

**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. 16-253-GA-BTX

DIRECT TESTIMONY OF

Sam Cordray

on behalf of

THE JEWISH HOSPITAL – MERCY HEALTH

April 2, 2019

1 **I. INTRODUCTION AND PURPOSE OF TESTIMONY**

2 **Q: Please state your name.**

3 A: Sam Cordray

4 **Q: By whom are you employed?**

5 A: The Jewish Hospital – Mercy Health (“The Jewish Hospital” or “Hospital”).

6 **Q: What is your business address?**

7 A: 4777 E. Galbrath Rd., Cincinnati, OH 45236

8 **Q: Please state your educational background and work history.**

9 A: I am a high school graduate, with additional education in woodworking at the OMI College of
10 Applied Science and A/C and Refrigeration I & II at the University of Cincinnati. I started
11 working at The Jewish Hospital as a teenager and have been an employee of the Hospital for 45
12 years. For the last 10 years, I have been the manager of facilities for the Hospital. In this role,
13 my responsibilities include overseeing daily operations and managing construction projects. I
14 have also been involved in the Joint Commission for Accreditation, which oversees the
15 Hospital’s responses to surveys pertaining to life safety, environment of care, and emergency
16 management. I am also the appointed safety officer for the Hospital. Finally, I am responsible
17 for facility security and have completed the background check process to comply with the
18 requirements of 10 Code of Federal Regulations (“C.F.R.”) Part 37, “Physical Protection of
19 Category 1 and Category 2 Quantities of Radioactive Material.”

20 **Q: Have you previously testified before any regulatory agency?**

21 A: No

22 **Q: Please describe The Jewish Hospital and its role in the community.**

A: The Jewish Hospital is a community hospital faithful to its Jewish heritage and grounded in the Jewish and Catholic traditions of service to the community. The Hospital provides advanced, compassionate, quality care in the greater Cincinnati area and surrounding communities through its care network. The Jewish Hospital is located in Kenwood, a Cincinnati suburb that provides convenient access from around the Tri-state. The Hospital has 196 beds and operates at full capacity.

Q: Please indicate the purpose of your testimony today.

A: The purpose of my testimony is to identify the adverse impacts that Duke Energy Ohio, Inc.'s ("Duke Energy") proposed "Preferred Route" of the C314V Central Corridor Pipeline Extension Project (the "Pipeline") may have on the Jewish Hospital and its patient care. Specifically, my testimony will address: 1) the Pipeline's proximity to the Hospital's underground utility infrastructure, including the potential disruption to the Hospital's primary electric power service; 2) the Pipeline's proximity to the Hospital's Gamma Knife, which is powered through a radioactive nuclear fuel source; 3) the Pipeline's proximity to underground fuel storage tanks; 4) the impact of the Pipeline's construction to emergency medical services' ("EMS") and patient access to the Hospital; and 5) the Pipeline's impact on future, necessary expansion of the Hospital's campus.

Q: Where is the Pipeline located relative to The Jewish Hospital?

A: Duke Energy's Preferred Route runs east-west under Galbraith Rd., and turns south on Frolic Rd., and then east-west again on Happiness Way. Along this route, the Pipeline would border the Hospital's campus on both the west and the south. Map Page 4 of the Amended Staff Report of Investigation illustrates the location of the Pipeline relative to The Jewish Hospital.

II. THE PIPELINE'S IMPACT TO THE HOSPITAL'S ELECTRIC SERVICE

Q: Please describe how The Jewish Hospital's electric service may be impacted by the Pipeline.

A: The Hospital receives its primary electric power service through underground electric lines that run north to south, parallel to Frolic Rd. Duke Energy's Pipeline will cross over and run along the underground electric lines. It is our understanding that the pipeline and electric lines will be in very close proximity. The Jewish Hospital is concerned that the construction of the Pipeline, due to its close proximity to the underground electric lines, could disrupt electric service to the Hospital. Construction of the Pipeline could damage the electric lines, or Duke Energy may need to temporarily shut-off electric service to the Hospital out of safety concerns when contractors are working in close proximity to the underground electric lines. In either circumstance, electric service to the Hospital would be disrupted during construction. Further, the risk for electric service disruption would be ongoing as Duke Energy's periodic maintenance and repairs of the Pipeline may similarly damage the electric lines or require service to be shut-off.

Q: Please describe the impact to The Jewish Hospital if electric service is disrupted.

