SOUTH DAKOTA PUBLIC UTILITES COMMISSION

CASE NO. EL05-022

IN THE MATTER OF THE APPLICATION BY OTTER TAIL POWER COMPANY

ON BEHALF OF THE BIG STONE II CO-OWNERS

FOR AN ENERGY CONVERSION FACILITY SITING PERMIT FOR THE

CONSTRUCTION OF THE BIG STONE II PROJECT

DIRECT TESTIMONY

OF

RANDALL M. STUEFEN

PROFESSOR EMERITUS

UNIVERSITY OF SOUTH DAKOTA

MARCH 15, 2006



| 1 | | TESTIMONY OF RANDALL STUEFEN | |
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1 **BEFORE THE SOUTH DAKOTA PUBLIC UTILITIES COMMISSION** 2 DIRECT TESTIMONY OF RANDALL STUEFEN I. **INTRODUCTION** 3 4 **O**: Please state your name and business address. 5 A: Randall M. Stuefen, 813 Valley View Drive, Vermillion, South Dakota 57069. 6 **O**: By whom are you employed and in what capacity? 7 A: My current university status is Professor Emeritus at the University of South Dakota. I 8 retired from the Business Research Bureau, University of South Dakota in December of 2004. 9 From 1983 to 2004, I served as either Associate Director of the Business Research Bureau or 10 Director of Research at the Business Research Bureau. I now own and conduct research as 11 Stuefen Research, LLC. (Stuefen Research, LLC, was Stuefen Research at the time the analysis

- 12 for the Big Stone II Application was conducted.) Stuefen Research, LLC is located in13 Vermillion, South Dakota.
- 14 Q: Describe your educational background.

A: I earned a Bachelor of Science degree from South Dakota State University in economics
in 1975, and earned a Master of Science Degree from South Dakota State University in
economics in 1980.

18 Q: What is your employment history?

19 A: While at the University, it was my task to contract with government agencies, 20 organizations and businesses to conduct research as needed on a project basis. I would 21 participate in all aspects of each project. I also taught marketing and statistics in the mid 1980s 22 at the School of Business. I currently work on and contract for projects under the entity Stuefen

Research, LLC. Stuefen Research, LLC partners with the Business Research Bureau on selected
 projects for the purpose of conducting research.

3 Q: What work experience have you had that is relevant to your testimony?

A: I have conducted a broad range of survey research that falls under the headings of issue
research, marketing research, prevalence of problem gambling surveys, employee, constituency
or customer satisfaction surveys, fair market rents in housing, bank entry statistical analysis and
management research. I have conducted economic impact analysis for the state's Small Business
Development Center, University of South Dakota, the state's nursing home industry, ethanol
related agricultural industries, child day care services and the Big Stone II project.

10 Q: What classes and other training have you taken related to the subject of your 11 testimony?

A: I have attended the basic and advanced training sessions conducted by Minnesota IMPLAN Group, Inc. ("MIG, Inc."), which provides training, tools and resources for statistical economic analysis. MIG, Inc. holds regularly scheduled IMPLAN® training sessions for both beginning and advanced IMPLAN users. The introductory workshop covers basic input-output economics, impact analysis, and the IMPLAN software. The advanced course reviews the introductory course and continues building on the users' modeling skills.

18 II. PURPOSE AND SUMMARY

19 Q: What is the purpose of your testimony?

A: The purpose of my testimony is to explain the potential economic impacts of the proposed Big Stone Unit II. I prepared a written report estimating the economic impacts on the South Dakota economy and the economy of a four county area including Grant and Codington

1 counties in South Dakota, and Big Stone and Lac Oui Parle counties in Minnesota. The Minnesota counties were chosen for inclusion because of their close proximity and likelihood of 2 3 economic participation. Codington County was chosen because it is the largest trade center in 4 the area and it is expected to benefit from the plant's construction.

5 **O**:

Please summarize your testimony.

6 Both the state and the local communities are expected to experience job growth and A: 7 economic growth during the construction of the proposed Big Stone Unit II and for the long term 8 during its operation and maintenance. This is a large construction project that will impact the 9 area over a four year period. The ongoing increase in plant operations employment will benefit 10 the area for years to come. There appear to be no material adverse effects on economic or 11 employment factors as related to the construction and operation of the proposed Big Stone Unit II.

12

13 III. **ECONOMIC IMPACTS**

14 **O**: What was your involvement in the application process for the proposed Big Stone Unit II? 15

16 A: I was tasked with estimating the four county local and state economic impact of 17 constructing the Big Stone II power plant. In addition, a longer-term or ongoing four county 18 economic impact of new employees being hired to operate the plant was estimated.

19 **O**: Did you prepare any written studies/work product that is reflected in the 20 **Application?**

A: Yes. I prepared a report titled the "Economic Impact of Constructing the Big Stone II
 Power Plant" and a one page summary titled the "Economic Impact Highlights of Big Stone II
 Power Plant Construction," both of which are included as Exhibit C of the Application.

