

From: [Bell, Terry](#)
To: [Puco Docketing](#)
Subject: Duke pipeline
Date: Monday, September 26, 2016 1:13:11 PM
Attachments: [image009.png](#)
[image010.png](#)
[image011.png](#)
[image012.png](#)

From: webmaster@puc.state.oh.us
To: PUCO ContactThePUCO
Subject: PUCO CONTACT FORM: 109174
Received: 9/26/2016 12:49:59 PM
Message:
WEB ID: 109174 AT:09-26-2016 at 12:49 PM
Related Case Number: 16-0253
TYPE: Complaint
NAME: Mrs. Evelyn Wagner
CONTACT SENDER ? Yes
MAILING ADDRESS:

- 9574 Heather Ct
- Blue Ash , Ohio 45242
- United States

PHONE INFORMATION:

- Home: *(no home phone provided?)*
- Alternative: *(no alternative phone provided?)*
- Fax: *(no fax number provided?)*

E-MAIL: evelynabeles@gmail.com

INDUSTRY:Gas

ACCOUNT INFORMATION:

- *(no utility company name provided?)*
- *(no account name provided?)*
- *(no service address provided?)*
- *(no service phone number provided?)*
- *(no account number provided?)*

COMPLAINT DESCRIPTION:

I am writing to ask the Board to deny Duke Energy's request that the OPSB waive the requirements to hold another public meeting on the routes proposed in their filing on Sept 13, 2016 and to send letters of information to all affected homeowners along the routes. The public is due full transparency and full information. The request for a waiver is not in the best interest of the public. There is no cost to denying the waiver other than an expense to Duke. In contrast, the cost to the public of granting the waiver would be great. Duke owes the public a fully transparent process in light of their route changes, design changes and all project details finally laid out in their application. The public ought to be able to fully engage with Duke on their proposal as it impacts the environment, route construction and safety implications. Further, the public deserves the opportunity to ask for more information regarding Duke's plans for upgrades of the A-Line and details on the 4 future projects that Duke is planning that

relate to this proposal. Duke must be held fully accountable and provide the fullest transparency. Please say no to this waiver. The cost is too great to our communities. Sincerely,
Evelyn Wagner

Terry S. Bell

Public Utilities Commission of Ohio

Service Monitoring and Enforcement Department

Chief Customer Education and Contact Division

(614) 995-9087

www.PUCO.ohio.gov



From: [Bell, Terry](#)
To: [Puco Docketing](#)
Subject: Duke pipeline
Date: Tuesday, September 27, 2016 7:03:23 AM
Attachments: [image009.png](#)
[image010.png](#)
[image011.png](#)
[image012.png](#)

From: webmaster@puc.state.oh.us
To: PUCO ContactThePUCO
Subject: PUCO CONTACT FORM: 109188
Received: 9/26/2016 11:38:58 PM
Message:
WEB ID: 109188 AT:09-26-2016 at 11:38 PM
Related Case Number: 16-0253
TYPE: Complaint
NAME: Ms. Scarlet McKeever
CONTACT SENDER ? No
MAILING ADDRESS:

- 5300 Stewart Ave
- Cincinnati , Ohio 45227
- USA

PHONE INFORMATION:

- Home: 6144252114
- Alternative: *(no alternative phone provided?)*
- Fax: *(no fax number provided?)*

E-MAIL: feversm@gmail.com

INDUSTRY:Gas

ACCOUNT INFORMATION:

- Company: Duke Energy
- *(no account name provided?)*
- *(no service address provided?)*
- *(no service phone number provided?)*
- *(no account number provided?)*

COMPLAINT DESCRIPTION:

With regards to the pipeline planned for Cincinnati, I think it is very important for the public to be involved with discussion and decisions despite the company seeking to forgo the transparency of this type of forum. All inhabitants and visitors to Cincinnati have the potential to be affected by the plan and as such need the ability to both listen to relevant discussion and to voice opinion and dissent as warranted. Thank you.

Terry S. Bell

Public Utilities Commission of Ohio

Service Monitoring and Enforcement Department

Chief Customer Education and Contact Division

(614) 995-9087

www.PUCO.ohio.gov



From: [Johnson, Thomas](#)
To: [Puco Docketing](#)
Subject: FW: Oppose the Central Corridor Pipeline Extension Project
Date: Monday, September 26, 2016 8:48:05 AM

16-253- GA-BTX

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

From: Ronna Lucas [<mailto:info@nopecincy.org>]
Sent: Sunday, September 25, 2016 3:22 PM
To: Johnson, Thomas <Thomas.Johnson@puco.ohio.gov>
Subject: Oppose the Central Corridor Pipeline Extension Project

Dear PUCO Commissioner Thomas W. Johnson,

As a resident of Blue Ash and concerned citizen, I am writing you to register my opposition to Central Corridor Pipeline Extension Project (Reference No. 16-253- GA-BTX).

