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**Data Requests and Interrogatories,
Z-167 Pipeline Replacement/ Vectren Energy Delivery of Ohio, Inc.**

December 17, 2013

1. What would be the process to address damage to an existing septic system caused by construction, operation, or maintenance of the project?
2. Would the acreage of any Agricultural District lands be changed as a result of this project?
3. What is the proposed road crossing method?
4. Approximately how many acres of vegetation / trees would need to be cleared for the Preferred and the Alternate routes?
5. Original narrative describing the overlapping segments of the preferred and alternate routes:

"The Preferred and Alternate Routes start on the south side of the airport off Corporate Center Drive near the Vandalia Range and Armory. They follow along the south side of Corporate Center Drive for approximately 520 feet and cross the road heading northwest, running along the south side of the Airport Inn and Parking, for approximately 820 feet. They then head southwest, utilizing properties owned by the City of Dayton, for roughly 1,190 feet where they cross Peters Pike and a concrete lined ditch. They continue west for approximately 3,370 feet, where they cross under the Dayton International Airport Access Road. The routes then head south and turns back west, paralleling property lines and following alongside woodlots, for 4,205 feet and then cross Dog Leg Road. The routes continue heading west for approximately 1,320 feet and cross an Unnamed Tributary to Stillwater River. The routes continue west for another 2,026 feet following along parcel boundaries and tree lines for approximately 2,800 feet, where they cross a second Unnamed Tributary to Stillwater River. After crossing the tributary they continue another 815 feet before turning north and crossing National Road. The route turns west after crossing National Road and follows along the north side of road through a woodlot for 2,040 feet. It turns north at the parcel boundary for 1,400 feet and then turns northeast after emerging from the woodlot. The route runs for approximately 7,650 feet through two agricultural fields and crosses Jackson Road and Dog Leg Road where it is directed back to the north to run along the western edge of the airport's security fence for approximately 1,460 feet to Old Springfield Road. This is the point where the two routes change direction from each other."

Many of the lengths in the common route description appear to be incorrect. For example, in the underlined portion above, the length of the segment described is listed as 3,370 feet; however, when measured on our Google Earth map, the length is approximately 2,650

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feet. Please verify all of the lengths of the various segments of the common route and provide an updated description that reflects any changes.

6. Original narrative describing the non-overlapping segments of the alternate route:

"The Alternate Route continues north, crossing Old Springfield Road following along the eastern edge of a wooded residential area, in an agricultural field, for approximately 3,030 feet. It changes direction to the east, at the parcel boundary line, for roughly 1,379 feet and crosses Mill Creek. After crossing Mill Creek, the Route continues following along the south side of a woodlot for approximately 2,525 feet. The route then changes direction northward for roughly 3,300 feet and crosses Brush Creek, south of North County Line Road. The route turns east, following along the south side of North County Line Road, for approximately 1,725 feet, where it crosses Peters Pike. After crossing Peters Pike the Preferred Route continues for approximately another 3,470 feet until it connects back in with the existing Z-167 pipeline."

Based on simply looking at the non-overlapping alternate route segments on the maps, it is clear that the alternate route turns west as soon as it splits from the preferred route path, instead of continuing north across Old Springfield Road, as underlined above. So, since the description of the non-overlapping alternate route begins incorrectly, it calls into question the accuracy of the description and the segment lengths listed therein. Please provide an updated description, including verified/corrected segment lengths, of the non-overlapping alternate route segments.

7. The amended application states that the preferred route is 7.00 miles in length, and the route selection study states that the preferred route (Route B) is 6.61 miles in length. Likewise, the amended application states that the alternate route is 7.75 miles in length, and the route selection study states that the alternate route (Route D) is 7.18 miles in length. Please verify the overall route lengths and explain these discrepancies.