

**BEFORE**

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of )  
Duke Energy Ohio, Inc., for an ) Case No. 14-0375-GA-RDR  
Adjustment to Rider MGP Rates. )

In the Matter of the Application of )  
Duke Energy Ohio, Inc., for Tariff ) Case No. 14-0376-GA-ATA  
Approval. )

## DIRECT TESTIMONY OF

**JESSICA L. BEDNARCIK**

**ON BEHALF OF**

**DUKE ENERGY OHIO, INC.**

March 31, 2014

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**I. INTRODUCTION AND PURPOSE**

1   **Q.    PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2    A.    My name is Jessica Lyn Bednarcik, and my business address is 526 South Church  
3           Street, Charlotte, North Carolina 28202.

4   **Q.    BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

5    A.    I am employed by Duke Energy Business Services LLC (DEBS) as the Manager  
6           of the Remediation and Decommissioning Group, which is part of Environmental  
7           Services at Duke Energy Corporation (Duke Energy). DEBS provides various  
8           administrative and other services to Duke Energy Ohio, Inc., (Duke Energy Ohio  
9           or Company) and other affiliated companies of Duke Energy.

10  **Q.    PLEASE    BRIEFLY    SUMMARIZE    YOUR    EDUCATIONAL**  
11  **BACKGROUND AND PROFESSIONAL EXPERIENCE.**

12  A.    I received my Bachelor of Science degree in Chemical Engineering from Clemson  
13           University, located in Clemson, South Carolina, on May 11, 2001. From 2001-  
14           2002, as an Associate Engineer for Duke/Fluor Daniel (Charlotte, NC), I designed  
15           processes for new combined cycle power generation plants, with a focus on water  
16           treatment. From 2003-2004, as an Associate Engineer for Southerland Associates  
17           (Charlotte, NC), I worked on numerous design engineering projects. From 2004-  
18           2005, as an Associate Engineer for WPC, Inc. (Charlotte, NC), my responsibilities  
19           included environmental compliance and design, including Phase I Environmental  
20           Site Assessments; Underground Storage Tank Remediation projects; development  
21           of Spill Prevention, Control and Countermeasure Plans and Storm Water  
22           Pollution Prevention Plans; and Air Permits applications. I am a registered

1 Professional Engineer in North Carolina and South Carolina.

2 In 2005, I joined the Environmental Engineering group at Duke Energy,  
3 which became the Waste and Remediation Management Group after the Duke  
4 Energy merger with Cinergy Corp. in 2006. I have handled a number of different  
5 projects and have extensive experience with site investigation and remediation  
6 projects. I also have considerable experience in the investigation and remediation of  
7 manufactured gas plant (MGP) sites through my work at Duke Energy and other  
8 organizations. In 2013, after the merger with Progress Energy, I became the  
9 Manager of the Remediation and Decommissioning Group at Duke Energy.

10 I have served as Duke Energy's representative on the Electric Power  
11 Research Institute (EPRI) Program 50: MGP Site Management Committee and am  
12 still an active member. I was on the steering team of EPRI's 2010 and 2013 MGP  
13 Symposiums. I am Duke Energy's representative on the Utility Solid Waste Action  
14 Group, Remediation Response Committee, where I serve on the following Issue  
15 Teams: MGP Survey/Communication Team, Due Diligence, Polycyclic Aromatic  
16 Hydrocarbons Risk Analysis, Soil Vapor Intrusion, and Continuing Obligations. I  
17 am the chair of the MGP Consortium, a group comprised of twenty-eight utilities  
18 where lessons learned and best practices are shared among utility project managers.  
19 I am also chair of the North Carolina MGP Group.

20 **Q. PLEASE DESCRIBE YOUR RESPONSIBILITIES AS MANAGER OF**  
21 **THE REMEDIATION AND DECOMMISSIONING GROUP.**

22 A. As Manager of the Remediation and Decommissioning Group, I oversee  
23 employees who provide project management and technical oversight for Duke

1 Energy's environmental liabilities at power plants and other properties that any  
2 Duke Energy entity or predecessor company either owned, operated, and/or sent  
3 material to and that is now subject to remediation obligations; these projects  
4 include former MGPs. I also continue to serve as a project manager for a number  
5 of remediation sites, many of which are former MGP sites.

