

**BEFORE  
THE OHIO POWER SITING BOARD**

<b>In the Matter of the Application of Duke</b>	<b>:</b>	<b>Case No. 16-0253-GA-BTX</b>
<b>Energy Ohio, Inc., for a Certificate of</b>	<b>:</b>	
<b>Environmental Compatibility and Public</b>	<b>:</b>	
<b>Need for the C314V Central Corridor</b>	<b>:</b>	<b>SYCAMORE TOWNSHIP'S LIST OF</b>
<b>Pipeline Extension Project</b>	<b>:</b>	<b>ISSUES FOR CROSS-EXAMINATION</b>
	<b>:</b>	<b>OF WITNESSES AT THE</b>
	<b>:</b>	<b>EVIDENTIARY HEARING</b>
	<b>:</b>	
	<b>:</b>	
	<b>:</b>	

Pursuant to The Ohio Power Siting Board's Entry, dated December 18, 2018, Thomas J. Weidman, as President of the Board of Township Trustees of Sycamore Township ("Sycamore") by and through counsel, hereby propounds the following list of issues about which Sycamore may be interested in pursuing during cross-examination of witnesses at the evidentiary hearing set for April 9, 2019 at 10:00 a.m:

1. How many other routes were investigated besides the preferred and alternate routes and did any of those routes originate in a location other than Sycamore?
2. What efforts were made to use ODOT Interstate Highway rights of way for Pipeline location?
3. What actions were taken by the Applicant to evaluate the need for the Pipeline to be constructed through Sycamore?
4. What are the anticipated beginning and completion dates for construction in Sycamore?
5. Given the cost differences between the Preferred Route and Alternate Route and the Staff Report's recommendation of the Alternate Route, will the Applicant continue pursuing Preferred Route?
6. How does installing the Pipeline along the preferred and/or alternate route serves the public interest, convenience, and necessity in Sycamore?

7. Under what circumstances would the proposed maximum operating pressure be increased?
8. Will the Pipeline be constructed in accordance with the requirements for Transmission Lines?
9. What safety precautions are being implemented during construction of the Pipeline in Sycamore?
10. What is the process for choosing contractors and subcontractors to install and maintain the Pipeline?
11. How will the Applicant monitor the work performed by its employees, contractors, and subcontractors to ensure that all safety requirements are followed in the construction and maintenance of the Pipeline?
12. Will Sycamore have any input in the contractors and subcontractors hired?
13. What are the designs for the Pipeline markers along the proposed routes?
14. What are the proposed locations of Pipeline markers along the proposed routes and what is the procedure for determining placement of Pipeline markers?
15. What is the procedure for objecting to placement of Pipeline markers and how will those objections be handled?
16. What is the impact of permanent changes to the land and landscaping in Sycamore?
17. Will Sycamore have any input as to permanent changes to the land and landscaping in Sycamore?
18. Potential issues for property owners along the proposed routes:
  - a. What are the hours proposed for construction?
  - b. Are there any exceptions to the proposed construction hours that would extend those times?
  - c. How much notice will be provided to property owners prior to construction?
  - d. How will that notice be provided?
  - e. How will you obtain landowner approval for temporary access routes?
  - f. What is the process for determining whether existing vegetation or structures are incompatible with Pipeline maintenance?

- g. What are the limitations on planting vegetation and erecting structures along the pipeline routes in the future?
  - h. Are there any permanent impacts to structures in Sycamore?
19. What is the impact to property values due to the existence of the Pipeline in Sycamore?
20. What is the potential impact on public services, such as traffic, during Pipeline construction?
21. How will construction hours be adjusted to avoid work taking place during peak traffic hours?
22. What type of traffic management will be necessary during Pipeline installation phase?
23. Would any construction take place between Thanksgiving and New Year's Day in the Kenwood area of Sycamore?
24. How did the Applicant determine that the proposed Pipeline's preferred and alternate routes represent the minimum adverse environmental impact in Sycamore?
25. What is the procedure for determining and obtaining areas for storing excavation equipment and materials during Pipeline construction?
26. What is the procedure for disputing an area for storing equipment and materials during Pipeline construction?
27. How will the Pipeline route be changed if the applicant cannot obtain the easements necessary for the current Pipeline route?
28. How will the placement of the Pipeline affect Sycamore's ability to perform future construction at or near the Pipeline, including all limitations on future construction and road work?
29. How will placement of the Pipeline affect a property owner's ability to perform future construction at or near the Pipeline, including all limitations on future construction?
30. What are the permanent restrictions on the future use of the Pipeline right-of-way in Sycamore?
31. How will landowners be compensated for restrictions on future use of property?

32. What will be done and what is the timeframe for returning property to its original condition after construction is complete?
33. Will there be a complaint resolution procedure to address grievances resulting from project construction and operation of the Pipeline?
34. Who is responsible for monitoring properties for settling, cracking, and/or sinking during construction or operation of the Pipeline?
35. What is the procedure if settling, cracking, and/or sinking occurs during construction or operation of the Pipeline?
36. What safety precautions are being implemented to prevent explosions or leaks during operation of the Pipeline?
37. What is the potential size, scale, and geographic impact of an explosion or leak in Sycamore involving the Pipeline?
38. What safety precautions will be implemented to prevent excavators from striking or exposing the Pipeline in the future?
39. What is the emergency response plan in the event of an emergency, such as a leak, explosion, or other catastrophic event, in Sycamore?
40. What is the required evacuation zone in the event of a leak or other catastrophic event in Sycamore?
41. How will people be notified if an evacuation becomes necessary?
42. What steps has the Applicant taken to coordinate its emergency response plan with the Hamilton County Sheriff's Department, and Sycamore Township EMS and Fire Department and Sycamore Township Maintenance Department?
43. Will personnel from Sycamore need any specialized training in order to respond under the Applicant's emergency response plan? If so, what is the nature of such training?
44. How will a leak, explosion, or other catastrophic event involving the Pipeline affect service delivery for Sycamore residents?

In addition to the above issues, Sycamore Township hereby incorporates, as if fully restated herein, and reserves the right to question any witnesses, with respect to any and all issues addressed in any other intervening party's list of potential issues for cross-examination of witnesses and any conditons or issues raised or addressed in the administrative hearing or in the Amended Staff Report of Investigation dated March 5, 2019 as it may be amended or supplemented from time to time.

Respectfully submitted,

/s/ R. Douglas Miller

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## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on all parties who have electronically subscribed to this case through the Docketing Information System of the Public Utilities Commission of Ohio and the OPSB on this 22<sup>nd</sup> day of March, 2019. The docketing division's e-filing system will electronically serve notice of the filing of this document on the following parties:

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The following parties have not been served via the email notice and have been served by regular U.S. Mail on the same date indicated above:

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Thomas A. and Patricia H. Kreitinger  
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/s/ R. Douglas Miller  
R. Douglas Miller (0033343)  
Counsel for Sycamore Township

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

**Commission of Ohio Docketing Information System on**

**3/22/2019 12:08:34 PM**

**in**

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

Summary: Notice of Sycamore Township's List of Issues for Cross-Examination at the Evidentiary Hearing electronically filed by Mr. R. Douglas Miller on behalf of Sycamore Township, Hamilton County, Ohio and Weidman, Thomas J. Mr.