



155 East Broad Street
20th Floor
Columbus, Ohio, 43215

o: 614-222-1330
f: 614-222-1337

November 24, 2020

Ms. Tanowa M. Troupe
Ohio Power Siting Board
PUCO Docketing Division
180 East Broad Street, 11th Floor
Columbus, OH 43215-3716

Re: Case No. 16-253-GA-BTX
Staff Report Condition No. 8 Addendum Letter for PCN

Dear Ms. Troupe:

Please find attached the addendum letter for the PCN and response from the US Army Corps of Engineers for the Central Corridor Pipeline project.

Duke Energy Ohio sets forth this communication to certify our adherence with Condition No. 8 of the OPSB's Opinion, Order and Certificate pertaining to Case No. 16-253-GA-BTX.

Please contact me if you have any questions.

Sincerely,

Emily A. Olive, CP
Paralegal

Olive, Emily A.

Subject: RE: [EXTERNAL] RE: Addendum Letter for PCN - Corps File: LRH-2020-351 Duke Energy

-----Original Message-----

From: Moore, Kyle M CIV USARMY CELRH (USA) <Kyle.M.Moore@usace.army.mil>

Sent: Monday, November 23, 2020 8:21 AM

To: Frank, Mike/CIN <Mike.Frank@jacobs.com>; Anna.Kamnyev@epa.ohio.gov

Cc: Lane, Steve <Steve.Lane@duke-energy.com>; Olberding, James H <James.Olberding@duke-energy.com>;

Flege, Adam <Adam.Flege@jacobs.com>

Subject: [EXTERNAL] RE: Addendum Letter for PCN - Corps File: LRH-2020-351 Duke Energy

*** CAUTION! EXTERNAL SENDER *** STOP & THINK! Do you know and trust this sender? Were you expecting this email? Are grammar and spelling correct? Does the content make sense? If suspicious, then do not click links, open attachments or enter your ID or password.

Good morning Mike,

Thank you for the updated project route. Since there are no changes to the proposed fill material there is no need for the Corps to issue a new verification letter. I will save the addendum to the administrative record. If any additional changes to the project are implemented please let me know.

Thank you,

Kyle Moore
U.S. Army Corps of Engineers
Huntington District
Cincinnati Field Office
10557 McKelvey Road
Cincinnati, OH 45240
Office:513-825-3444
Cell:606-202-0861

-----Original Message-----

From: Frank, Mike/CIN <Mike.Frank@jacobs.com>

Sent: Friday, November 20, 2020 3:34 PM

To: Moore, Kyle M CIV USARMY CELRH (USA) <Kyle.M.Moore@usace.army.mil>;

Anna.Kamnyev@epa.ohio.gov

Cc: Lane, Steve <steve.lane@duke-energy.com>; james.olberding@duke-energy.com; Flege, Adam

<Adam.Flege@jacobs.com>

Subject: [Non-DoD Source] RE: Addendum Letter for PCN - Corps File: LRH-2020-351 Duke Energy

Hello Kyle and Anna,

On behalf of Duke Energy Ohio, Inc., please find attached an addendum letter regarding the PCN for Duke Energy's Central Corridor Pipeline Project. The letter and attached map describes and illustrates some recent pipeline route adjustments that were necessary due to property owner requests and minor changes to avoid conflicts with other utilities.

Please note that none of the route adjustments change the quantities or extent of impacts to wetlands or waterbodies as reported in Duke's PCN filed with the Corps' on June 5, 2020.

Under separate cover, I will send you our addendum report submitted to Ohio SHPO documenting cultural resource investigations along these adjustment areas (no impacts to cultural resources are anticipated).

Please let us know if any additional information is needed.

Best Regards,

Mike A. Frank | JACOBS | Project Manager | 513.900.7738 mobile | 2 Crowne Point Court, Cincinnati, OH

-----Original Message-----

From: Moore, Kyle M CIV USARMY CELRH (USA) <Kyle.M.Moore@usace.army.mil>

Sent: Wednesday, October 14, 2020 4:04 PM

To: Frank, Mike/CIN <Mike.Frank@jacobs.com>; Lane, Steve <steve.lane@duke-energy.com>; james.olberding@duke-energy.com

Subject: [EXTERNAL] RE: Corps File: LRH-2020-351 Duke Energy

Good afternoon Folks,

Attached is the NWP 39 verification letter and completion certification for the above project. Once the project is complete please sign and return the completion certification to me electronically. If you have any questions let me know.