RE: Case No. 16-253-GA-BTX

Dear Government Representatives:

By now you are aware that Duke Energy (?Duke?) is proposing to install a 12 mile long 20" natural gas transmission pipeline through large portions of densely populated communities in central Hamilton County. The project, called the "Central Corridor Pipeline" is capable of transporting up to 500 PSI of compressed natural gas daily. See Duke's Application wherein it stated that this line has a MAOP of 500PSI and it plans to operate up to that pressure. This design is allegedly an improved version of Duke's original proposal of a 12 mile long 30" 720 PSI transmission pipeline. However, the new proposed design, just as the old proposal, is objectionable and presents unnecessary risks for the communities involved.

Not only is the need for a transmission line of this magnitude questioned, Duke's public handling of this matter is problematic and insulting to the people who reside in the affected areas.

Duke has indicated that it has "heard" the public outcry to the original design and as a result modified its project by 1/3 to show that it has listened to the public. But has it really listened? Or is it merely modifying a project in a way that allows it to obtain the exact same dubious goal? That issue will be further examined below.

First, it is my understanding that the OPSB does not consider safety factors in its evaluation of an application and does not consider safety to be an issue, but that instead the issue of "need" is a primary concern. This is truly unfortunate. But that being the case, I will instead raise "need" questions. Communities and residents of Hamilton County need to be safe in their homes, schools, hospital, places of worship, etc. These large transmission lines present inherent risks - risks of third party incidents in striking the lines, risks of welds failing, risks of leaks, etc. These risks could be mitigated by removing the line from high sensitive facilities.

Sadly, Ohio, unlike many other states, does not have any setback regulations which dictate how far a transmission line may come from a home, school, church, etc., and according to Duke this line may "be only a few inches from [ones] foundation." However, while there are no formal setback regulations, Duke continues to ignore safety recommendations from industry journals which conclude that high pressure pipelines are "better utilized for safe zones and areas not residential." "Journal of Loss Prevention" Nov. 2008 vol 2(6) 589-595. But if the industry recommendations are not enough for this acting board to reject Duke's application, let us look further at the issue of need. Transmission pipelines of this magnitude generally stop outside the city-gates and the natural gas is then distributed throughout city corridors by means of smaller, less dangerous, less pressurized lines. By doing so the potential for harm is significantly diminished. The current plan to deviate from this typically safe manner of distribution of natural gas seems unnecessary and ill-advised.

The original pipeline allowed Duke to transport enough natural gas through a populated area to supply gas to over 2.1 million homes daily. By cutting the scope of this line by 1/3 Duke is still able to transport through highly populated areas enough natural gas to supply gas to over 1.4 million homes daily. While this may on its face seem like a compromise, Duke has also indicated in its application that it would also be seeking to upgrade/increase the pressure to its existing A-line. Thus, Duke alleged modifications are really just the same project that the communities objected to from the start.

One must closely evaluate whether Duke actually needs to provide enough natural gas daily to over 1.4 to 2.1 million homes daily through only 2 of its many natural gas lines that run through Hamilton County. Why should we only look at Hamilton County's needs when Duke provides natural gas throughout Ohio and Kentucky? This is because Duke itself has repeatedly stated throughout this process that the subject pipeline is "only serve parts of the Duke Energy Greater Cincinnati gas distribution system, supplying natural gas solely to local users." Cincinnati Enquirer Article by Carrie Blackmore Smith ? June 30, 2016.

According to Duke, it "provides natural gas services to approximately 420,000 customers" in ALL of Ohio; not just to the Hamilton County area. See Application at p.2-8. Previously at one of the public forums on either June 15, 2016 or July 27, 2016 Duke's representatives indicated that Hamilton County represents about 2/3 of Duke's overall customers. That means that there are approximately 277,200 customers in Hamilton County. According to Duke residential customers are 91% making up 50% of the overall use, with the other 9% of customers are commercial/industrial using the other 50% of its gas (8% commercial use about 29% gas and less than 1% industrial use 10% gas). See Application at p.3-1. This means that of the approximately 277,200 customers in Hamilton County, about 252,252 are residential and about 24,948 are commercial/industrial. If 252,252 residential customers use 50% of the natural gas and the other 50% is for the 9% commercial/industrial customers then Duke only needs to supply enough natural gas to our local area for approximately 500,000 residential size facilities. Again, this leaves a gaping hole in Duke's application as to why they suddenly need to add to its existing system enough gas for 1.4 to 2.1 million more residential size facilities. Remember, Duke is already supplying gas to our area and the gas is already sufficient to meet current needs, so why increase the gas supply by over three-fold for this one single line?

