
From: Cody Honeywell
Sent: Friday, March 31, 2023 3:02 PM
To: May Va Lor <mlor@liuna.org>; Brett Koenecke <brett@mayadam.net>
Cc: Tony Penn <gpldctp@gmail.com>
Subject: RE: HP22-001 -- Interrogatories of the Great Plains Laborers' District Council to Summit Carbon Transport LLC

Good afternoon May Va Lor,

Please see the attached responses. Thanks and have a good weekend.

Cody Honeywell



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From: May Va Lor <mlor@liuna.org>
Sent: Wednesday, March 1, 2023 2:54 PM
To: Brett Koenecke <brett@mayadam.net>; Cody Honeywell <cody@mayadam.net>
Cc: Tony Penn <gpldctp@gmail.com>
Subject: HP22-001 -- Interrogatories of the Great Plains Laborers' District Council to Summit Carbon Transport LLC

Dear Sirs,

On behalf of the Great Plains Laborers' District Council, and intended as service upon you, are the attached Interrogatories of the District Council to Summit Carbon Transport LLC in the above-referenced case. Please return your answers by March 31st consistent with the procedural schedule to this email address.

Sincerely,

--
May Va Lor
Laborers International Union of North America
905 16th Street NW
Washington, DC 20006
Cell: 202-251-3108

EXHIBIT A-64

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF
SOUTH DAKOTA**

In the Matter of the Application by SCS Carbon Transport LLC for a Permit to Construct a Carbon Dioxide Transmission Pipeline	Docket No. HP22-001 Second Set of Interrogatories of the Great Plains Laborers' District Council to Summit Carbon Transport LLC
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SCS Carbon Transport, LLC ("SCS") submits the following responses to the Interrogatories of Great Plains Laborers' District Council concerning the economic impact of the Summit Carbon Solutions, LLC ("Summit") pipeline project:

INTERROGATORY NO. 1: Please state the name of each person answering these interrogatories and include for each person their name, address and contact information.

Response:

Erik Schovanec, Senior Director of Pipeline and Facilities
Jeff Cather, Director of Corporate Finance
2321 North Loop Drive, Suite 221
Ames, IA 500510
Phone: 515-531-263

INTERROGATORY NO. 2: Please provide copies of all responses to Interrogatories and Requests for Production of Documents made by other parties. Please provide the responses in the same form as provided to the original requesting party. Please also provide supplemental responses to this request through the course of the proceeding.

Response:

See answer to Interrogatory No. 2 in SCS's Responses to the First set of Interrogatories of Great Plains Laborers' District Council. No other responses have been made.

INTERROGATORY NO. 3: Please refer to SCS Carbon Solutions, LLC's Responses to Interrogatories of the Great Plains Laborers' District Council Interrogatory Nos. 3 and 14. According to the Applicant, the IMPLAN model used to estimate the economic benefits to the state of South Dakota assumes 4.1% of workers employed to build the project will come from outside of the state, and 96% of the workforce will be South

Dakota residents.

- a. **Does the Applicant agree with the IMPLAN model's assumption that 96% of the construction workforce will be South Dakota residents?**
- b. **Has the Applicant communicated a goal for local or state hiring in South Dakota? Please provide a copy of those communications.**
- c. **Has the Applicant communicated a goal for local or state hiring in other states across the project footprint? Please provide a copy of those communications.**
- d. **Please specify the actions the Applicant and its contractors have taken or plan to take to recruit South Dakota residents for construction jobs on the proposed project.**

3a. IMPLAN's estimates of in-commuting rates are derived from the US Census Bureau's Journey-to-Work dataset, which provides data on commuting flows across counties, as well as US Bureau of Economic Analysis' Regional Economic Accounts data on earnings flows and internal IMPLAN adjustments. SCS has no basis to agree or disagree with this IMPLAN model assumption.

3b. Reference estimates in the EY report for Direct hires, Contract hires, and Induced hires in South Dakota and the other 4 states.

3c. See response to 3b.

