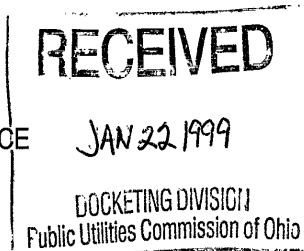


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98-1145-EL-BGN¹¹

VIA OVERNIGHT SERVICE



Cinergy Corp.
139 East Fourth Street, Rm 25 AT II
P.O. Box 960
Cincinnati, OH 45201-0960
Tel 513.287.3020
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DAVID T. MUSSELMAN
Senior Counsel

January 22, 1999

CINERGY.

Kim Wissman, Siting Officer
Ohio Power Siting Board
180 East Broad Street
Third Floor
Columbus, Ohio 43215-3793

Re: Trigen-Cinergy Solutions, LLC's Responses to The Ohio Power Siting
Board Staff's Combined Requests for Production of Documents and
Interrogatories, Second Set

Dear Ms. Wissman:

I am enclosing an original and 20 copies of Trigen-Cinergy Solutions, LLC's
Responses to The Ohio Power Siting Board Staff's Combined Requests for
Production of Documents and Interrogatories, Second Set.

If you have any questions, please call me.

Very truly yours,

A handwritten signature in dark ink, appearing to be "Leon Winget".

Enclosures

Cc: Leon Winget

This is to certify that the images appearing are an
accurate and complete reproduction of a case file
document delivered in the regular course of business.
Technician Rene M. Mj Date Processed Jan 25, 1999

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of :
of Trigen-Cinergy Solutions, LLC for a : Case No. 98-1165-EL-BGN
Certificate of Environmental :
Compatibility and Public Need :

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PUCO

**TRIGEN-CINERGY SOLUTIONS, LLC'S
RESPONSES TO THE OHIO POWER SITING BOARD STAFF'S
COMBINED REQUESTS FOR PRODUCTION OF
DOCUMENTS AND INTERROGATORIES
SECOND SET**

As a general response, Trigen-Cinergy Solutions, LLC ("T-CS") notes that it is building the proposed project on behalf of AK Steel which will operate the facility for its own use; that is, AK will operate the generation facility and will own all electricity generated. The electricity will primarily be used to supply the AK Steel facility, but to the extent there is excess electricity, it is expected that as a qualifying facility under PURPA, excess power will be sold to The Cincinnati Gas & Electric Company ("CG&E"), as the host utility, under a yet-to-be-negotiated power purchase agreement which will need to be approved by the PUCO. Thus, any excess power delivered to the grid will be owned and controlled by CG&E.

1. *Please conduct a load flow study of the 1998 summer conditions and provide the following:*
 - a. *Load flow study on a computer disk in PSLF or PSSE with area transcription diagram.*
 - b. *Discuss the transcription diagram and identify significant power flows and voltages in the area.*
 - c. *Provide simulation, transcription diagram of critical contingencies and summarize.*

RESPONSE: Objection. T-CS does not agree that modeling the impact of a unit that will not be operational until at least 2000 based on 1998 conditions will be a useful exercise. T-CS does not believe that it should incur the expense for this study.

Without waiving said objection, T-CS answers as follows:

T-CS has requested Cinergy Services, Inc. to run two scenarios for Summer 2000: one showing conditions without the project and one showing the impact on the system for the project delivering 125 MW to CG&E at AK Steel Substation

1 C. The report is expected in approximately two weeks and will be provided to the OPSB Staff.

2. *Please conduct a load flow study with the unit generating 50 MW and provide the following under 1998 summer conditions:*

- a. *Load flow study on a computer disk in PSLF or PSSE with area transcription diagram.*
- b. *Discuss the transcription diagram and identify significant power flows and voltages in the area.*
- c. *Provide simulation, transcription diagram of critical contingencies and summarize.*

RESPONSE: Objection. T-CS does not agree that modeling the impact of a unit that will not be operational until at least 2000 based on 1998 conditions will be a useful exercise. T-CS does not believe that it should incur the expense for this study.