Where is all that extra natural gas going? According to several statements made by Chuck Whitlock, Duke's V.P., on June 15, 2016, the natural gas that is being pushed through our densely populated areas will also be going to Duke's Kentucky customers. In fact, per Mr. Whitlock, Duke considers Kentucky and Ohio to be the same "integrated system." But the densely populated communities of Hamilton County are being asked to solely bear the risks "safety, economic, etc." of the entire project so that Duke can provide natural gas to its interstate customers in Kentucky and beyond. See Application p.3-1.

Duke stated that it did a twenty year evaluation of its needs and in its application it concluded without evidence that a smaller line will not meet all of the additional needs for its customers. But whose needs is Duke referring to?

Evidence has shown, and Duke has admitted on July 27, 2016, that the local gas needs remain relatively flat. See Application at p.3-5. In fact, the Ohio State Demographer Research Office data show that the population of Hamilton County is going down in the next 20 years. A July 22, 2015 report by the Staff of the Public Utilities Commission of Ohio "Ohio Long term Forecast Energy Requirements shows that within the nearly next twenty years residential gas use for all of Ohio is decreasing, as is commercial natural gas use. See Report of July 22, 2015. The only areas of growth are the less than 1% of industrial use. Id. But the best evidence contrary to Duke's current statement that it "needs" this massive volume of additional natural gas for Ohio is Duke's own 2014 Long-Term Forecast Report that was filed with the PUCO under Case No.14-868-GA-FOR that clearly shows its overall projected total sales declining through 2024.

Next, Duke states that the pipeline project is "intended to allow for the retirement of the propane-air facilities." See Application p.2-2. These propane-air facilities allegedly provide an additional 10% of natural gas to our area on peak days (7-10 days during the year). Id. According to the calculations above that means that on about 7-10 days during the year Duke needs to supply enough natural gas to our local area for approximately 50,000 residential size facilities. With a maximum of 550,000 residential size facilities being supplied gas on peak days Duke still provides no explanation why they suddenly need to add enough gas for 1.4 to 2.1 million residential size facilities to its already existing and running system. Again, Duke is already supplying gas to our area and the gas is already sufficient to meet current needs, so why increase the local gas supply by over three-fold for this one single line? Moreover, Duke provides no explanation why the stations cannot be up-dated or why a smaller less pressurized line

would not suffice.

If we look at just how many large sized, high pressured lines are actually in Ohio's urbanized areas, there are only two examples that can be found. One in Lorain County which is a 24" pipeline which carries about 100 PSI of natural gas and the other was in Lucas County which is also a 24" line and, by my calculations, only carries 40 PSI of compressed natural gas; neither coming close to matching the size nor operating pressure of this proposed pipeline. In fact, to my knowledge the only large size, high pressure pipeline that Duke operates near Hamilton County is its C314 line that is 24", runs at over 500 PSI. This line was installed in a non-urbanized or much less densely populated area and runs through less densely populated areas. Furthermore, then this line was approved by the OPSB the board itself questioned the need for a line so large; a line that over 13 years later Duke still only runs at less than 25% during a peak day. See Duke's Answers to Questions Commonly Asked on its webpage.

All of the above clearly demonstrates that Duke's allegations of "need" for a project of this magnitude remains to be seen and the facts may actual show to the contrary. Furthermore, Duke's request to waive any further public hearings deprives the public the right to continue demanding explanations for unanswered conclusory statements. The application as submitted by Duke includes changes from its original routes, includes changes to design, changes to potential blast zones, and new references to "balancing" the system by up-grading the existing A-line; such that the public deserves the right to continue seeking explanations and answers to understand what is being sought of them. Thus, I would ask that you deny Duke's request to waive any further hearings AND reject the application that has been submitted.

Sincerely,

Ronna S. Lucas

This pipeline will travel through densely populated areas, including my neighborhood and will pose a danger to residences, schools, businesses and houses of worship.

Unlike delivery pipelines, this pipeline will be under up to 720psi pressure and an accident or rupture could cause injuries, death and destruction of property within a radius of 1/3 mile.

I ask you to oppose this pipeline and encourage both Duke Energy and the Ohio Power Siting Board to reject this pipeline

Thank you for your consideration.

