

From: [Michael Coady](#)
To: [Puco Docketing](#)
Subject: PUBLIC UTILITIES COMMISSION OF OHIO - CASE #: 00544512 [ref:_00Dt0GzXt._500t0MbWAm:ref]
Date: Friday, September 27, 2019 10:37:19 AM
Attachments: [Haynes Goddard, Ph.D. comments.docx](#)



**PUBLIC UTILITIES COMMISSION OF OHIO
Consumer Service Division
Memorandum**

CASE ID: 00544512
COMPANY:
CUSTOMER: Haynes Goddard
ADDRESS: , ,
SERVICE ADDRESS: , ,
AIQ: PUCO
NIQ: 5133518420

To ensure your response attaches to the appropriate case, please reply to this email without changing the subject line. Thank you!

DOCKETING CASE #: 19-47-GA-ORD

SUBJECT: PUCO - Gas Pipeline Safety

Please docket the attached in the case number above.

Sincerely,

Michael Coady
Public Utilities Commission of Ohio
Service Monitoring and Enforcement Department
Lead Customer Service Investigator
(800) 686-PUCO (7826)
www.PUCO.ohio.gov

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September 22, 2019

Submitted by Haynes Goddard, Ph.D., Professor of Economics, Emeritus, University of Cincinnati.
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I note that in the Commission's announcement on January 9, 2019 for CASE NO. 19-47-GA-ORD, the title of the announcement was "IN THE MATTER OF THE COMMISSION'S REVIEW OF THE GAS PIPELINE SAFETY RULES IN CHAPTER 4901:1-16 OF THE OHIO ADMINISTRATIVE CODE".

And I further note that the title of that section of the ORC is Gas Pipeline Safety.

Since this announcement was explicitly about gas pipeline safety rules, several citizens from Cincinnati naively thought that the Commission Staff would be entertaining testimony on the many safety issues, as exemplified by the Duke Energy Ohio proposed high pressure and volume natural gas pipeline it wants to place in high consequence areas of high population, hospitals, schools, industrial and commercial areas of the Cincinnati region.

Clearly the Staff misled us, since after we presented several comments with suggestions about how to promote safe pipeline siting in general at the hearing, the Staff wrote this in its August 14th, 2019 recommended amendments (bold added):

10. What input was provided by the stakeholders, and how did that input affect the draft regulation being proposed by the Agency?

At the February 14, 2019 workshop, Columbia provided testimony suggesting changes be made to: Ohio Adm.Code 4901:1-16-04(A) and (I)(1), 4901:1-16-06(A), and 4901:1-16-08(B). In response to Columbia's suggestions, Staff has incorporated Columbia's recommendations to Ohio Adm.Code 4901:1-16-04(I)(1) and 4901:1-16-08(B). Additionally, there were several Ohio constituents in attendance at the workshop who offered testimony; however, this testimony referred to a currently pending Ohio Power Siting Board Case No. 16-253-GA-BTX. The siting process of pipeline facilities in Ohio is separate from the Commission's review of the gas pipeline safety rules detailed in Ohio Adm.Code Chapter 4901:1-16. To that end, the Commission will consider all comments provided by the stakeholders in attendance at the workshop, as well as all comments that are filed in the docket regarding the review of Ohio Adm.Code Chapter 4901:1-16.

While our direct experience was limited to the Duke case, we cited it only as a graphic example of what needs to be corrected in PUCO's safety requirements for pipeline siting. Yet this Staff report conveniently dismisses it as not relevant to the safety hearing and workshop it convened on February 14th.

I am quite familiar with workshops, and Staff asked zero questions for clarification of the Cincinnati presenters, and engaged in zero discussion with them. This was not a workshop. Staff clearly misrepresented this meeting and abused the efforts of the citizens who presented suggestions for safety improvements.

When high pressure gas pipelines can be placed next to occupied buildings, there is a clear public safety issue. These risks can be readily examined with the available tools to estimate the thermal danger in the high consequence zones and also the probability of death, burn injury and property damage. Yet there has never appeared a word in this regard in the Staff assessments of pipeline siting.

Clearly this workshop was not intended to discuss safety issues, despite its title.

This Staff failure is simply another in the sorry history of Staff's handling of the public safety issue with respect to gas pipelines. I conclude that Staff, instead of protecting Ohio citizens, in fact is in the pocket of those who threaten public safety.

You need to do better. I will be alerting my representatives to this problem.

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Case No(s). 19-0047-GA-ORD

Summary: Public Comment filed on behalf of Haynes Goddard, Ph.D electronically filed by
Docketing Staff on behalf of Docketing