Thank you,

Kyle Moore

U.S. Army Corps of Engineers

Huntington District

Cincinnati Field Office

10557 McKelvey Road

Cincinnati, OH 45240

Office:513-825-3444

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Olive, Emily A.

From: Frank, Mike/CIN <Mike.Frank@jacobs.com>
Sent: Friday, November 20, 2020 3:34 PM
To: Moore, Kyle M CIV USARMY CELRH (USA); Anna.Kamnyev@epa.ohio.gov
Cc: Lane, Steve; Olberding, James H; Flege, Adam
Subject: [EXTERNAL] RE: Addendum Letter for PCN - Corps File: LRH-2020-351 Duke Energy
Attachments: PCN Addendum_NWP 39_Duke_Central Corridor Project_11-20-2020.pdf

***** CAUTION! EXTERNAL SENDER *** STOP & THINK! Do you know and trust this sender? Were you expecting this email? Are grammar and spelling correct? Does the content make sense? If suspicious, then do not click links, open attachments or enter your ID or password.**

Hello Kyle and Anna,

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Please note that none of the route adjustments change the quantities or extent of impacts to wetlands or waterbodies as reported in Duke's PCN filed with the Corps' on June 5, 2020.

Under separate cover, I will send you our addendum report submitted to Ohio SHPO documenting cultural resource investigations along these adjustment areas (no impacts to cultural resources are anticipated).

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Thank you,

Kyle Moore
U.S. Army Corps of Engineers
Huntington District
Cincinnati Field Office
10557 McKelvey Road
Cincinnati, OH 45240
Office:513-825-3444

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November 20, 2020

Mr. Kyle Moore
U.S. Army Corps of Engineers, Huntington District Regulatory Branch (OR-F)
10557 McKelvey Road
Cincinnati, OH 45240
Ph: 513-825-3444

Subject: Addendum Letter to the Pre-Construction Notification under Section 404 Nationwide Permit No. 39, Duke Energy C314V Central Corridor Pipeline Extension Project, Hamilton County, OH; LRH-2020-351-OHR-Mill Creek

Dear Mr. Moore:

On behalf of Duke Energy Ohio, Inc. (Duke), Jacobs Engineering Group, Inc. (Jacobs) is submitting this addendum to Duke's Pre-Construction Notification (PCN) for the subject Project. The Corps of Engineers' authorized the Project on October 14, 2020 with issuance of the Nationwide Permit No. 39 Verification letter. The Project involves the installation of approximately 13 miles of new 20-inch natural gas pipeline near Cincinnati, Ohio.

The purpose of this addendum letter is to inform the Corps of Engineers' of Duke's planned modifications to the pipeline route alignment. Please note that none of the route adjustments change the quantities or extent of impacts to wetlands or waterbodies as reported in Duke's PCN filed with the Corps' on June 5, 2020. The route adjustments were made at the request of several property owners with whom Duke is in the process of, or has finalized, easement agreements for the installation, operation and maintenance of the pipeline. Additionally, some adjustments were the result of the final detailed engineering process where revisions were necessary to avoid conflicts with existing utility lines.

The revised Project alignment is depicted on the attached Project Plan and Water Resources Map (Figure 1), including the Project alignment from June 5, 2020 (PCN date) for comparison.

Jacobs also evaluated the revised route alignment with respect to compliance with Section 7 obligations under the Endangered Species Act. Based on the minor nature of the route adjustments, and the fact that there are no resulting changes to the impacts to potential habitat for federally-threatened or endangered bat species, no additional bat studies are warranted in the opinion of the Duke's project ecological team. The sites that were selected for the acoustical survey (performed in July 2020) provide an applicable coverage up to 0.5 kilometer from the survey site for purposes of determining presence/absence of federally-listed endangered Indiana bats (*Myotis sodalis*) and federally-listed threatened northern long-eared bat (*Myotis septentrionalis*). Additionally, as there are no changes to the impacts to potential habitat for federally-listed endangered mussel species and Running buffalo clover, no additional survey work is warranted.

