

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of Vectren)	
Energy Delivery of Ohio, Inc. for a Certificate)	
of Environmental Compatibility and Public Need)	Case No. 13-1651-GA-BTX
for its Dayton Airport Z-167 Pipeline Rerouting)	
Project)	

REPLY TO PETITION TO INTERVENE AND REQUEST FOR HEARING

Pursuant to Ohio Administrative Code (“OAC”) Rule 4906-7-12(B)(1), Vectren Energy Delivery of Ohio, Inc. (“Vectren”) respectfully submits a reply to the Ohio Power Siting Board (“Board”) in response to The City of Dayton’s (“Dayton”) Petition for Leave to Intervene and Request for Hearing (“Petition”) and Memorandum in Support (“Memo”), filed in the above-captioned proceeding on October 2, 2013. While Vectren does not oppose Dayton’s Petition, Vectren submits this reply for the following reasons: first, to indicate that Vectren does not object to intervention by Dayton (obviating the need for any hearing on that request) and, secondly, to clarify the record on certain assertions contained in Dayton’s Petition and Supporting Memorandum. Vectren’s reply and reasons for opposition to Dayton’s request for hearing are set forth in the Memorandum in Support, below.

MEMORANDUM IN SUPPORT

On September 20, 2013, Vectren initiated this proceeding by filing an Application for Certificate for Environmental Compatibility and Public Need (“Application”) for its Dayton Airport Z-167 pipeline rerouting project (“Project”). On October 2, 2013, Dayton filed its Petition. Vectren does not oppose Dayton’s Petition filed to pursuant to OAC Rule 4906-7-04.

I. REPLY TO DAYTON'S PETITION

Because the statement of facts submitted by Dayton may be the result of simple miscommunication, Vectren provides the attached (Attachment A) digest of Vectren contacts with representatives of the City of Dayton and the Dayton International Airport ("DIA"). That digest documents contacts that began when the Vectren project was in its initial planning phase, and activities that continue.

A. Vectren's Commitment to Work with Dayton and Other Local Governments and Governmental Agencies

Vectren prizes its good working relationships with the City of Dayton and other local governments and governmental agencies. And, as part of Vectren's efforts to foster and augment those relationships, Vectren commits to include counsel in future meetings with Dayton officials.

B. Vectren's Route Study Process and Assessment of Dayton Proposals

Vectren's proposed preferred and alternate routes are the result of a route selection process taking into account, both quantitatively and qualitatively, the minimization of environment, cultural, land-use, and engineering and construction impacts. Application Appendix 3-1. And, Vectren is currently in the process of assessing alternative routes recommended by Dayton. Vectren anticipates additional communication with Dayton, including counsel for Dayton, on those alternatives, as well. Indeed, Vectren is communicating with Dayton, other leaders of local communities near the Project, and affected property owners and will continue to do so during this Project.

Vectren's Application established that the impacts to Dayton's property will be minimal. Vectren does not anticipate the need to remove any existing structures, and no temporary or permanent access roads will be required to construct or maintain the proposed natural gas pipeline. Application, p. 1-5. Once in place, the relocated pipeline will have no aesthetic impact beyond the required line-of-sight pipeline markers. *Id.* In areas of the route where there may be

some temporary damage to drainage tiles and compaction of soil, Vectren will repair the tile and restore the topsoil. *Id.*

Vectren's studies included a review of the 2012 Montgomery County Comprehensive Plan and the DIA Master Plan for Project compatibility, and no incompatibilities between the Projects and these published planning documents were identified. Application, p. 6-17. At the community meeting on August 29, 2013, Vectren's President, project manager and counsel all met privately with one of DIA's officials to resolve the only issues that had been raised concerning the proposed route's proximity to one of the airport's runways.

Overall, the Project is anticipated to have a positive impact on the local economy because the labor for construction of the pipeline will largely be drawn from local sources. Application, p. 1-5. Local industry will also benefit from the increased reliability in the natural gas supply. Application, p. 6-17. Additionally, no road closures, lane closures, road access restrictions, or traffic controls are anticipated for the construction of the pipeline. Application, p. 4-9.

Staging areas for the project will depend on the route ultimately selected. Regardless of the route selected, any staging areas will have the necessary ecological and cultural surveys performed on them and will be shown on the construction drawing for the Project; these plans will be submitted to the Board once the plans are completed. Application, p. 4-6.

Vectren has given close consideration to its plan to "abandon in place" current pipeline which will no longer be in service after this Project is completed. Vectren previously provided Dayton officials a white paper highlighting Vectren's studies on the long-term effects of abandoned pipelines and demonstrating that the abandoned pipeline will not create a negative condition for the runway and committed to including that document in official correspondence.