Regards,
Ronna Lucas

From: [Johnson, Thomas](#)
To: [Puco Docketing](#)
Subject: FW: Motion for Waiver by Duke Energy Ohio
Date: Friday, September 23, 2016 3:41:06 PM

16-0253-GA-BTX

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

From: Ethan Boger [<mailto:eb4452@gmail.com>]
Sent: Thursday, September 22, 2016 2:11 PM
To: Johnson, Thomas <Thomas.Johnson@puco.ohio.gov>
Subject: Fwd: Motion for Waiver by Duke Energy Ohio

From: Ethan Boger <eb4452@gmail.com>
To: Johnson, Thomas <Thomas.Johnson@puco.ohio.gov>
Elizabeth Rueve-Miller [<mailto:info@nopecincy.org>]

Subject: Motion for Waiver by Duke Energy Ohio filed 13 Sept., 2016 in Docket 16-0253-GA-BTX

Dear PUCO Commissioner Thomas W. Johnson,

I am writing to oppose the subject request for waiver and to clarify statements in recent comments inserted into the record regarding the pipeline pressure. My opposition to the waiver is related to this issue.

In various comments reference was made to pipeline pressures that are above the MAOP of 500 psi stated in the Duke application. In the application (p. 5-8) Duke states:

“The proposed pipeline will have a MAOP of 500 PSIG and is planned to operate up to this pressure”.

However, Duke does not mention here or elsewhere in the application that the MAOP could be increased in future, as allowed by 49CFR § 192.555. This section is copied below for ease of reference.

Further on p. 5-8, Duke writes:

“The proposed pipeline will be constructed of pipe having an outside diameter of 20 inches, a wall thick-ness equal to or greater than 0.375 inches, and pipe lengths of approximately 40 feet. The pipe will be manufactured in accordance with API Specification 5L, Grade X-60 (specified minimum yield strength of 60,000 PSI). The pipe lengths will be joined by the electric resistance welding process”.

Earlier in its application Duke stated that the entire pipe route will be considered a Class 4. Per code, this limits the MAOP such that the nominal pipe wall hoop stress is no more than 40% of yield strength, or, 24,000 psi for the specified material. It is common knowledge that hoop stress is computed from the formula $s = pR/t$, where s is the hoop stress, p is the fluid static pressure, t is wall thickness and R is the nominal pipe radius. Inserting the values stated in the application (500 psi, $20/2=10$ inch, 0.375 inch repectively),

$$s = 500 \times 10 / 0.375 = 13,333 \text{ psi.}$$

This is far below the 24,000 psi Class 4 limit. In fact, the theoretical upper pressure limit is 900 psi. For this reason, and because it is allowed by code, I feel that this aspect of the design and operation, i.e., that future plans may include increasing the MAOP, should have been addressed in the application with a statement saying affirmatively that Duke will never, ever increase the MAOP above 500 psi or, by acknowledging that it does have the right to do so and may exercise that right in future.

Now, to clarify statements in recent comments alluding to pressures beyond 500 psi (specifically, 720 psi has been mentioned); these hark back to Duke's original proposal for a 30-inch dia, 720 psi pipe. Since 720 psi was initially proposed, it is reasonable to assume that Duke would have the capability to increase system operating pressure to that level, were it to invoke 49CFR § 192.555.

There are other aspects of the application that warrant further public comment, including notification to residents and businesses along the route. For example, the description of orange route in the text of the application (p. 2-6) and as shown in Appendix 4-1 does not match other maps (Figure 2-2 and Figure 5-1A). This is confusing at best. Clarifications should be made and sent out to affected parties.

Thank you for your consideration and please post this letter in the comment section of the docket.

Respectfully,
Ethan Boger
9779 Troon Ct,
Blue Ash, OH 45241

§ 192.555 Upgrading to a pressure that will produce a hoop stress of 30 percent or more of SMYS in steel pipelines.

(a) Unless the requirements of this section have been met, no person may subject any segment of a steel pipeline to an operating pressure that will produce a hoop stress of 30 percent or more of SMYS and that is above the established maximum allowable operating pressure.

(b) Before increasing operating pressure above the previously established maximum allowable operating pressure the operator shall:

(1) Review the design, operating, and maintenance history and previous testing of the segment of pipe-line and determine whether the proposed increase is safe and consistent with the requirements of this part; and

(2) Make any repairs, replacements, or alterations in the segment of pipeline that are necessary for safe operation at the increased pressure.

(c) After complying with paragraph (b) of this section, an operator may increase the maximum allowable operating pressure of a segment of pipeline constructed before September 12, 1970, to the highest pressure that is permitted under § 192.619, using as test pressure the highest pressure to which the segment of pipeline was previously subjected (either in a strength test or in actual operation).