A: There are two electric feeds running north and south along the parking garage on Frolic Rd., tying into Deerpark Terminal 48. The Heart & Lung Tower at The Jewish Hospital (the "North Tower"), a state-of-the-art facility dedicated to treatment of major organs, is powered completely from one of those feeds. As a result, any disruption to the electric feed would leave the North Tower with only critical power supply from the MIGII Generator housed in the energy building behind the parking garage along Frolic Rd. In this situation, the North Tower could not operate at full capacity. Some lighting and computer equipment would lose power and not be able to function. Only outlets directly connected to generators or tied to critical power would be

operational. The second feed is for the 1500Kw generator serving the South Tower, which has been in place since 1997. The South Tower consists primarily of patient beds and operating rooms. If it loses power, the load will transfer to a third electric feed 1000Kw generator, which is already serving the Diagnostic & Treatment and East buildings. If this third feed is lost, the entire Hospital would be forced to run on generators. At that point, the Hospital would lose the chillers for cooling that serve fifteen operating rooms, computed tomography, magnetic resonance imaging, and catheterization laboratories, along with all normal power outlets throughout the Hospital. All surgery cases would be cancelled. It would be difficult to maintain the temperature and humidity levels required for patient comfort, safety, and care.

Q: Does Duke Energy's application to the OPSB identify the risk of a power outage at the Hospital during construction of the Pipeline?

A: No.

III. THE PIPELINE'S PROXIMITY TO RADIOACTIVE EQUIPMENT

Q: What is the Gamma Knife at The Jewish Hospital?

A: Despite its name, the Gamma Knife is not a knife but is a machine that delivers a single, finely focused, high dose of radiation to targeted tissue, while causing little or no damage to surrounding tissue. The Gamma Knife is an advanced radiation treatment for adults and children with small to medium brain tumors, abnormal blood vessel formations, epilepsy, trigeminal neuralgia, a nerve condition that causes chronic pain, and other neurological conditions. Abnormalities measuring less than one inch in diameter can be treated with the Gamma Knife. The Jewish Hospital maintains the only Gamma Knife in the Cincinnati area.

Q: How is the Gamma Knife fueled?

The Gamma Knife is powered through a nuclear fuel source, located at The Jewish Hospital. The delivery and maintenance of the Gamma Knife fuel is overseen, in part, by the Department of Homeland Security.

Q: Does the Pipeline pose a risk to the nuclear fuel for the Gamma Knife located at The Jewish Hospital?

A: The Jewish Hospital recognizes that pipeline explosions are uncommon. However, because of the nuclear material located at the Hospital, the enhanced risk posed by a pipeline explosion should not be overlooked. Based on its application and filings to-date, Duke Energy has not evaluated whether the nuclear material stored at the Hospital for the Gamma Knife would be impacted by a worst-case-scenario explosion of the Pipeline adjacent to the Hospital.

Q: Does Duke Energy's application address the proximity of the Pipeline to nuclear fuel?

A: No.

IV. THE PIPELINE'S PROXIMITY TO UNDERGROUND FUEL STORAGE TANKS

Q: Please describe the underground fuel storage tank located at The Jewish Hospital.

A: As required under Ohio Building Code references to National Fire Protection Association Standard 110, and in accordance with American Society for Civil Engineers Standard 7, the Hospital is required to maintain a minimum of 96 hours of fuel supply. The Jewish Hospital stores diesel fuel in an underground tank onsite for use in the Hospital's back-up generators. The underground fuel storage tank is located in the southwest corner the Hospital's property, approximately three feet underground. The storage tank contains approximately 35,000 gallons of diesel fuel and is 53 feet long and is just over 10 feet in diameter.

Q: Approximately how close will the Pipeline be to the underground fuel storage tank?

114 A: Tank is approximately 180 feet from Frolic Rd. and 85 feet from Happiness Way.

115 **Q: Does the Pipeline pose a risk to the underground fuel storage tank located at The Jewish**
116 **Hospital?**

117 A: Again, The Jewish Hospital recognizes that pipeline explosions are uncommon. However,
118 the proximity of the Pipeline to a large quantity of diesel fuel should not be overlooked.