Without waiving said objection, T-CS answers as follows:

T-CS has requested Cinergy Services, Inc. to run two scenarios for Summer 2000: one showing conditions without the project and one showing the impact on the system for the project delivering 125 MW to CG&E at AK Steel Substation

1 C. The report is expected in approximately two weeks and will be provided to the OPSB Staff.

3. *Please conduct a load flow study with the unit generating 150 MW and provide the following under 1998 summer conditions:*

- a. *Load flow study on a computer disk in PSLF or PSSE with area transcription diagram.*
- b. *Discuss the transcription diagram and identify significant power flows and voltages in the area.*
- c. *Provide simulation, transcription diagram of critical contingencies and summarize.*

RESPONSE: Objection. T-CS does not agree that modeling the impact of a unit that will not be operational until at least 2000 based on 1998 conditions will be a useful exercise. T-CS does not believe that it should incur the expense for this study.

Without waiving said objection, T-CS answers as follows:

T-CS has requested Cinergy Services, Inc. to run two scenarios for Summer 2000: one showing conditions without the project and one showing the impact on the system for the project delivering 125 MW to CG&E at AK Steel Substation

1 C. The report is expected in approximately two weeks and will be provided to the OPSB Staff.

4. *Please conduct a load flow study with the unit generating 230 MW and provide the following under 1998 summer conditions:*

- a. *Load flow study on a computer disk in PSLF or PSSE with area transcription diagram.*
- b. *Discuss the transcription diagram and identify significant power flows and voltages in the area.*
- c. *Provide simulation, transcription diagram of critical contingencies and summarize.*

RESPONSE: Objection. T-CS does not agree that modeling the impact of a unit that will not be operational until at least 2000 based on 1998 conditions will be a useful exercise. T-CS does not believe that it should incur the expense for this study.

Without waiving said objection, T-CS answers as follows:

T-CS has requested Cinergy Services, Inc. to run two scenarios for Summer 2000: one showing conditions without the project and one showing the impact on the system for the project delivering 125 MW to CG&E at AK Steel Substation 1 C. The report is expected in approximately two weeks and will be provided to the OPSB Staff.

5. *Please conduct a load flow study with the unit generating 230 MW and provide the following under 1998 summer conditions:*

Provide simulation, transcription diagram for the following conditions and summarize results.

- *50 MW power transfer to the Michigan companies*
- *150 MW power transfer to the Michigan companies*
- *230 MW power transfer to the Michigan companies*

RESPONSE: Objection. T-CS does not agree that modeling the impact of a unit that will not be operational until at least 2000 based on 1998 conditions will be a useful exercise. T-CS does not believe that it should incur the expense for this study.

Without waiving said objection, T-CS answers as follows:

T-CS has requested Cinergy Services, Inc. to run two scenarios for Summer 2000: one showing conditions without the project and one showing the impact on the system for the project delivering 125 MW to CG&E at AK Steel Substation 1 C. The report is expected in approximately two weeks and will be provided to the OPSB Staff.

6. *Do the additions of the generating unit and the transmission line have any impact on the regional transmission grid (distribution and transmission facilities).*

To justify your answer, please provide the following under 1998 summer conditions:

- a. Load flow transcription diagram without new facilities;*
- b. Load flow transcription diagram with the new facilities in service;*
- c. Analyze (a) and (b) and summarize results and show any impact on the regional grid.*

RESPONSE: Objection. T-CS does not agree that modeling the impact of a unit that will not be operational until at least 2000 based on 1998 conditions will be a useful exercise. T-CS does not believe that it should incur the expense for this study.

Without waiving said objection, T-CS answers as follows:

T-CS has requested Cinergy Services, Inc. to run two scenarios for Summer 2000: one showing conditions without the project and one showing the impact on the system for the project delivering 125 MW to CG&E at AK Steel Substation 1 C. The report is expected in approximately two weeks and will be provided to the OPSB Staff.

7. *Please conduct a load flow study of the expected 2003 summer conditions and provide the following:*

- a. Load flow study on a computer disk in PSLF or PSSE with area transcription diagram.*
- b. Discuss the transcription diagram and identify significant power flows and voltages in the area.*
- c. Provide simulation, transcription diagram of critical contingencies and summarize.*

RESPONSE: Objection. T-CS does not agree that modeling the impact of the project in 2003 will be a useful exercise. T-CS does not believe that it should incur the expense for this study.