(d) After complying with paragraph (b) of this section, an operator that does not qualify under paragraph (c) of this section may increase the previously established maximum allowable operating pressure if at least one of the following requirements is met:

(1) The segment of pipeline is successfully tested in accordance with the requirements of this part for a new line of the same material in the same location.

(2) An increased maximum allowable operating pressure may be established for a segment of pipeline in a Class 1 location if the line has not previously been tested, and if:

(i) It is impractical to test it in accordance with the requirements of this part;

(ii) The new maximum operating pressure does not exceed 80 percent of that allowed for a new line of the same design in the same location; and

(iii) The operator determines that the new maximum allowable operating pressure is consistent with the condition of the segment of pipeline and the design requirements of this part.

(e) Where a segment of pipeline is upgraded in accordance with paragraph (c) or (d)(2) of this section, the increase in

pressure must be made in increments that are equal to:

(1) 10 percent of the pressure before the uprating; or

(2) 25 percent of the total pressure increase,

Whichever produces the fewer number of increments.

From: [Johnson, Thomas](#)
To: [Puco Docketing](#)
Subject: FW: Oppose the Central Corridor Pipeline Extension Project
Date: Friday, September 23, 2016 3:41:18 PM

16-253- GA-BTX

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

From: Mary A. Kindel [<mailto:info@nopecincy.org>]
Sent: Thursday, September 22, 2016 2:05 PM
To: Johnson, Thomas <Thomas.Johnson@puco.ohio.gov>
Subject: Oppose the Central Corridor Pipeline Extension Project

Dear PUCO Commissioner Thomas W. Johnson,

As a resident of Silverton and concerned citizen, I am writing you to register my opposition to Central Corridor Pipeline Extension Project (Reference No. 16-253- GA-BTX).

I am opposed to the Central Corridor Pipeline Extension Project. Pipelines such as these have been known to explode. This pipeline is proposed to run through a densely populated area. While I am personally not in the "blast zone" I am close enough that if there were to be some sort of emergency, due to being disabled and housebound, I would have difficulty evacuating.

In addition, I have many friends and family members in the area who could also be affected. Even if a final route selected is not near me or anyone I know, I am still opposed. It is not clear why this pipeline is even needed - why can't they simply replace aging pipelines with the same type of pipes. Duke seems to have ulterior motives they're not being transparent about.

In addition, due to climate change, we need to be transitioning away from fossil fuels into a sustainable low carbon economy. I would rather see money spent on that.

This pipeline will travel through densely populated areas, including my neighborhood and will pose a danger to residences, schools, businesses and houses of worship.

Unlike delivery pipelines, this pipeline will be under up to 720psi pressure and an accident or rupture could cause injuries, death and destruction of property within a radius of 1/3 mile.

I ask you to oppose this pipeline and encourage both Duke Energy and the Ohio Power Siting Board to reject this pipeline

Thank you for your consideration.

Regards,
Mary A. Kindel

From: [Johnson, Thomas](#)
To: [Puco Docketing](#)
Subject: FW: Oppose the Central Corridor Pipeline Extension Project
Date: Tuesday, September 27, 2016 8:17:54 AM

16-253- GA-BTX

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

From: Marj & Bill Hoffman [<mailto:info@nopecincy.org>]
Sent: Monday, September 26, 2016 7:57 PM
To: Johnson, Thomas <Thomas.Johnson@puco.ohio.gov>
Subject: Oppose the Central Corridor Pipeline Extension Project

Dear PUCO Commissioner Thomas W. Johnson,

As a resident of Sycamore Twp and concerned citizen, I am writing you to register my opposition to Central Corridor Pipeline Extension Project (Reference No. 16-253- GA-BTX).

It is physically dangerous and highly destructive to our neighborhood.
And I am a Duke shareholder.

This pipeline will travel through densely populated areas, including my neighborhood and will pose a danger to residences, schools, businesses and houses of worship.

Unlike delivery pipelines, this pipeline will be under up to 720psi pressure and an accident or rupture could cause injuries, death and destruction of property within a radius of 1/3 mile.

I ask you to oppose this pipeline and encourage both Duke Energy and the Ohio Power Siting Board to reject this pipeline

Thank you for your consideration.

Regards,
Marj & Bill Hoffman

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

9/28/2016 11:06:40 AM

in

Case No(s). 16-0253-GA-BTX

Summary: Public Comment in opposition filed on behalf of various concerned consumers electronically filed by Ms. Donielle M Hunter on behalf of PUCO Staff