6 The job responsibilities for me and the other project managers in my group  
7 include interaction and coordination with many different groups within and  
8 outside of Duke Energy, including: senior leadership; legal; finance; business  
9 units such as gas operations and transmission, power delivery, and generation;  
10 ratepayers and community groups; local, state, and federal governmental or  
11 regulatory officials; and consultants, contractors, and site/construction workers.  
12 We prepare bid documents that detail Duke Energy's requirements and  
13 expectations for remedial work and provide the technical evaluation of proposals.  
14 During the execution of site work, we actively review, comment on, and approve  
15 all plans, scope or design changes, and final documents prepared by  
16 environmental consultants. We regularly visit sites during active investigation  
17 and remediation activities in order to oversee work and ensure that Duke Energy's  
18 expectations are being met.

19 **Q. HAVE YOU TESTIFIED PREVIOUSLY BEFORE THE PUBLIC**  
20 **UTILITIES COMMISSION OF OHIO?**

21 A. Yes. I testified on behalf of the Company in Case No. 12-1685-GA-AIR, *et al.*  
22 (Natural Gas Rate Case).

1   **Q.     DID DUKE ENERGY OHIO CONDUCT REMEDIATION ACTIVITIES IN**  
2       **2013 AT THE TWO FORMER MGP SITES IDENTIFIED IN ITS**  
3       **NATURAL GAS RATE CASE?**

4   A.   Yes, the Company conducted remediation activities in 2013 at the two former  
5       MGP sites identified in the Natural Gas Rate Case and related testimony as the  
6       East End and West End sites. Remediation activities are ongoing at these sites.

7   **Q.     PLEASE DESCRIBE THE CORPORATE STRUCTURE AND**  
8       **MANAGEMENT OVERSIGHT OF THESE TWO SITES.**

9   A.   The remediation projects at these two sites are managed by Environmental  
10       Services as part of the Environmental Health and Safety Department in Regulated  
11       Utilities. Environmental Services is headed by a Vice President who oversees  
12       Directors who are appointed to manage various disciplines/media programs. The  
13       Remediation and Decommissioning Group is specifically located in Air/Waste  
14       Programs within Duke Energy. Each level of management has limited authority  
15       to approve activities and authorize the expenditure of funds. For new purchase  
16       orders, approval also has to be obtained from Duke Energy's sourcing  
17       department.

18               Within the Remediation and Decommissioning Group, I review project  
19       scopes and activities with each individual project manager on a minimum bi-  
20       weekly basis, which I then review with the Director of Air/Waste Programs on a  
21       bi-weekly basis. Information on the status and activities on the East End and  
22       West End sites is reviewed with the Vice President of Environmental Services, at  
23       least monthly and with the financial department, at least quarterly. Known and

1 anticipated activities, including cost estimates, are reviewed with levels of senior  
2 management at least semi-annually and whenever significant decisions are  
3 required on strategy or anticipated costs. Over the course of the year, I meet with  
4 a number of members of Duke Energy management to discuss the status of the  
5 projects, seek input on certain decisions, and obtain approval of spending  
6 requests, as necessary.

7 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THESE**  
8 **PROCEEDINGS?**

9 A. I am the project manager for the MGP investigation and remediation projects at  
10 East End and West End in Duke Energy Ohio's service territory. My testimony  
11 will describe the environmental remediation activities that occurred at the East  
12 End and West End locations in Cincinnati, Ohio, in the calendar year 2013. In so  
13 doing, my testimony will support the recovery of such expenditures that are  
14 requested in Duke Energy Ohio's update to Rider MGP, as authorized by the  
15 Public Utilities Commission of Ohio (Commission).

## **II. BACKGROUND AND HISTORY OF MGP SITES**

16 **Q. THE RECORD IN THE NATURAL GAS RATE CASE DETAILS THE**  
17 **HISTORY OF MANUFACTURED GAS, AS WELL AS THE TYPICAL**  
18 **INVESTIGATION AND REMEDIATION OF FORMER MGP SITES. IS**  
19 **THERE ADDITIONAL INFORMATION TO SUPPLEMENT THAT**  
20 **PRIOR DETAIL?**

21 A. No. Information on the background of manufactured gas and its history in  
22 southwest Ohio is described at length in the Commission's Opinion and Order in

1 the Natural Gas Rate Case (Commission Order). Likewise, the Commission's  
2 Opinion and Order provides details of typical investigation and remediation  
3 activities and a description of the impact of Ohio law and the Ohio Environmental  
4 Protection Agency (Ohio EPA) clean-up programs on the management of the  
5 environmental conditions at Duke Energy Ohio's MGP sites, especially Ohio  
6 EPA's Voluntary Action Program (VAP). This historical information remains  
7 accurate today and, as such, I will instead focus my testimony on activities  
8 occurring during the period relevant to this proceeding – calendar year 2013.

