel for Amberley Village and
Scot Lahrmer, Village Manager

Dylan F. Borchers
Devin D. Parram
Bricker & Eckler LLP
100 South Third Street
Columbus, OH 43215-4291
dborchers@bricker.com
dparram@bricker.com
Counsel for The Jewish Hospital –
Mercy Health

Roger E. Friedmann
Michael J. Friedmann
Jay R. Wampler
Assistant Prosecuting Attorneys
Suite 4000
230 E. Ninth Street
Cincinnati, OH 45202
Roger friedmann@hcpros.org
Michael friedmann@hcpros.org
Jay.wampler@hcpros.org
Counsel for Board of County
Commissioners of Hamilton County,
Ohio

R. Douglas Miller, Esq.
Solicitor, Sycamore Township, Ohio
Donnellon, Donnellon & Miller LPA
9079 Montgomery Road
Cincinnati, OH 45242
tmd@donnellonlaw.com
Counsel for Sycamore Township, Ohio

David T. Stevenson
Law Director
City of Reading
1000 Market St.
Reading, OH 45215
dstevenson@cinci.rr.com
Counsel for the City of Reading

Andrew J. Helmes
Law Director
City of Deer Park
7777 Blue Ash Road
Deer Park, OH 45236
ahelmes@deerpark-oh.gov
Counsel for Mayor John Donnellon
and the City of Deer Park, Ohio

Joseph Oliker Counsel of Record 6100 Emerald Parkway Dublin, OH 43016 joliker@igsenergy.com Counsel for IGS Energy

Kent Bucciere
The Bucciere Firm
10149 Kenwood Rd
Blue Ash, OH 45242
Kent.bucciere@gmail.com
Counsel for 10149 LLC
Counsel for RLB Inc.
Counsel for Coprop Inc.

Richard B. Tranter
Kevin M. Detroy
Dinsmore & Shohl LLP
255 East Fifth Street, Suite 1900
Cincinnati, OH 45202
Richard.tranter@dinsmore.com
Kevin.detroy@dinsmore.com
Counsel for BRE DDR Crocodile
Golf Manor Square LLC
Counsel for Kenwood Mall, LLC

PUCO Docketing Staff
180 E. Broad St., 11th Floor
Columbus, OH 43215
docketing@puco.ohio.gov
Matthew.butler@puco.ohio.gov
Patrick.donlon@puco.ohio.gov
Robert.hooderbaum@puco.ohio.gov
Vesta.miller@puco.ohio.gov
Donielle.hunter@puco.ohio.gov
Debra.hight@puco.ohio.gov
Felicia.burdett@puco.ohio.gov

The following parties have not been served via the email notice and have been served by regular U.S. Mail on the same date indicated above:

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

Thomas A. and Patricia H. Kreitinger 6150 St. Regis Dr. Cincinnati, OH 45236

/s/ Robert T. Butler

Robert T. Butler (0046610)

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

3/22/2019 4:05:40 PM

in

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

Summary: Text The Village of Golf Manor, Ohio's List of Issues For Cross-Examination of Witnesses at the Evidentiary Hearing electronically filed by Mr. Robert T. Butler on behalf of The Village of Golf Manor, Ohio