C. Key Distinctions Between the Preferred Route and the Alternative Route

Vectren would most respectfully submit that a clarification on the "Preferred Route" and the "Alternate Route" may be helpful for all parties. The distinction is important, as each

potential route was the result of a careful and robust site selection process. In its Application, Vectren is requesting that the Board approve only the Preferred Route. To be clear, if the Board approves Vectren's Preferred Route, as Vectren requests, approximately 34% of the route will be on Dayton's property. If the Board selects Vectren's proposed Alternate Route instead, 56% of the route will be on Dayton's property.

D. Necessity of the Vectren Project

Vectren has shown this Project's necessity. The purpose for the proposed relocation of the pipeline is to increase public safety, especially for the thousands of members of the public who visit or work at DIA, by moving the pipeline to a lower density location. Application, p. 1-1. This Project will also increase safety of Vectren employees who are currently responsible for performing integrity management assessments within the airport fence, reduce pipeline maintenance costs, and eliminate cased crossings. *Id.* These reasons for the project's necessity were directly communicated in a letter to Dayton officials:

The current transmission pipeline runs through the middle of the airport, crossing multiple taxiways as well as the main runway. Enhanced pipeline safety regulations require more frequent, invasive testing and assessments cannot be completed efficiently and/or effectively with the pipeline in its current location.

Application Appendix 6-2.

As stated above, and throughout Vectren's Application, the pipeline runs through DIA's boundaries and under runways. The relocation of the pipeline around the west side of DIA would alleviate the current situation of a pipeline located in a high consequence area. Application, p. 1-2. In the unlikely event of an emergency involving the current pipeline, the surrounding area would need to be evacuated, and travelers and others at DIA would be affected. *Id.* Additionally, Vectren personnel responding to the emergency would face increased risk due to the current location of the pipeline within DIA's boundaries. *Id.*

II. CONCLUSION

For all the foregoing reasons, Vectren has no objection to intervention by the City of Dayton, and Vectren reiterates its commitment to work with the City of Dayton in this process.

Respectfully submitted on behalf of
VECTREN ENERGY DELIVERY OF OHIO, INC.



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Reply to Petition to Intervene and Request for Hearing has been served upon the following parties listed below by electronic mail, this 16th day of October 2013.



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APPENDIX A

The table below is a non-exhaustive list of the communications between Vectren Energy Delivery of Ohio (“Vectren”) and Dayton and/or Dayton International (“DIA”) officials, executives, and engineers concerning Vectren’s Dayton Airport Z-167 pipeline rerouting project (“Project”).

Date	Description of Communication Between Vectren and Dayton/DIA
May 15, 2013	Vectren engineer sends DIA senior engineer proposed pipeline routes
May 24, 2013	Vectren engineer sends follow-up communication to DIA senior engineer requesting comments regarding the proposed routes
June 5, 2013	Vectren engineer sends DIA senior engineer route revisions
June 22, 2013	Vectren President discusses Project with Dayton Assistant City Manager
June 27, 2013	Vectren President sends DIA Director of Aviation and DIA Director of Business Development Project details, including proposed route(s), requesting a meet in order to discuss additional Project details
June 28, 2013	Vectren President discusses Project, including proposed routes, with DIA Director of Aviation and DIA Business Development Manager; no concerns about the Project are raised by the DIA executives at this time
July 1, 2013	Vectren President sends DIA Director of Aviation and DIA Business Development Director white paper addressing issues related to abandoned pipelines
July 23, 2013	Vectren President sends DIA Director of Aviation status update of the Project
July 24, 2013	Vectren President invites Dayton elected officials to August 29, 2013 public meeting
August 7, 2013	Vectren President sends additional correspondence to DIA executives
August 14, 2013	Vectren sends letter inviting multiple DIA and Dayton officials to the public meeting for the Project
August 15, 2013	Vectren publishes information concerning public meeting for the Project in the <i>Dayton Daily News</i>
August 21, 2013	Vectren senior engineer communicates with DIA Deputy Director of Aviation regarding potential route issues around DIA’s long-term planning
August 22, 2013	Vectren President meets with DIA Director of Aviation and DIA Business Development Director to discuss the DIA’s long-term planning issues and the proposed route
August 27, 2013	Vectren President meets with DIA Director of Aviation and DIA Director of Business Development
August 28, 2013	Vectren President meets with DIA executives
August 29, 2013	At the community meeting Vectren’s president met privately with a DIA official to resolve the one issue that was raised with respect to DIA’s future planning.
September 9, 2013	Vectren President receives communication from Montgomery County official requesting a meeting with Vectren to discuss potential alternative routes for the Project
September 11, 2013	Vectren President responds to Montgomery County official’s request (above)
September 19, 2013	Vectren coordinates meeting time with Montgomery County official to discuss other route options
October 1, 2013	Vectren meets with DIA and Montgomery County (along with other stakeholders) to discuss alternate routes close to DIA

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Summary: Reply of Vectren Energy Delivery of Ohio, Inc. to the City of Dayton's Petition to Intervene and Request for Hearing electronically filed by Teresa Orahod on behalf of Sally Bloomfield