Concerning compliance with the National Historic Preservation Act and applicable state and local laws and regulations, Jacobs has investigated each location where the proposed route alignment has shifted outside the original Phase I cultural resources survey area for archaeological resources (completed June 2020). A letter report (Addendum I, Phase I Archaeological Reconnaissance) is being provided to the Corps' under separate cover. No additional cultural resource work is



November 20, 2020

recommended based on the negative findings from the additional cultural resource surveys (completed in August 2020).

Duke and Jacobs believe that the scope and nature of these route adjustments have no bearing on the Corp's NWP No. 39 Verification and authorization as described in your October 14, 2020 letter. We would greatly appreciate your comments or acknowledgment regarding this letter. Please contact Mike Frank with Jacobs at 513-900-7738 and mike.frank@jacobs.com or Steve Lane with Duke Energy Ohio at 513-477-1908 and steve.lane@duke-energy.com with any questions or if you require additional information.

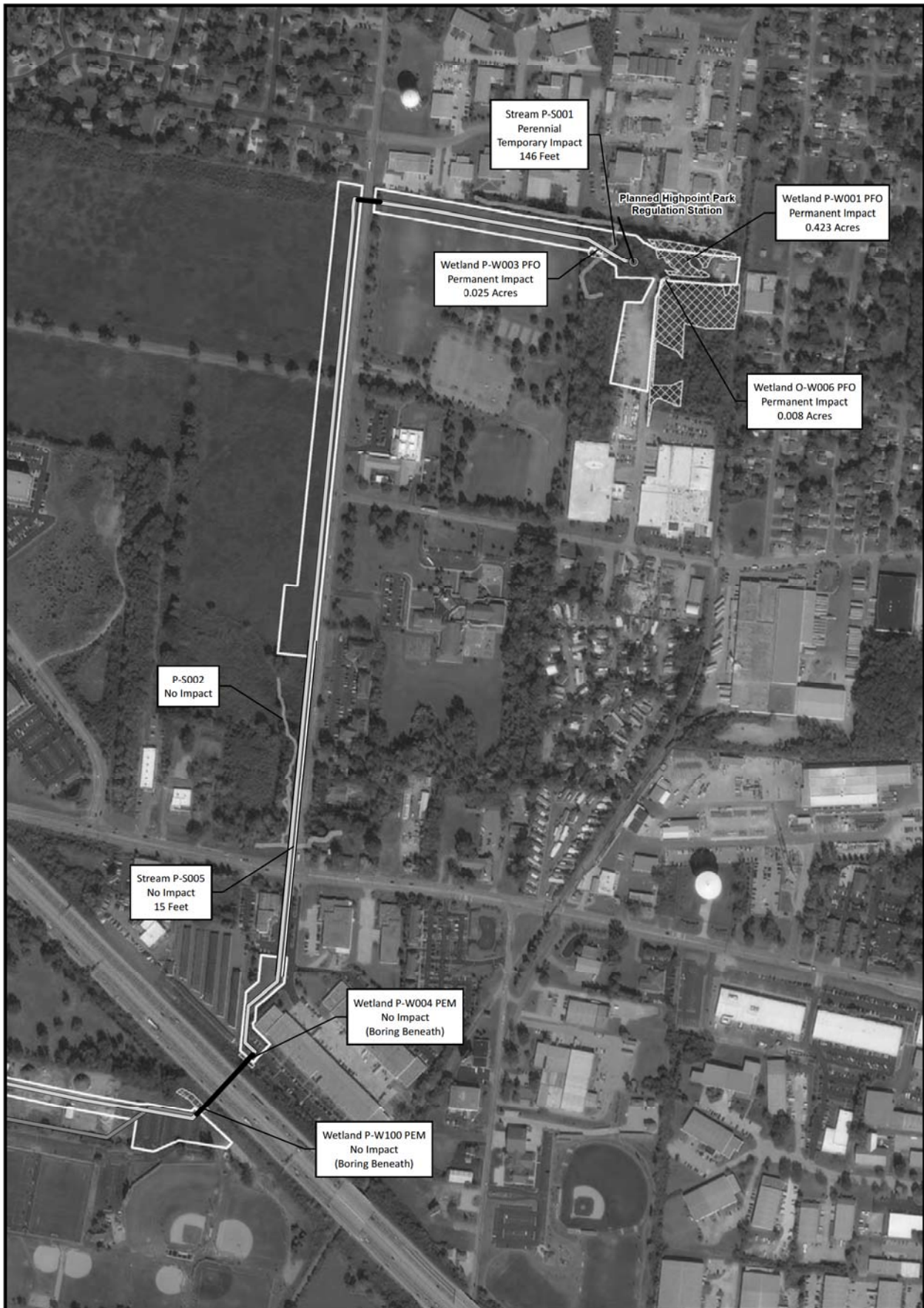
Sincerely
Jacobs Engineering Group, Inc.