3d. The South Dakota scope will be executed by both union and non-union contractors. Union contractors have a stated objective of employing South Dakota residents (~50%) to staff construction spreads (pipeline) and crews (facilities). Non-union contractors will bring core personnel from out of state and employ South Dakota residents to fully resource each spread and crew needs. It's important to note that significant employment opportunities during construction extend to ancillary businesses and service providers. Due to the concern that the forecasted demand for construction workers in 2024 and 2025 will exceed the availability of South Dakota resources, SCS has completed a labor study identifying potential deficiencies. Summit is initiated discussions with contractors to recruit skilled personnel from trade schools, tech schools, etc.

INTERROGATORY NO. 4: Please refer to SCS Carbon Solutions, LLC's Responses to Interrogatories of the Great Plains Laborers' District Council Interrogatory Nos. 4d and 6b. According to Tab: Table 1 Employment by Industry, an average of 1215.45 annual jobs (52% of total jobs) will be created in industry 56, construction of other new non-residential structures. According to Tab: Table 2 Average Income, the average wage and salary for jobs in industry 56 is \$31,711, or \$15.25 per hour in South Dakota.

- a. **Does the Applicant agree with the IMPLAN model's assumption that the wage and salary for construction workers on the proposed project will average \$31,711 annually?**
- b. **Has the Applicant or its designee(s) performed its own analysis to determine whether the average wages and salaries used by the IMPLAN model are**

consistent with actual wages paid to workers on similar projects? Please provide a copy of those documents.

- c. What information does Summit have regarding the wages and benefits that will be paid to construction workers on the project? Please provide a copy of those documents.**

Response:

4a. The IMPLAN model utilizes data sourced from the Bureau of Labor Statistics' (BLS) Census of Employment and Wages (CEW) to serve as the source for Wage and Salary Employment and Income estimates for most IMPLAN sectors. SCS has no basis to agree or disagree with this IMPLAN model assumption.

4b. No.

4c. SCS was not given information by the construction contractors pertaining to wages and benefits.

INTERROGATORY NO. 5: Please refer to SCS Carbon Solutions, LLC's Responses to Interrogatories of the Great Plains Laborers' District Council Interrogatory No. 13.

- a. Please provide the names of any South Dakota-based companies with whom the Applicant or its prime contractors have executed contracts to build the project facilities in the state.**
- b. Please provide copies of documents used by the Applicant or its prime contractors to outreach to Native American- and Tribally-owned businesses and individuals.**
- c. Please provide copies of documents used by the Applicant or its prime contractors to outreach to local and state construction workers in South Dakota.**
- d. Please provide an update of efforts by the Applicant to fund trade school programs to bolster employment opportunities for South Dakotans?**

Response:

5a. To date, a contract has been executed with Pumpco Inc to build project facilities in South Dakota.

5b. Sixty-two Tribes were contacted regarding the Summit Carbon Project. Summit has conducted webinars outlining the project and Summit's Tribal outreach program, provided Project maps and associated GIS files, and copies of the cultural resource reports for their review and comments.

Since the cultural resources surveys started in September 2021 a total of 36 Tribal Monitors from 9 Tribes participated in fieldwork. Those Tribes include the Rosebud

Sioux, Sisseton Wahpeton Oyate,-Mandan, Hidatsa and Arikara Nation – Three Affiliated Tribes, Northern Cheyenne, Mille Lacs Ojibwe, Turtle Mountain Band of Chippewa, Yankton Sioux, Little Shell Chippewa, and Assiniboine and Sioux Tribes of Fort Peck. Where Summit has been granted permissions to access a property, the Tribes are also afforded the opportunity to accompany archaeological crews along the entire route, or to conduct their own studies if permitted by the landowner.

In addition to direct outreach to each of these 62 Tribes, Summit Carbon Solutions has also attended Tribal-focused conferences to meet Tribal leaders and representatives face-to-face and discuss the project and the opportunities for Native American- and Tribally-owned businesses to participate.