9 All of the environmental work at the East End and West End sites  
10 continues to be performed by environmental consulting firms experienced in  
11 MGP site remediation and under the oversight of Ohio EPA VAP Certified  
12 Professionals (CPs), whose role is to ensure activities are compliant with Ohio  
13 EPA's VAP regulations. The Ohio EPA VAP CPs and environmental consultants  
14 hired to perform activities at the two sites continue to work with me to ensure that  
15 the work complies with the VAP and meets all applicable local, state, and federal  
16 standards, as well as to ensure that the environmental conditions at the sites are  
17 protective of human health and the environment.

### **III. REMEDIATION AT EAST END AND WEST END MGP SITES**

18 **Q. PLEASE DESCRIBE UTILITY ACTIVITIES AT THE EAST END AND**  
19 **WEST END MGP SITES SINCE THE 2012 DIRECT AND**  
20 **SUPPLEMENTAL TESTIMONY AND 2013 ORAL TESTIMONY**  
21 **PROVIDED IN THE NATURAL GAS RATE CASE.**

22 **A.** Both the East End and West End facilities continue to be used as plant in service



1 for utility service by Duke Energy Ohio.

2 At West End, portions of the property that were remediated in 2013 and in  
3 prior years have been turned over to Duke Energy's Transmission and  
4 Distribution Group to begin construction of new electrical equipment that will  
5 replace equipment impacted by the proposed new Brent Spence Bridge (BSB)  
6 corridor project.

7 **Q. PLEASE IDENTIFY THE ACTIVITIES CONDUCTED IN 2013 THAT**  
8 **RELATE TO THE REMEDIATION OF ENVIRONMENTAL**  
9 **CONDITIONS RESULTING FROM THE FORMER EAST END MGP.**

10 A. All work at East End is being conducted under the oversight of an Ohio EPA  
11 VAP CP, employed by the firm of Haley & Aldrich. As noted in the  
12 Commission's Order, the East End site was initially divided into three smaller  
13 identified areas for environmental investigation and remediation purposes that are  
14 referred to, for purposes of the VAP, as the "East Parcel," "Middle Parcel," and  
15 "West Parcel." In 2013, Duke Energy Ohio performed the next iteration of soil  
16 and groundwater sampling on the Middle Parcel and the area west of the West  
17 Parcel. The soil sampling effort included a number of test trenches to investigate  
18 the location of subsurface utilities and historic structures and to provide an  
19 analysis of subsurface conditions that will facilitate remedial planning.  
20 Groundwater wells were installed and sampled on the Middle Parcel, reinstalled  
21 in areas of the West Parcel where remedial activities previously occurred, and  
22 installed in the areas west of the West Parcel to investigate possible impacts from  
23 the former MGP operations. All new wells and existing groundwater wells were

1 sampled in 2013.

2 Duke Energy Ohio's sampling results have identified MGP residuals on a  
3 portion of the area west of the West Parcel, which will require further  
4 investigation and will likely require remediation through the VAP.

5 The soil and groundwater sample results are currently being compiled into  
6 Ohio EPA VAP Phase II reports and are being utilized by Duke Energy Ohio, the  
7 consultants, and the Ohio EPA VAP CP as part of the process of identifying  
8 appropriate remedial technologies to be implemented on the Middle Parcel and  
9 the portion of the west of the West Parcel where MGP contaminants are present in  
10 concentrations that do not meet applicable standards. As is consistent with Duke  
11 Energy Ohio's past practice, the following remedial actions (or combinations  
12 thereof) will be analyzed: institutional controls (*i.e.*, soil management plan, use  
13 restrictions), engineering controls (*i.e.*, caps, fencing, barrier walls, interceptor  
14 trenches), removal actions (*i.e.*, excavation, product recovery), and treatment  
15 technologies (*i.e.*, in-situ solidification, chemical treatment). Other potential  
16 remedial actions may be added for analysis and some actions may be removed  
17 due to site-specific constraints. The results of this evaluation will be documented  
18 as part of the decision-making on the remedial strategies that will performed on  
19 the Middle Parcel and the west of the West Parcel impacted by MGP constituents.