A handwritten signature in black ink that reads "Mike Frank".

Mike A. Frank
Project Manager

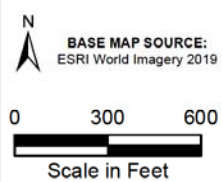
Enclosed: Map Figure

Copies to: Anna Kamnyev, Ohio Environmental Protection Agency Division of Surface Water
James Olberding, Senior Project Manager Gas Operations; Duke Energy
Stephen R. Lane, Lead Environmental Scientist/Planner; Duke Energy



LEGEND:

- Regulation Station
- Proposed Amended Certificated Route
- - - Former Route (6/5/2020)
- ▬ Construction Work Area
- ▬ Bore Location
- ▬ HDD Location
- ▬ Delineated Stream
- ▬ Delineated Wetland
- ▬ PEM
- ▬ PFO
- ▬ PSS
- ▬ Delineated Pond



C314V Central
Corridor Pipeline
Extension Project

FIGURE 1 - 1
PROJECT PLAN AND
WATER RESOURCES

PN: 672247

DATE: 11/19/2020

CREATED BY: RD

REVIEWED BY: MF

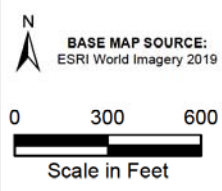




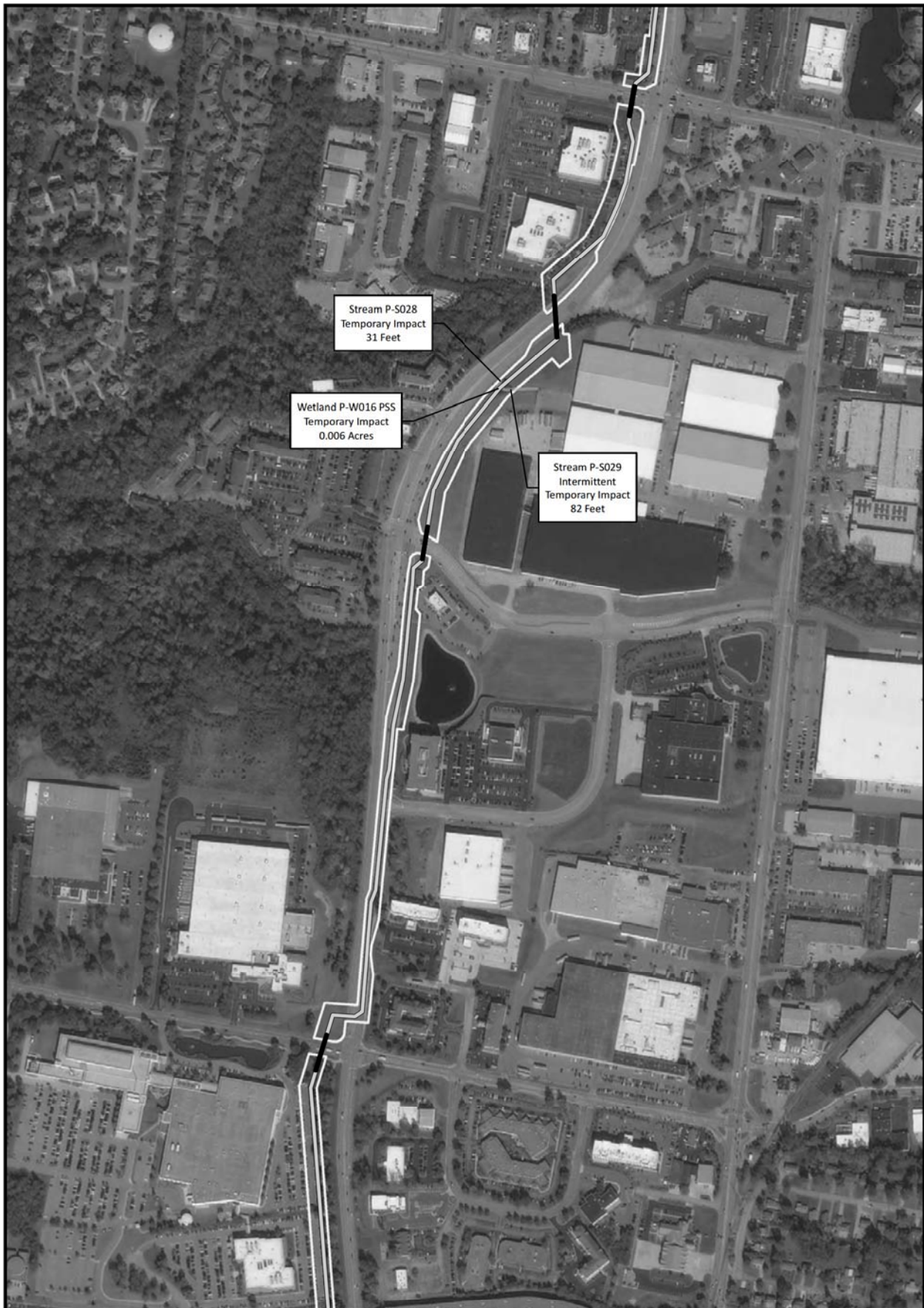
Stream P-S030
Intermittent
Temporary Impact
61 Feet