5c. Since the contract referenced in 5a was recently executed and Summit’s current schedule forecasts the ramp up of construction will begin in 2Q, 2024, Summit will begin outreach to local construction workers in 3Q, 2023.

5d. Summit continues to work with high schools to explore opportunities to aid and contribute to a school’s workforce ready programs. Examples of this outreach include Summit donating a welder and its components to the Aberdeen, South Dakota ATEC school and Sioux Center, Iowa High School. Along with those donations, Summit Project Managers and Construction Managers spoke to students in the class about potential career paths and opportunities in the field. Additionally, in Wayne, Nebraska, we donated plant science kits to their ag tech program through the Future Farmers of America.

INTERROGATORY NO. 6: Please refer to SCS Carbon Solutions, LLC’s Responses to Interrogatories of the Great Plains Laborers’ District Council Interrogatory No. 17. The Applicant contends the project will qualify for the Section 45Q enhanced tax credit, which provides \$85 per ton of CO2 captured and permanently stored if requisite prevailing wage and registered apprenticeship standards are met.

- a. Will the Applicant seek any exclusions from 45Q(h)(2) requirements on the proposed project? If yes, please detail the basis for the exemption(s).**
- b. Will the Applicant require its pipeline construction contractors to pay laborers and mechanics prevailing wages and meet registered apprenticeship utilization goals as required by 45Q(h)(2)? Please provide documents detailing this requirement.**
- c. Please provide a list of all South Dakota-based registered apprenticeship programs the Applicant and/or its construction contractors have outreached to, or intend to outreach to.**

Response:

6a. Requirements of 45Q(h)(2) are not applicable to the scope of the application

6b. Requirements of 45Q(h)(2) are not applicable to the scope of the application.

6c. None, currently.

INTERROGATORY NO. 7: Please refer to SCS Carbon Solutions, LLC's Responses to Interrogatories of the Great Plains Laborers' District Council Interrogatory No. 17.

- a. Please provide an update to this interrogatory, and identify the contractors who have been awarded a contract for engineering or construction related activities for the project.**
- b. Please identify which construction contractors have experience building transmission or lateral pipelines in South Dakota, and the most recent pipeline project completed by construction contractor in the state.**

7a. See the response in 5a for the construction contractor that is currently under contract for work in South Dakota. The following are engineering-related contractors that are providing support to the Project and a description of their scope of work:

- Gulf Interstate Engineering
 - Overall pipeline engineering contractor
- Terracon
 - Geotech investigations and geohazard analysis
- Geosyntec
 - River migration and scour analysis
- TetraTech Rooney
 - Pump station engineering contractor
- ITI
 - Pipe specification development and fracture control plan
- Milbar
 - Hydrotest engineering support and design
- Strata
 - Control systems and SCADA
- Lake Superior Consulting
 - Construction standards, weld procedure development, engineering construction support
- Atmos
 - Leak detection
- Pipeline Control and Services
 - Cathodic protection and AC mitigation design
- Audubon
 - Dispersion model

[CONTINUED ON NEXT PAGE]

7b. Pumpco has not installed pipelines in South Dakota. However, they do have experience in North Dakota and Wyoming, having installed over 115 miles of pipe, which are states similar in climate, terrain, etc. In total, Pumpco has installed over 7,300 miles of pipe across the U.S. and over 1,700 miles of pipe 24” and larger, which is applicable to their scope in South Dakota.

/s/ Erik Schovanec
Erik Schovanec

/s/ Jeff Cather
Jeff Cather

CERTIFICATE OF SERVICE

Cody L. Honeywell of May, Adam, Gerdes & Thompson LLP hereby certifies that on the 31st day of March, 2023, he served electronically served through electronic mail a true and correct copy of the foregoing in the above-captioned matter to the following at their last known address, to-wit:

May Va Lor
Representative, Great Plains Laborers’ District Council
mlor@liuna.org

/s/ Cody L. Honeywell
CODY L. HONEYWELL