20 The reports that detailed excavation and solidification activities, as  
21 described in the Commission's Order, that occurred on the East and West Parcels  
22 were also finalized in 2013.

23 **Q. PLEASE IDENTIFY THE ACTIVITIES CONDUCTED IN 2013 THAT**

1       **RELATE TO THE REMEDIATION OF ENVIRONMENTAL**  
2       **CONDITIONS RESULTING FROM THE FORMER WEST END MGP**  
3       **SITE.**

4       A.   The work performed in 2013 was, for the most part, a continuation and  
5       completion of the work that commenced prior to 2012 and was described in detail  
6       in the Commission's Order. The work conducted at West End is being performed  
7       under the oversight of an Ohio EPA VAP CP employed by Burns & McDonnell.

8               In 2013, the excavation and solidification activities north of Mehring Way,  
9       especially within the "Phase 2A" area, were completed and backfilled with clean  
10      material, fencing was reinstalled, and the property was turned over to Duke  
11      Energy's Transmission and Distribution Group to begin construction activities for  
12      the new electrical equipment. A limited amount of soil sampling was also  
13      conducted to the north and the west of the western-most substation south of  
14      Mehring Way, in the areas where construction workers will be installing shallow  
15      trenches for new electrical equipment.

16             Groundwater monitoring restarted at West End in 2013 in existing wells  
17      and in wells that were installed in 2013 in those areas that had undergone  
18      excavation and solidification activities.

19             Due to the proximity of a pier proposed as part of the current BSB design,  
20      Duke Energy Ohio has begun a limited investigation to determine whether MGP  
21      impacts may be present in the areas of the Ohio River that will be disturbed by the  
22      BSB construction project. The limited investigation is being performed under the  
23      oversight of an Ohio EPA VAP CP employed by ARCADIS.

1           The limited sediment sampling was performed consistent with permits  
2           and/or approvals obtained from the U.S. Army Corps of Engineers, the Kentucky  
3           Transportation Cabinet, the Ohio Department of Transportation, the U.S. Fish and  
4           Wildlife Services, the Kentucky Department of Fish and Wildlife Resources, the  
5           Ohio Department of Natural Resources Division of Wildlife, and the U.S. Coast  
6           Guard.

7   **Q.   PLEASE DETAIL THE 2013 COSTS INCURRED AT BOTH THE EAST**  
8           **END AND WEST END SITES FOR WHICH DUKE ENERGY IS**  
9           **SEEKING RECOVERY THROUGH RIDER MGP.**

10   A.   In 2013, Duke Energy Ohio incurred approximately \$8.35 million in MGP costs  
11           at East End and West End. The recovery mechanism for the costs incurred in  
12           2013 is discussed in the Direct Testimony of Duke Energy Ohio witness Peggy A.  
13           Laub. The categories of costs that are described at length in the Commission's  
14           Order are applicable to the remediation activities that occurred in 2013. External  
15           costs include: environmental consultants used for the investigation of the soil,  
16           sediment, and groundwater impacts; environmental consultants used to perform  
17           perimeter air monitoring during remedial actions; site security while remedial  
18           actions were ongoing to minimize the potential for thefts; analytical laboratories  
19           that analyzed soil, sediment, groundwater, and ambient air samples; an  
20           environmental contractor who was employed to assist in the management and  
21           review of reports on the two sites; the environmental consulting firm that  
22           provided detailed remedial design, oversight, and construction management, and  
23           who also subcontracted construction firms to carry out the remedial actions; fuel

1 for on-site construction equipment; and landfill disposal costs. Miscellaneous  
2 costs include, but are not limited to: utilities; communications support from an  
3 external firm and the staffing of a community hotline to address concerns raised  
4 by neighbors or other interested parties; utility clearing services; and street  
5 flaggers.

6 Internal costs include: expenses (air travel, rental cars, hotels, etc.) for  
7 Duke Energy employees working on the project; oversight by the Duke Analytical  
8 Laboratory located in Huntersville, North Carolina, that performed audits of the  
9 analytical laboratories and performed quality control and review of analytical  
10 data; oversight and coordination by Duke Energy Power Delivery and Gas  
11 Operations personnel while working in close proximity to sensitive electrical  
12 and/or gas utilities; survey support; and project management oversight.