LEGEND:

- Regulation Station
- Proposed Amended Certificated Route
- Former Route (6/5/2020)
- Construction Work Area
- Bore Location
- HDD Location
- Delineated Stream
- Delineated Wetland
- ▨ PEM
- ▨ PFO
- ▨ PSS
- Delineated Pond

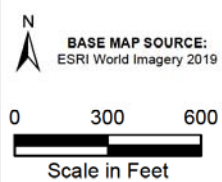


	C314V Central Corridor Pipeline Extension Project
FIGURE 1 - 2 PROJECT PLAN AND WATER RESOURCES	
PN: 672247	DATE: 11/19/2020
CREATED BY: RD	Jacobs
REVIEWED BY: MF	



LEGEND:

- | | |
|---------------------------------------|----------------------|
| ● Regulation Station | ▭ Delineated Stream |
| — Proposed Amended Certificated Route | ▭ Delineated Wetland |
| — Former Route (6/5/2020) | ▨ PEM |
| — Construction Work Area | ▨ PFO |
| — Bore Location | ▨ PSS |
| — HDD Location | ▭ Delineated Pond |



C314V Central Corridor Pipeline Extension Project

FIGURE 1 - 3
PROJECT PLAN AND
WATER RESOURCES

PN: 672247

DATE: 11/19/2020

CREATED BY: RD

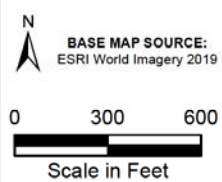
REVIEWED BY: MF





LEGEND:

- Regulation Station
- Proposed Amended Certificated Route
- Former Route (6/5/2020)
- Construction Work Area
- Bore Location
- HDD Location
- ▭ Delineated Stream
- ▭ Delineated Wetland
- ▨ PEM
- ▨ PFO
- ▨ PSS
- ▭ Delineated Pond



C314V Central
Corridor Pipeline
Extension Project

FIGURE 1 - 4
PROJECT PLAN AND
WATER RESOURCES

PN: 672247 DATE: 11/19/2020

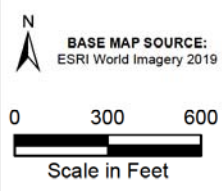
CREATED BY: RD
REVIEWED BY: MF





LEGEND:

- Regulation Station
- Proposed Amended Certificated Route
- Former Route (6/5/2020)
- Construction Work Area
- Bore Location
- HDD Location
- Delineated Stream
- Delineated Wetland
- ▨ PEM
- ▨ PFO
- ▨ PSS
- Delineated Pond



	C314V Central Corridor Pipeline Extension Project
<p>FIGURE 1 - 5 PROJECT PLAN AND WATER RESOURCES</p>	
PN: 672247	DATE: 11/19/2020
CREATED BY: RD	Jacobs
REVIEWED BY: MF	



Stream G-SRH01
No Impact
34 Feet

LEGEND:

- Regulation Station
- Proposed Amended Certified Route
- Former Route (6/5/2020)
- Construction Work Area
- Bore Location
- HDD Location
- Delineated Stream
- Delineated Wetland
- ▨ PEM
- ▨ PFO
- ▨ PSS
- Delineated Pond



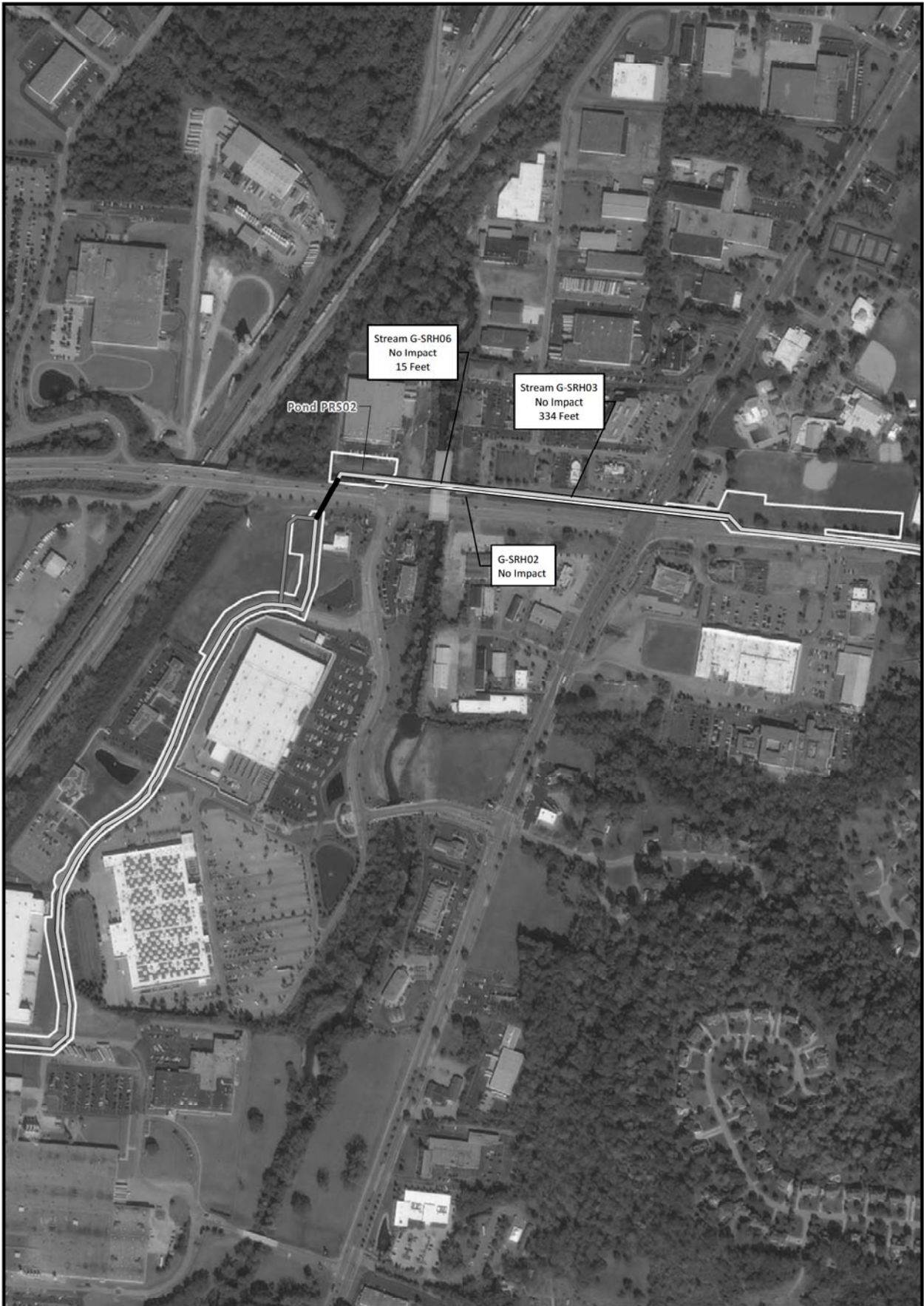
BASE MAP SOURCE:
ESRI World Imagery 2019