Without waiving said objection, T-CS answers as follows:

T-CS has requested Cinergy Services, Inc. to run two scenarios for Summer 2000: one showing conditions without the project and one showing the impact on the system for the project delivering 125 MW to CG&E at AK Steel Substation 1 C. The report is expected in approximately two weeks and will be provided to the OPSB Staff.

8. *Please conduct a load flow study with the unit generating 50 MW and provide the following under expected 2003 summer conditions:*

- a. Load flow study on a computer disk in PSLF or PSSE with area transcription diagram.*

- b. *Discuss the transcription diagram and identify significant power flows and voltages in the area.*
- c. *Provide simulation, transcription diagram of critical contingencies and summarize.*

RESPONSE: Objection. T-CS does not agree that modeling the impact of the project in 2003 will be a useful exercise. T-CS does not believe that it should incur the expense for this study.

Without waiving said objection, T-CS answers as follows:

T-CS has requested Cinergy Services, Inc. to run two scenarios for Summer 2000: one showing conditions without the project and one showing the impact on the system for the project delivering 125 MW to CG&E at AK Steel Substation 1 C. The report is expected in approximately two weeks and will be provided to the OPSB Staff.

9. *Please conduct a load flow study with the unit generating 150 MW and provide the following under expected 2003 summer conditions:*

- a. *Load flow study on a computer disk in PSLF or PSSE with area transcription diagram.*
- b. *Discuss the transcription diagram and identify significant power flows and voltages in the area.*
- c. *Provide simulation, transcription diagram of critical contingencies and summarize.*

RESPONSE: Objection. T-CS does not agree that modeling the impact of the project in 2003 will be a useful exercise. T-CS does not believe that it should incur the expense for this study.

Without waiving said objection, T-CS answers as follows:

T-CS has requested Cinergy Services, Inc. to run two scenarios for Summer 2000: one showing conditions without the project and one showing the impact on the system for the project delivering 125 MW to CG&E at AK Steel Substation 1 C. The report is expected in approximately two weeks and will be provided to the OPSB Staff.

10. *Please conduct a load flow study with the unit generating 230 MW and provide the following under expected 2003 summer conditions:*

- a. *Load flow study on a computer disk in PSLF or PSSE with area transcription diagram.*
- b. *Discuss the transcription diagram and identify significant power flows and voltages in the area.*
- c. *Provide simulation, transcription diagram of critical contingencies and summarize.*

RESPONSE: Objection. T-CS does not agree that modeling the impact of the project in 2003 will be a useful exercise. T-CS does not believe that it should incur the expense for this study.

Without waiving said objection, T-CS answers as follows:

T-CS has requested Cinergy Services, Inc. to run two scenarios for Summer 2000: one showing conditions without the project and one showing the impact on the system for the project delivering 125 MW to CG&E at AK Steel Substation 1 C. The report is expected in approximately two weeks and will be provided to the OPSB Staff.

11. *Please conduct a load flow study with the unit generating 230 MW and provide the following under expected 2003 summer conditions:*

Provide simulation, transcription diagram for the following conditions and summarize results

- o 50 MW power transfer to the Michigan companies*
- o 150 MW power transfer to the Michigan companies*
- o 230 MW power transfer to the Michigan companies*

RESPONSE: Objection. T-CS does not agree that modeling the impact of the project in 2003 will be a useful exercise. T-CS does not believe that it should incur the expense for this study.

Without waiving said objection, T-CS answers as follows:

T-CS has requested Cinergy Services, Inc. to run two scenarios for Summer 2000: one showing conditions without the project and one showing the impact on the system for the project delivering 125 MW to CG&E at AK Steel Substation 1 C. The report is expected in approximately two weeks and will be provided to the OPSB Staff.

12. *Do the additions of the generating unit and the transmission line have any impact on the regional transmission grid (distribution and transmission facilities). To justify your answer, please provide the following under expected 2003 summer conditions:*

- a. Load flow transcription diagram without new facilities;*
- b. Load flow transcription diagram with the new facilities in service;*
- c. Analyze (a) and (b) and summarize results and show any impact on the regional grid.*

RESPONSE: Objection. T-CS does not agree that modeling the impact of the project in 2003 will be a useful exercise. T-CS does not believe that it should incur the expense for this study.