13 **Q. PLEASE DESCRIBE THE GENERAL PROCESS USED TO ENSURE THE**  
14 **REASONABLENESS OF COSTS INCURRED TO REMEDIATE THE**  
15 **EAST END AND WEST END SITES.**

16 A. As detailed in the Commission's Opinion and Order, Duke Energy Ohio employs  
17 a number of procedures to ensure that the scope of investigation and cleanup work  
18 is appropriate and that the cost to perform that work is reasonable. Duke Energy  
19 project managers work closely with Ohio EPA VAP CPs and experienced  
20 environmental consultants to evaluate different options based on various criteria,  
21 including: compliance with environmental regulations, protection of human health  
22 and the environment, best practices, feasibility, constructability, safety, prior  
23 experience, and cost. These considerations are built into the solicitation of bids

1 and estimates through Duke Energy's "Request for Proposal" process. Bids are  
2 screened first on their technical merit, and then evaluated for cost. Scope  
3 modifications in the field due to new or changing field conditions must be  
4 approved by Duke Energy project managers, and may also require approval from  
5 Duke Energy management and/or Duke Energy's finance department depending  
6 on the extent of the modification and other circumstances.

7 **Q. BASED ON YOUR EXPERIENCE, DID DUKE ENERGY OHIO**  
8 **REASONABLY AND PRUDENTLY INCUR APPROXIMATELY \$8.35**  
9 **MILLION IN COSTS IN 2013?**

10 A. Yes. The activities that occurred at the East End and West End properties related  
11 to the remediation of MGP impacts were conducted following the procedures  
12 described in my 2012 written testimony and 2013 oral testimony in the Natural  
13 Gas Rate Case, activities that were deemed to be prudent by the Commission in  
14 its Order. Based on my experience with remediating MGP sites like East End and  
15 West End, the approximate \$8.35 million represents reasonable and prudent costs  
16 for the work that was performed in 2013.

17 **Q. PLEASE DISCUSS THE TIMING AND PLANNING RELATED TO THE**  
18 **WORK THAT WAS PERFORMED IN 2013 AND FUTURE ACTIONS**  
19 **PLANNED TO BE PERFORMED AT EAST END AND WEST END.**

20 A. These type of environmental projects are iterative in nature. That is, each step of  
21 the process must be taken in the proper order, and it is not prudent to move to the  
22 next step until the necessary information is gathered and decisions are made  
23 concerning the results and next steps. It is necessary to move deliberately in order

1 to avoid needless expense and also to avoid having to repeat processes  
2 unnecessarily. Typically, therefore, once the areas where the former MGP  
3 processes were located have been evaluated and remediated, potential off-site  
4 impacts will then be evaluated to determine whether off-site investigation and/or  
5 additional remediation will be required. Based upon my experience with MGP  
6 site remediation projects and the conditions at the sites, it is expected that some  
7 amount of off-site investigations will be required to address the sites. Again, this  
8 demonstrates the iterative nature of these projects.

9 In Ohio, each site is unique and the remedial actions must be sequenced in  
10 such a way that remediation can move in a judicious manner without adversely  
11 impacting other activities at the site, especially those that ensure the delivery of  
12 gas and electricity to Duke Energy Ohio's customers. The actions conducted and  
13 planned at the East End and West End facilities are being sequenced to minimize  
14 disruptions to operations and to facilitate known future construction activities at  
15 each site. As I previously testified in 2012 and 2013, the uplands portion of  
16 environmentally impacted sites are typically addressed first as the remediation of  
17 the "source" material, or the impacts in the soil, are expected to result in the  
18 improvement of groundwater quality and of any down-gradient plumes. Once the  
19 impacted soils are addressed, the groundwater is the next area of focus, and then  
20 off-site impacts. This is the general sequence that Duke Energy Ohio is  
21 implementing on both Ohio MGP sites, initially focusing on the soil and  
22 groundwater, and then looking offsite.

23 By performing the remedial actions in a sequenced manner, Duke Energy

1 Ohio is not only addressing environmental impacts, but is also performing the  
2 actions in a sequence that would allow gas and electrical service to be  
3 uninterrupted and which takes into account future construction activities.