Q: Do you want to make any changes to your initial report, entitled the "2004
Economic Impact of Constructing the Big Stone II Power Plant" by Stuefen Research and
Business Research Bureau and is Exhibit C of the Application?

7 A: Yes.

8 Q: What are the changes?

9 The statistical model assumes that a certain amount of architectural design work A: 10 comprises the employment created by the project. However, the jobs performed by Burns and 11 McDonnell should be excluded from the calculations for the number of jobs and economic 12 impact, because those jobs are based in Kansas City, Missouri, not South Dakota. Also, the 13 treatment of inflation as it pertains to state employment calculations was corrected, so that the 14 2008 dollars were deflated to 2001 dollars to properly fit the data in the model and calculate the 15 employment multiplier. An updated "Economic Impact Highlights of Big Stone II Power Plant 16 Construction, Updated February 15, 2006" is attached to the end of this testimony as Applicants' 17 Exhibit 26-A.

18 Q: Why are the changes necessary?

A: Data for Burns and McDonnell was included in my original, previously submitted
 calculations. When I was reviewing my data and calculations for preparation of this testimony, I
 realized that the Burns and McDonnell jobs should be excluded because they are based in Kansas

City and not at the Big Stone II site in South Dakota. I also realized that the 2008 dollars had not
 been deflated to 2001 which would have the effect of inflating the employment multiplier.

3

Q: What is the effect of these changes to your calculations?

A: The local four-county economic impact during construction was originally estimated at \$675 million; the revised estimate is \$672.8 million, which is a difference of \$2.2 million. The local job growth was originally estimated at 1,997 full and part time jobs in the local communities; the revised calculation is 1,844 full and part time jobs, which is a difference of 153 jobs. The average number of jobs was originally estimated at 1,137 per year for each of four years; the revised number is 1,098, a difference of 39.

10 The revised numbers for the state benefit during construction is an economic impact of 11 \$745.1 million, compared to the original estimate of \$788 million, a decrease of \$42.9 million. 12 The state benefit for job growth of full and part time jobs during construction is estimated at 13 2,291, originally estimated at 3,322. The long term local benefits remain unchanged.

14 Q: Do the changes affect the results of your analysis in a material way?

A: No. These changes are not significant for purposes of an overall analysis. The net result
for job creation and economic impact is overall still positive.

Q: What general sources of information were used to identify the time frame for constructing the plant and the expected workforce number for doing the work?

A: The time frame for constructing the facility was identified in an Otter Tail Power
Company news release dated October 11, 2004. It states that the power plant will require a fouryear construction period and that it is expected to be on line in 2011. Otter Tail Power Company
projected the start of construction in April 2007 with an expected completion date of April 2011.

While construction is expected to get underway in 2007, it is assumed that the peak employment
 year will not be 2007. It is assumed that the peak year of construction will be in 2008 or begin in
 2008 and extend into 2009. Because of this assumption, the study refers to dollar cost estimates
 in 2008 dollars.

5 Q: Did you have information regarding the number of people to be directly involved in 6 the construction of the plant?

A: Yes, I used two sources of information regarding construction employment numbers. The October 11, 2004 press release indicated that approximately 625 people would be employed over the four year period yielding a total of 2,500 workers. The press release indicated that in the peak year a workforce of 1,500 people will be employed. Additional information provided by Burns & McDonnell, through representatives of Otter Tail Power Company, supported a four year workforce of 2,550 using 2000 paid hours in a typical 2080 hour work year. The 2,550 employee estimate is used in the analysis.

Q: Do you expect that all people employed to construct the Big Stone II power plant will be from the four county area near the Plant?

16 A: No, workers from outside the area are expected to work on the project. No estimate of 17 the proportion of workers to expect from outside the area of interest was attempted. It is 18 assumed in the impact estimates that fifty percent of the workers will be from outside these areas 19 and spend their income outside the four county area and outside the state of South Dakota. No 20 historical data was found to support the assumption.

21 Q: What were the primary sources of construction information?

A: Burns & McDonnell is the primary source of construction cost information used in the analysis. The information was provided to me through a representative of Otter Tail Power Company. In addition, the company's web site was a good source of information. The staffing information for the ongoing operations was estimated in the October 11, 2004 press release previously mentioned at thirty to forty employees. After further discussion with a representative of the Otter Tail Power Company, the number thirty-five ongoing employees was used to formulate the estimates.

8 Q: What are the expected construction costs for building Big Stone Unit II?

9 A: The total project cost of plant construction is estimated at approximately one billion 10 dollars but not all construction costs will impact on the local or state economies. Out-of-state 11 expenditures on the procurement of equipment and component parts and money set aside for 12 escalation in the procurement process are not included in the local or state economic impact 13 estimates except as specifically identified. Construction costs associated with the plant are 14 estimated by Burns and McDonnell to be over six hundred and sixteen (616.3) million dollars. 15 In addition, the Engineering and Management fee of thirty-eight (38.0) million dollars will be 16 spent outside of South Dakota or the local economy including two counties in Minnesota. This 17 money is treated in the economic impact analysis as were the procurement expenditures which is 18 a deduction from construction costs. Also, escalation funds are excluded because the money 19 does not directly result in construction activity. The forty-six and one half (46.5) million dollars 20 are held in reserve to pay for construction expenses resulting from inflation or errors in the 21 estimated cost of an activity over the life of the construction project. Escalation funds are not 22 considered when calculating the number of jobs that the project creates. Direct construction

costs were estimated at five hundred thirty-one million seven hundred thousand dollars
 (\$531,700,000). A summary of findings follows.

