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CONTACT_REASON: Comment
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 COMPANY_NAME:
 CASE_NUMBER: 16-0253-GA-BTX
 COMMENTS: Members of the Ohio Power Siting Board,

RECEIVED-CONTACT OPSB
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 PUCCO

I strongly oppose the preferred route of Duke Energy's Central Corridor Gas Pipeline Extension Project, as presented to the public on January 26, 2017 at the Crown Plaza Hotel in Blue Ash and as laid out in Duke's online maps. My opposition is based on the fact that Duke's project description falls way short of its industry's best practices, as described by the American Gas Association, and that Duke's maps of the Blue Ash area recklessly ignore the presence of three schools along the projected route.

The overriding concern of the audience at Duke's January 26 presentation was safety. The Duke speaker addressed these concerns by stating that gas will be delivered through distribution rather than transmission pipelines and that only 4% of the preferred route runs through residential areas. The speaker did not allow for any questions.

Unable to receive satisfactory answers from other Duke personnel after the presentation, I started my own research on the question of safety of gas pipelines. The American Gas Association (AGA) -- of which, I assume, Duke Energy is a prominent member -- publishes fact-sheets that address the following specific points, pertinent to routing a pipeline through an area like Blue Ash, where I live:

1. "Safety is and always will be the natural gas industry's first priority." ... ". Natural gas utilities are subject not only to their own stringent internal controls, but must also meet rigorous federal and state oversight. Inspections are performed regularly by state regulators to help ensure that compliance is being met."

Putting safety as the first priority is what the audience at the Duke presentation wanted to hear, but was not told.

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2. The AGA fact-sheet defines a "High Consequence Area" (HCA) as an area "where people live and work or are known to congregate on a regular basis." Transmission lines routed through HCAs require more frequent and more intensive inspections than non-HCA transmission lines which, in turn, call for more frequent and intensive inspections than distribution lines.

Much of Blue Ash -- with a residential population of around 12,000, a daytime population of 53,000, and a vibrant downtown with many stores, restaurants, and office buildings -- should be classified as an HCA. Duke's statement that only 4% of the pipeline is routed through residential area is therefore vastly misleading with respect to the goal of safety as a first priority: by definition, the detrimental consequences are higher in HCAs than in residential areas and the percentage HCAs along the route through Blue Ash is vastly greater than 4%.

An HCA's general description as an area where "people congregate on a regular basis" also captures the presence of schools along a pipeline, an issue Duke conveniently ignored completely. On the Duke online-map of the Blue Ash area, there are at least 3 schools along the preferred pipeline route: Ursuline Academy (high school), Blue Ash Educational Building (daycare through kindergarten) and Edwin H. Green Intermediate School. On the Duke map, the legends box indicates that school buildings are marked in 'yellow'; but, in fact, none of the three schools are. Should not school safety be a higher priority than safety for businesses or private homes? Maybe physical inspection of the preferred route on the ground, rather than from a satellite map, would ensure that safety assessments accurately account for HCAs in general and for HCA's with schools in particular.

3. Concerning the distinction between transmission and distribution lines, the AGA states that "In general, a transmission pipeline is a larger diameter line operating at a higher operating pressure and transports the natural gas between states, counties, cities and towns. Distribution pipelines are generally the smaller diameter lines at lower operating pressures that deliver natural gas directly to local homes and businesses."

In the Duke presentation, the pipeline along the preferred route was described as a distribution pipeline. Clearly, the Duke classification is not consistent with the AGA definition. Furthermore, Blue Ash was not recognized as an HCA. Consequently, Duke tried to tell the audience that the pipeline through Blue Ash is a lowest-risk pipeline which will receive the most-infrequent and least-intensive inspections once it is operating. I find this deceptive approach to informing the public highly objectionable and I hope that your deliberations will take account of it.

Duke's actions have to be carefully monitored. Payments I and thousands of other Duke customers recently received, as the result of a class-action suit against Duke, represent a stark reminder that Duke does not always act in the best interest of the communities it serves.

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For more information on pipeline safety, go to:
<https://www.aga.org/fact-sheets/pipeline-safety>
Go to bottom of page and click on: Fact sheet: Pipeline Safety