119 **Q: Does Duke Energy's application address the proximity of the Pipeline to the**
120 **underground fuel storage tank?**

121 A: No.

122 **V. THE PIPELINE'S IMPACT TO EMS AND PATIENT ACCESS**

123 **Q: What entrances do EMS and patients use to access The Jewish Hospital?**

124 A: The Hospital's primary entrance for EMS and patients is on Kenwood Rd., while a secondary
125 entrance is available on E. Galbraith Rd.

126 **Q: How might the Pipeline impact EMS and patient access to The Jewish Hospital?**

127 A: The Pipeline construction is likely to cause traffic back-up and delays on the roads
128 surrounding The Jewish Hospital, making it more difficult for EMS and patients to access the
129 facility. In the event that there is a mishap or some unplanned event during construction, access
130 to the Hospital would likely be further impacted. Any damage to the roads, caused by the heavy
131 construction vehicles and equipment, would also impact the ability of EMS and patients to
132 access the Hospital. Finally, these negative effects would likely reoccur whenever Duke Energy
133 needed to conduct maintenance or repairs of the Pipeline.

134 **Q: Does Duke Energy's application address the impact of the Pipeline to EMS and patient**
135 **access to The Jewish Hospital?**

136 A: No.

137 **VI. THE PIPELINE’S IMPACT TO FUTURE EXPANSION OF THE HOSPITAL**

138 **Q: Is it likely that The Jewish Hospital will need to expand to continue to meet the needs of**
139 **the surrounding community?**

140 The Hospital has continually expanded its facilities to meet the growing needs of the surrounding
141 community. At this point, any future expansion must be outside of the Hospital’s current
142 footprint. To provide some background, in 1997, when the South Tower opened, the Hospital
143 was a 145 bed facility with two medical office buildings. Shortly after opening the South Tower,
144 the Hospital was at capacity. In 2000, the medical office buildings were moved offsite in order
145 to create an additional 40 bed area for patients. To continue to meet growing demand, another
146 20 bed area for patients was created. In 2004, the Hospital’s Emergency Department was
147 expanded, but still frequently remained at capacity. Since that time, the Hospital facilities have
148 been continuously renovated to create more room for patients and to provide advanced,
149 comprehensive care. In the last three years, the Hospital added four new state-of-the-art
150 operating rooms, remodeled three existing operating rooms, created a new Post Anesthesia Care
151 Unit, an Endoscopy suite, two cardiac catheterization laboratories, an Electrophysiology
152 Procedure laboratory, a new sterile processing area, an Acute Rehabilitation Unit, plus a new six
153 story 154,000 square foot patient tower providing a larger space needed for the Emergency
154 Department, Same Day Surgery, Cancer Care Center, Intensive Care Unit, Orthopaedic /
155 Neurosurgery Unit, and a rooftop helipad. In 2017, an upgrade was completed for the Hospital’s
156 Gamma Knife, and installation of an MRI suite. Recently, the Hospital completed construction of
157 a sterile processing area, medical auditorium, and a larger dining area for visitors and employees.
158 Finally, a new phase of renovations has started, which includes classrooms, simulation labs for
159 our large residency program, and a medical library.

160

161 This is all to highlight that there has been constant growth at the Hospital facility in order to meet
162 the needs of our patients. The Hospital continues to expand services, therefore increasing the
163 need for more physical space to house and treat patients. The Hospital is currently at 100%
164 capacity every day Monday-Friday, with some days at 115% capacity or greater, and 75% on
165 weekends. Any additional expansion at this point would have to be outside of the Hospital's
166 existing footprint. The Pipeline would effectively block the Hospital's ability to expand beyond
167 its footprint to continue to meet the needs of the community.

168 **Q: Where would future expansion of The Jewish Hospital's facilities have to occur?**

169 The expansion of the Hospital campus would have to occur west of the existing campus on Frolic
170 Rd. and south of the campus at Happiness Way, effectively on top of the Pipeline. There is no
171 other direction for the Hospital to expand to meet the growing needs of the community.

172 **VII. CONCLUSION**

173 **Q: Do you have any additional comments?**

174 A: For the reasons discussed in my testimony, the Hospital opposes the Preferred Route as
175 proposed in Duke Energy's application.

176 **Q: Does this conclude your testimony?**

177 A: Yes it does.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the Pre-filed Testimony of Mr. Sam Cordray has been served upon the following parties listed below by electronic mail, this 2nd day of April 2019.



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Summary: Testimony of Sam Cordray of behalf of The Jewish Hospital - Mercy Health
electronically filed by Teresa Orahoad on behalf of Dylan F. Borchers