Without waiving said objection, T-CS answers as follows:

T-CS has requested Cinergy Services, Inc. to run two scenarios for Summer 2000: one showing conditions without the project and one showing the impact on the system for the project delivering 125 MW to CG&E at AK Steel Substation 1 C. The report is expected in approximately two weeks and will be provided to the OPSB Staff.

13. *The cooling tower, which appear to be an integral part of the cogeneration facility, seem likely to consume significant quantities of water; however, the application does not address this. In order to complete our evaluation, we need to know how much water the facility will use, where this water will come from, what impact, if any, such water use will have on the local surface and/or ground water supplies, and if there will be any resultant discharge to surface or ground water.*

RESPONSE: Objection: The cooling towers are integral to the coking process, as it is essential to cool the coking facility. Thus, the cooling tower would be necessary even if the cogeneration facility were not built. Without waiving said objection, T-CS answers as follows: The detailed engineering necessary to determine the nature of the water usage impact is not yet known. The cooling cycle will be closed cycle so that water utilization will be minimized. T-CS will supplement this answer as additional information becomes available.

14. *The Application indicates that the preferred and the alternate sites are in close proximity to residential areas and public roadways. Please provide a cooling tower plume analysis that describes and discusses environmental impacts such as fog and ice formation under critical atmospheric conditions.*

RESPONSE: Objection: The cooling towers are integral to the coking process, as it is essential to cool the coking facility. Thus, the cooling tower would be necessary even if the cogeneration facility were not built. Without waiving said objection, T-CS answers as follows: T-CS is seeking a contractor capable of performing the plume analysis. It is also in the process of determining whether sufficient engineering detail is currently available to determine whether a plume analysis can be performed at this time. T-CS agrees that a cooling tower plume analysis will be done as a part of the detailed engineering.

15. *Several site suitability concerns were raised in the application, but appear to be unresolved at this point. Specifically, the nature of the surface and subsurface materials found at the site could pose both construction and disposal problems, depending upon whether they are to be compacted and/or reused, or removed. Please clarify.*

RESPONSE: Please refer to the Application at Appendix 04-1. Additional soil investigations will be performed prior to final turbine foundation design and construction. Any excavated material will be handled consistent with applicable regulations.

In addition, should site dewatering be necessary, the resulting flows will need to be properly discharged and could require testing prior to discharge if they potentially contain toxic or otherwise harmful constituents. Please clarify.

RESPONSE: Any water which is extracted in the construction process will be handled consistent with the applicable regulations.

16. *Please describe the types of measures that will be employed during construction to control fugitive dust, storm water runoff, and other construction-related impacts.*

RESPONSE: Best control practices will be followed consistent with the Air Permit to Install which will be issued by the Ohio Environmental Protection Agency. Stormwater will be managed consistent with existing and/or modified stormwater permits.

17. *Please provide an annual report of Trigen-Cinergy Solutions. If such report is not available, please provide information describing the applicant and its corporate/business relationships.*


RESPONSE: The material requested was voluminous. One copy of each of the following was attached to the original response served upon Kim Wissman: Cinergy Corp Annual Report, Cinergy Corp. 10-K, Trigen Energy Annual Report, Trigen Energy 10-K and brochure describing Trigen-Cinergy Solutions, LLC.

18. *Identify the location of the steam pipes. If this is still not available, please indicate when you expect it will be available and provide it at such time*

RESPONSE: Steam pipes will run from approximately the middle of the coke facility to the steam turbine building and from the blast furnace gas building to the steam turbine building. Steam pipes will also run from the steam turbine building to the AK Plant for its use. Specific locations will not be known until approximately the end of 1999.


Objections

As to Objections:


David T. Musselman

Verification

The foregoing answers were prepared at my direction and under my supervision and are true and accurate to my knowledge and belief.


Thomas McNay

Certificate of Service

I certify that foregoing was served via UPS Overnight upon Kim Wissman,
Siting Officer, Ohio Power Siting Board, 180 East Broad Street, 3rd Floor,
Columbus, Ohio, 43215-3793, this 22nd day of January, 1999.

A handwritten signature in black ink, appearing to read 'DM', is written over a horizontal line.

David T. Musselman