3 Q: Can you summarize the estimates of economic activity associated with the
4 construction of Big Stone Unit II?

5 A: Yes, the general model inputs and economic activity associated with the plants 6 construction are as follows:

- 7 General Model Inputs
- 8 Project Construction Period: April 2007 April 2011
- 9 Total Project Cost: Approximately \$1 billion
- 10 Direct Construction Costs: Approximately \$531.7 million
- 11 Local Four County Benefit During Construction (2008 dollars)
- 12 (Updated) Local Economic Impact: \$672.8 million during construction
- 13 State Benefit During Construction (a broader perspective in 2008 dollars)
- 14 (Updated) South Dakota Economic Impact: \$745.1 million during construction
- 15 Long-Term Local Benefit (2004 dollars)
- 16 (Updated) Long term local economic impact: \$3.6 million / year of new income to the four
- 17 county area not including on-going contractor support for plant activities

18 Q: Why is the estimation of economic activity or economic impact analysis important?

A: Economic impact analysis is important in that it shows the financial benefit of a project such as the construction of Big Stone Unit II to other businesses in the defined area and the households of not only people that work directly in the construction of the plant but also the benefit to other sectors within an economy and the people that have jobs and work in the area. It

shows that the final impact of the financial injection is greater than the initial investment in the
 plant as the money makes its way through the economy.

3 Q: Does your economic impact analysis consider the factors set forth in ARSD
4 20:10:22:23 (Community Impact)?

5 A: Yes, as presented in Section 5.1 and Exhibit C of the Application, and in regard to the 6 two levels of geography addressed in the study – the four county area and the state. The four 7 counties selected for the area are those that would be impacted by the proposed Big Stone Unit II 8 project and could be defined as a "Greater Community" serving the people participating in 9 construction activities.

10 Q: Did you review other studies or work product in making your evaluation and
11 conclusions?

12 A: Other economic impact studies were reviewed but no other study was relied upon for this13 analysis.

14 Q: Does this plant pose an economic threat to the four county area or the state of South
15 Dakota?

16 A: No.

17 IV. EMPLOYMENT IMPACTS

18 Q: Did you prepare any written studies/work product that are reflected in the

- 19 Application relating to employment impacts?
- 20 A: Yes, as presented in Section 5 and Exhibit C of the Application.
- 21 Q: Did your analysis consider the factors set forth in ARSD 20:10:22:24?

A: Yes. I looked at the estimated number of jobs, the job classifications, the estimated employment expenditures, both for the period of construction and for the estimated operating life of the proposed facility. I considered the adequacy of local labor resources to meet temporary and permanent job requirements for both construction and operation of the proposed Big Stone Unit II, and I considered that outside labor forces not permanently located in South Dakota might be utilized as well for the construction of the proposed Big Stone Unit II. I also analyzed the types of jobs and special skills that would be required.

8 Q: Describe the results of your work.

9 A: The estimation of employment impacts is a function of the direct cost of construction and 10 available employment information about the project. The direct cost of construction for the Big 11 Stone Unit II is 531.7 million dollars which is the amount used in the economic activity analysis.

12 Local Four County Benefit During Construction (2008 dollars)

| 13 | Local Job Growth: | 2,550 Full Time Equivalent positions during construction | |
|----|---|--|--|
| 14 | | 1,844 Full and part time jobs in the communities | |
| 15 | | An average of 1,098 per year for four years | |
| 16 | State Benefit During Construction (a broader perspective in 2008 dollars) | | |
| 17 | State Job Growth: | 2,550 Full Time Equivalent positions during construction | |
| 18 | | 2,291 Full and part time jobs in the communities | |
| 19 | | An average of 1,210 per year for four years | |
| 20 | Long-Term Local Benefit (2004 dollars) | | |
| 21 | Long term local job growth: | 35 Full Time Equivalents employed in operations | |
| 22 | | 29 Full and part-time positions in the communities | |

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1 Q: Where did you obtain information relevant to your work?

A: The cost data provided by Burns & McDonnell is the information base for the following economic impact analysis. Other information was obtained from the Otter Tail Power Company's website and representatives of Otter Tail. The construction cost information from these sources and staffing information from Otter Tail Power Company was used in an IMPLAN model to formulate the employment estimates.

7 Q: What sectors of the economy will benefit from the economic activity resulting from

8 the construction of the plant?

9 A: The top fifty sectors that are expected to benefit from the economic activity measured by 10 full and part time employment impacts is attached as Applicants' Exhibit 26-B. The table 11 presents the estimated indirect impacts and the induced impacts from that economic activity.

12 Q: Does this conclude your testimony?

13 A: Yes.