

**BEFORE THE  
OHIO POWER SITING BOARD**

In the Matter of the Application of Duke	)	
Energy Ohio, Inc. for a Certificate of	)	
Environmental Compatibility and Public Need	)	Case No. 16-253-GA-BTX
for the C314V Central Corridor Pipeline	)	
Extension Project.	)	

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**PETITION FOR LEAVE TO INTERVENE OF  
THE JEWISH HOSPITAL – MERCY HEALTH**

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Pursuant to Ohio Administrative Code (“OAC”) Rule 4906-2-12(A)(2), The Jewish Hospital – Mercy Health (“The Jewish Hospital”) respectfully petitions the Ohio Power Siting Board (“Board” or “OPSB”) for leave to intervene in the above-captioned proceeding. As set forth in the attached Memorandum in Support, The Jewish Hospital has a real and substantial interest in this proceeding. Its interests are not adequately represented by any other party to this matter, and its participation will contribute to a just and expeditious resolution of the issues presented. Further, The Jewish Hospital’s participation will not unduly delay this proceeding or cause undue prejudice to any party.

For these reasons, as more fully set forth in the Memorandum in Support, The Jewish Hospital respectfully requests that the Board grant its Petition for Leave to Intervene.

Respectfully submitted on behalf of  
THE JEWISH HOSPITAL – MERCY HEALTH



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**BEFORE THE  
OHIO POWER SITING BOARD**

In the Matter of the Application of Duke Energy	)	
Ohio, Inc. for a Certificate of Environmental	)	
Compatibility and Public Need for the C314V	)	Case No. 16-253-GA-BTX
Central Corridor Pipeline Extension Project.	)	
	)	

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**MEMORANDUM IN SUPPORT**

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The Jewish Hospital is a community hospital faithful to its Jewish heritage and grounded in the Jewish and Catholic traditions of service to the community. It provides advanced, compassionate, quality care in the greater Cincinnati area and surrounding communities through its care network. The Jewish Hospital is located in Kenwood, a Cincinnati suburb that provides convenient access from around the Tristate.

On September 13, 2016, Duke Energy Ohio, Inc. (“Duke”) filed an application for authority to construct C314V Central Corridor Pipeline Extension, a 13 mile, 20-inch diameter pipeline with an operating pressure of (the “Project” or “Pipeline”). The Pipeline will pass through densely populated areas in more than 11 separate jurisdictions within Hamilton County. On January 20, 2017, Duke filed an Amended Application which was further supplemented on February 13, 2017, February 24, 2017 and March 3, 2017. As proposed, the Pipeline route will follow the west and south borders of The Jewish Hospital.

OAC Rule 4906-2-12 sets forth the Board’s rule regarding intervention. In deciding whether to permit intervention, OAC Rule 4906-2-12(B)(1) states that the Board or administrative law judge may consider:

- (1) The nature and extent of the person's interest.
- (2) The extent to which the person's interest is represented by existing parties.
- (3) The person's potential contribution to a just and expeditious resolution of the issues involved in the proceeding.
- (4) Whether granting the requested intervention would unduly delay the proceeding or unjustly prejudice an existing party.

The Jewish Hospital meets these criteria for intervention. First, The Jewish Hospital has a significant interest in Duke's pending application. The Jewish Hospital provides critical services to the community that may be impacted by the Pipeline construction. The Pipeline would likely have significant impact on the recently constructed tower and the medical infrastructure related to Jewish Hospital's gamma knife and linear medical accelerator. The Pipeline would limit future expansion of the campus, which would hinder the hospital's ability to meet the growing needs of the community. In addition, access to the campus would be limited during construction if the Pipeline proceeds, thereby hindering the ability of EMS to transport patients to The Jewish Hospital.

For the reasons stated above, no existing party in this proceeding is able to represent The Jewish Hospital's interests. The Jewish Hospital's intervention will not unduly prolong or delay the proceedings. Further, The Jewish Hospital's intervention will significantly contribute to the full development of the record and its resolution by informing the Board and the other parties of the Pipeline's potential impacts to a medical facility serving the local community.

For these reasons, The Jewish Hospital respectfully requests that its Petition for Leave to Intervene be granted.

Respectfully submitted on behalf of  
THE JEWISH HOSPITAL – MERCY HEALTH



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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Petition for Leave to Intervene was served upon the parties of record listed below this 12<sup>th</sup> day of April 2017 via electronic mail.



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Dylan F. Borchers

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Summary: Petition Petition for Leave to Intervene of The Jewish Hospital electronically filed by Mr. Devin D. Parram on behalf of The Jewish Hospital