N

0 300 600

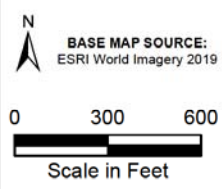
Scale in Feet

	C314V Central Corridor Pipeline Extension Project
FIGURE 1 - 6 PROJECT PLAN AND WATER RESOURCES	
PN: 672247	DATE: 11/19/2020
CREATED BY: RD	Jacobs
REVIEWED BY: MF	

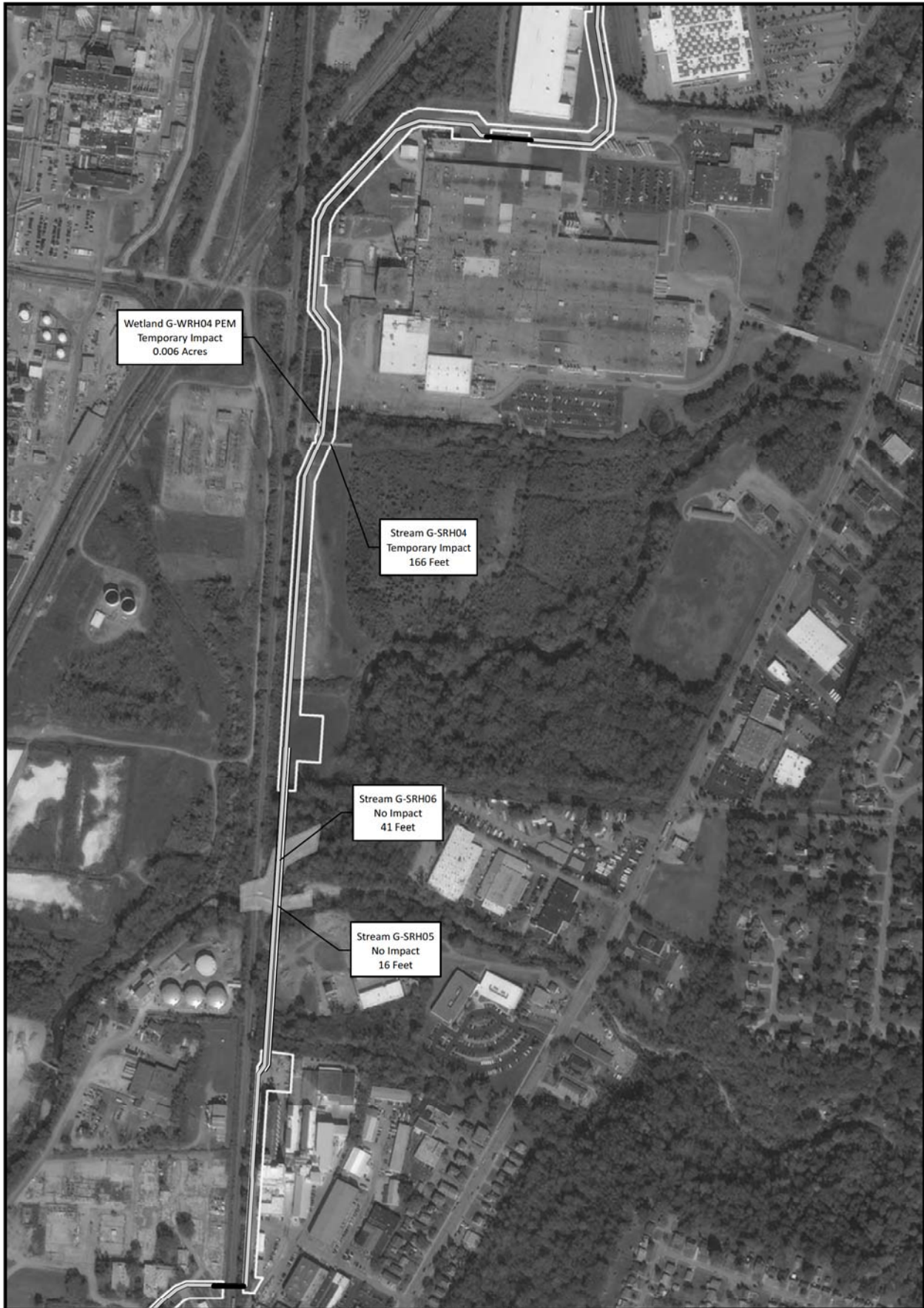


LEGEND:

- Regulation Station
- Proposed Amended Certificated Route
- Former Route (6/5/2020)
- Construction Work Area
- Bore Location
- HDD Location
- ▭ Delineated Stream
- ▭ Delineated Wetland
- ▭ PEM
- ▭ PFO
- ▭ PSS
- ▭ Delineated Pond

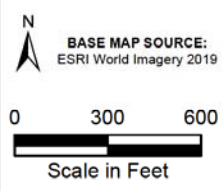


	C314V Central Corridor Pipeline Extension Project
FIGURE 1 - 7 PROJECT PLAN AND WATER RESOURCES	
PN: 672247	DATE: 11/19/2020
CREATED BY: RD	Jacobs
REVIEWED BY: MF	



LEGEND:

- | | |
|------------------------------------|----------------------|
| ● Regulation Station | ▬ Delineated Stream |
| ▬ Proposed Amended Certified Route | ▬ Delineated Wetland |
| ▬ Former Route (6/5/2020) | ▨ PEM |
| ▬ Construction Work Area | ▨ PFO |
| ▬ Bore Location | ▨ PSS |
| ▬ HDD Location | ▬ Delineated Pond |

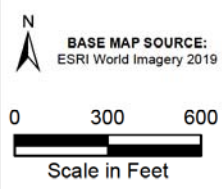


	C314V Central Corridor Pipeline Extension Project
FIGURE 1 - 8 PROJECT PLAN AND WATER RESOURCES	
PN: 672247	DATE: 11/19/2020
CREATED BY: RD	Jacobs
REVIEWED BY: MF	



LEGEND:

- Regulation Station
- Proposed Amended Certificated Route
- Former Route (6/5/2020)
- Construction Work Area
- Bore Location
- HDD Location
- ▭ Delineated Stream
- ▭ Delineated Wetland
- ▨ PEM
- ▨ PFO
- ▨ PSS
- ▭ Delineated Pond



C314V Central Corridor Pipeline Extension Project

**FIGURE 1 - 9
PROJECT PLAN AND
WATER RESOURCES**

PN: 672247
CREATED BY: RD
REVIEWED BY: MF

DATE: 11/19/2020

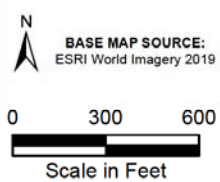




Stream G-SRH08
Intermittent
Temporary Impact
92 Feet

LEGEND:

- Regulation Station
- Proposed Amended Certificated Route
- Former Route (6/5/2020)
- Construction Work Area
- Bore Location
- HDD Location
- Delineated Stream
- Delineated Wetland
- ▨ PEM
- ▨ PFO
- ▨ PSS
- Delineated Pond



C314V Central
Corridor Pipeline
Extension Project

FIGURE 1 - 10
PROJECT PLAN AND
WATER RESOURCES

PN: 672247
CREATED BY: RD
REVIEWED BY: MF

DATE: 11/19/2020

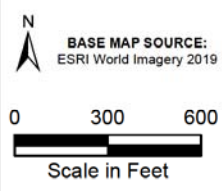




Stream G-5404
No Impact
51 Feet

LEGEND:

- Regulation Station
- Proposed Amended Certificated Route
- Former Route (6/5/2020)
- Construction Work Area
- Bore Location
- HDD Location
- Delineated Stream
- Delineated Wetland
- ▨ PEM
- ▨ PFO
- ▨ PSS
- Delineated Pond

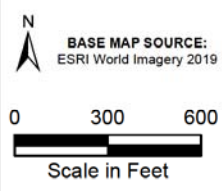


	C314V Central Corridor Pipeline Extension Project
FIGURE 1 - 11 PROJECT PLAN AND WATER RESOURCES	
PN: 672247	DATE: 11/19/2020
CREATED BY: RD	Jacobs
REVIEWED BY: MF	



LEGEND:

- Regulation Station
- Proposed Amended Certificated Route
- Former Route (6/5/2020)
- Construction Work Area
- Bore Location
- HDD Location
- ▭ Delineated Stream
- ▭ Delineated Wetland
- ▨ PEM
- ▨ PFO
- ▨ PSS
- ▭ Delineated Pond



	C314V Central Corridor Pipeline Extension Project
FIGURE 1 - 12 PROJECT PLAN AND WATER RESOURCES	
PN: 672247	DATE: 11/19/2020
CREATED BY: RD	Jacobs
REVIEWED BY: MF	