4 At East End, the initial remedial activities were conducted in areas where  
5 the Duke Energy Ohio Gas Department was planning to install new vaporizers  
6 (West Parcel) and where a new gas line was anticipated (East Parcel); the  
7 activities were also conducted on those two parcels since they were closest to the  
8 anticipated residential developments, a change in site use. In 2013, Duke focused  
9 on addressing other accessible areas of East End.

10 At West End, the actions completed in 2013 were in the areas Duke  
11 Energy Ohio employees are currently constructing new electrical equipment to  
12 replace equipment that will be impacted by the construction of the new BSB  
13 corridor project. In 2013, Duke focused on addressing other accessible areas of  
14 West End and, in a slight deviation from the normal sequence of activities,  
15 performed a limited off-site sediment investigation.

16 **Q. PLEASE DESCRIBE ANY FACTORS OUTSIDE OF DUKE ENERGY**  
17 **OHIO'S CONTROL THAT MAY AFFECT THE TIMING OF THE WORK**  
18 **BEING PERFORMED AT EAST END AND WEST END.**

19 A. Duke Energy Ohio is diligently working on the two sites, but may face challenges  
20 due to the sites' size, operational history, current operational constraints, and  
21 factors outside of Duke Energy Ohio's control. For example, there are critical  
22 underground structures at East End that will limit what remedial actions can be  
23 accomplished. At West End, Duke Energy Ohio cannot investigate and remediate



1 under the western-most substation at this time without impacting the ability of  
2 Duke Energy Ohio to provide electricity to downtown Cincinnati. Engineering  
3 and institutional controls can be, and most likely will be implemented and  
4 maintained in the short term to manage the known or potential impacts, but the  
5 liability will not be fully addressed until the environmental conditions can be fully  
6 investigated, analyzed, and remediated, as required.

7 The timing and expense of the remediation efforts at both East End and  
8 West End may be influenced by external factors and the actions of third parties  
9 over whom Duke Energy Ohio has very little to no control. Examples of external  
10 factors include, but are not limited to, weather delays, unforeseen permitting  
11 requirements, access restrictions from off-site property owners, changes in  
12 environmental regulations, permitting review timeframes, and completion of work  
13 by others in order to allow for remediation activities to be completed. For  
14 example, permitting agencies imposed additional and unexpected pre-sampling  
15 requirements upon Duke Energy Ohio before they would issue the necessary  
16 permits. These requirements, which had not been identified during the initial  
17 review of required permits performed by the environmental consultants and the  
18 Ohio EPA VAP CP, resulted in a delay of approximately six months.

19 **Q. PLEASE EXPLAIN WHAT DUKE ENERGY OHIO IS DOING TO**  
20 **PURSUE OTHER MEANS OF FUNDING THE REMEDIATION AT EAST**  
21 **END AND WEST END.**

22 **A.** Duke Energy Ohio witness Keith Bone will explain activities related to the  
23 Company's efforts to seek insurance coverage for the costs incurred in

1 remediating the two MGP sites, consistent with the Commission's Order.

2 Additionally, Duke Energy Ohio continues to investigate and pursue other  
3 potentially responsible parties that may be liable to contribute to the costs of  
4 investigating and remediating the East End and West End sites. Duke Energy  
5 Ohio provided NiSource, Inc., the successor to Columbia Gas & Electric, a letter  
6 setting forth Duke Energy Ohio's belief that Columbia Gas/NiSource has legal  
7 responsibility for some of the costs of the investigation and cleanup at East End  
8 and West End. In early March 2014, representatives of Duke Energy Ohio and  
9 NiSource met to discuss this issue further. Duke Energy Ohio anticipates that the  
10 parties will have further discussions on this issue.

#### IV. CONCLUSION

11 **Q. DOES THIS CONCLUDE YOUR DIRECT PRE-FILED TESTIMONY?**

12 **A. Yes.**

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**3/31/2014 4:09:00 PM**

**in**

**Case No(s). 14-0375-GA-RDR, 14-0376-GA-ATA**

Summary: Testimony DIRECT TESTIMONY OF JESSICA L. BEDNARCIK ON BEHALF OF  
DUKE ENERGY OHIO, INC.  
electronically filed by Carys Cochern on behalf of Watts, Elizabeth H. Ms.