## 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 Central Corridor Pipeline Extension Project Case No. 16-0253-GA-BTX

THE VILLAGE OF GOLF MANOR, OHIO'S LIST OF ISSUES FOR

CROSS-EXAMINATION OF

WITNESSES AT THE EVIDENTIARY

HEARING

:

Pursuant to The Ohio Power Siting Board's Entry, dated December 18, 2018, the Village of Golf Manor, Ohio ("Golf Manor") by and through counsel, hereby propounds the following list of issues about which Golf Manor 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. Other routes that were investigated besides the preferred and alternate routes.
- 2. Precise proposed alternate route as it relates to the Village of Golf Manor, i.e. is the alternate route located east or west of the railroad tracks as it travels south from Losantiville road.
- 3. Actions taken by the Applicant to eliminate the need for the pipeline to be constructed adjacent to Golf Manor.
- 4. Anticipated beginning and completion dates for pipeland construction.
- 5. Circumstances under which the proposed maximum operating pressure would be increased.
- 6. Safety precautions to be implemented during construction of the Pipeline.
- 7. Process for choosing contractors and subcontractors to install and maintain the Pipeline.

- 8. Manner in which the Applicant will 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
- 9. Input Golf Manor will have regarding contractors and subcontractors hired.
- 10. The impact of permanent changes to the land and landscaping in Golf Manor/adjacent to the Village of Golf Manor.
- 11. Input Golf Manor will have as to permanent changes to the land and landscaping in Golf Manor/adjacent to the Village of Golf Manor.
- 12. Particulars regarding construction, such as: Hours proposed for construction/notice to property owners prior to construction/effect on traffic of construction etc.
- 13. Impact to property values due to the existence of the Pipeline in Golf Manor/adjacent to the Village of Golf Manor.
- 14. Environmental impact to the Village of Golf Manor.
- 15. Effect on pipeline route if the applicant cannot obtain the easements necessary for the current pipeline route.
- 16. Manner in which placement of the pipeline will affect Golf Manor's ability to perform future construction at or near the pipeline, including all limitations on future construction and road work.
- 17. Affect of placement of the pipeline upon a property owner's ability to perform future construction at or near the Pipeline.
- 18. Landowners compensation for restrictions on future use of property.
- 19. Timeframe for returning property to its original condition after construction is complete.
- 20. Complaint resolution procedure to address grievances resulting from project construction and operation of the Pipeline.

- 21. Responsibility for monitoring properties for settling, cracking, and/or sinking during construction or operation of the pipeline.
- 22. Procedure if settling, cracking, and/or sinking occurs during construction or operation of the Pipeline.
- 23. Safety precautions implemented to prevent explosions or leaks during operation of the Pipeline.
- 24. The potential size, scale, and geographic impact of an explosion or of the pipeline as it relates to the Village of Golf Manor.
- 25. Consideration given for emergency assets, EMS, fire, police, located within the blast zone of the pipeline in the event of an explosion of the pipeline.
- 26. Safety precautions that will be implemented to prevent excavators from striking or exposing the pipeline.
- 27. Emergency response plan in the event of an emergency, such as a leak or explosion or the pipeline/co-ordination of such plan with the local EMS, fire department, police department.
- 28. Evacuation zone for Golf Manor in the event of a leak or other catastrophic event.
- 29. Notification procedure if an evacuation is necessary.
- 30. The nature of any special training for the Village of Golf Manor to implement applicant's emergency response plan.
- 31. Cost/who will pay for such specialized training to implement applicant's emergency response plan.

In addition to the above issues, Golf Manor 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 conditions or issues raised or addressed 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/ Robert T. Butler

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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 22nd 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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Summary: Text The Village of Golf Manor, Ohio's List of Issues For Cross-Examination of Witnesses at the Evidentiary Hearing electronically filed by Mr. Robert T. Butler on behalf of The Village of Golf Manor, Ohio