

**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 SCS Answers to Third Set of Interrogatories of the Great Plains Laborers' District Council to Summit Carbon Transport LLC
---	--

SCS Carbon Transport, LLC ("SCS") submits the following responses to the Interrogatories of Great Plains Laborers' District Council concerning 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:

James Powell, Chief Operating Officer
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 and Staff. 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 provide copies of all Confidential Information filed by the Applicant with the Commission or provided through discovery by Applicant.

Response: SCS objects to this request as it calls for confidential information.

INTERROGATORY NO. 4: Has the pipeline route been altered since the Applicant filed its Supplemental Application? If yes, please provide an updated Amended Appendix 1 and other relevant appendices.

Response: Yes. In the near future, SCS intends to provide all interested parties a listing of the changes. The route changes are generally small shifts in the centerline and are primarily required to accommodate landowner requests, to improve constructability, and to avoid culturally/biologically sensitive sites identified during survey activities.

INTERROGATORY NO. 5: Please refer to Amended Appendix 1, Construction Spread Overview Map filed with the Supplemental Application, or an updated Appendix 1 per Interrogatory 4. Please also refer to SCS Carbon Transport LLC's Responses to Interrogatories, Second Set, of the Great Plains Laborers' District Council Interrogatory Nos. 3d and 5a.

- a. Please identify the construction spreads that have been awarded to Pumpco Inc, whether those pipelines are laterals, trunk lines, or main lines, and the diameter of those pipelines.
- b. Please identify the construction spreads that have been awarded to union contractors, please identify the union contractor, whether those pipelines are laterals, trunk lines, or main lines, and the diameter of those pipelines.
- c. Please identify any additional construction spreads that have been awarded to a contractor, please list the name of the contractor, whether those pipelines are laterals, trunk lines, or main lines, and the diameter of those pipelines.
- d. Please identify the construction spreads that have not been awarded, whether those pipelines are lateral, trunk lines, or main lines, and the diameter of those pipelines.
- e. Please provide a timeline for when all construction contracts for pipelines will be awarded.

Response: SCS objects to this Interrogatory because it calls for irrelevant information and is not reasonably calculated to lead to admissible discovery. SCS also objects as it seeks the disclosure of proprietary or confidential business information or information subject to trade-secret protections.

INTERROGATORY NO. 6: The EY report includes capital expenditures for five phases of construction – pipeline, capture facilities, sequestration facilities, pump stations, and the project management team.

- a. Please identify any companies with whom the Applicant or its designee has executed contracts to build capture facilities, and pump stations.
- b. Please identify which companies have existing operations in South Dakota.
- c. Please provide a timeline for when all construction contracts for capture facilities and pump stations will be awarded.

Response: SCS objects to this to this Interrogatory because it calls for irrelevant information and is not reasonably calculated to lead to admissible discovery. SCS also objects as

it seeks the disclosure of proprietary or confidential business information or information subject to trade-secret protections.

INTERROGATORY NO. 7: Please refer to SCS Carbon Transport LLC's Responses to Interrogatories, Second Set, of the Great Plains Laborers' District Council Interrogatory Nos. 3d and 5a.

- a. What percentage of total pipeline miles in South Dakota has been awarded to Pumpco Inc.?**
- b. Has Pumpco provided an estimate of the number of core personnel from out of state it will employ? If yes, what is the estimate, and what percentage of all personnel will be core out of state workers?**
- c. Has Pumpco provided the Applicant with a staffing plan? If yes, please provide a copy of the staffing plan.**

Response: SCS objects to this to this Interrogatory because it calls for irrelevant information and is not reasonably calculated to lead to admissible discovery. SCS also objects as it seeks the disclosure of proprietary or confidential business information or information subject to trade-secret protections.

INTERROGATORY NO. 8: Please list all registered apprenticeship programs Pumpco sponsors in South Dakota, North Dakota, Nebraska, Iowa, and Minnesota for all apprenticeable occupations on the project.

Response: SCS objects to this Interrogatory because it is vague, ambiguous, and unduly burdensome by seeking information related to third party entities that are not parties to this docket.

INTERROGATORY NO. 9: Please refer to SCS Carbon Transport LLC's Responses to Interrogatories, Second Set, of the Great Plains Laborers' District Council Interrogatory No. 3d.

- a. Please provide a copy of the labor study referenced in the response.**
- b. Please provide by state the total pipelines miles, and percentage of pipeline miles that will be awarded to union contractors, and the total pipelines miles, and percentage of pipeline miles that will be awarded to non-union contractors for all five states covered by the project.**

Response: SCS objects to this to this Interrogatory because it calls for irrelevant information and is not reasonably calculated to lead to admissible discovery. SCS also objects as it seeks the disclosure of proprietary or confidential business information or information subject to trade-secret protections.

INTERROGATORY NO. 10: Please refer to SCS Carbon Transport LLC's Responses to Interrogatories, Second Set, of the Great Plains Laborers' District Council Interrogatory No. 5. Please provide copies of outreach materials Summit has provided to local construction workers, tribes, schools, or other organizations.

Response: SCS has not received a permit from the South Dakota Public Utilities Commission and construction will not commence until 3Q 2024. As such, SCS has not performed outreach to construction workers, schools, and other organizations. However, SCS has completed informal discussions with Emergency Planners, first responders, and other stakeholders. After receipt of a permit to construct from the SD PUC, SCS will work with construction contractors to confirm the source of personnel and opportunity for employment of area residents as well as the opportunity to provide services.

Communication with Tribes is confidential and will not be shared.

INTERROGATORY NO. 11: Please refer to SCS Carbon Transport LLC's Responses to Interrogatories, First Set, of the Great Plains Laborers' District Council Interrogatory No. 17, and Responses to Interrogatories, Second Set, of the Great Plains Laborers' District Council Interrogatory No. 6.

- a. With respect to the project qualifying for \$85/per ton of CO₂ captured and sequestered under 45Q, will workers employed to construct, alter, or repair the project's lateral pipelines be paid prevailing wages? If not, please provide the basis for why the Applicant believes lateral pipelines are excluded from 45Q requirements.
- b. With respect to the project qualifying for \$85/per ton of CO₂ captured and sequestered under 45Q, will workers employed to construct, alter, or repair the project's lateral pipelines be covered by the apprenticeship requirements? If not, please provide the basis for why the Applicant believes lateral pipelines are excluded from 45Q requirements.
- c. With respect to the project qualifying for \$85/per ton of CO₂ captured and sequestered under 45Q, will workers employed to construct, alter, or repair the project's main line pipelines be paid prevailing wages? If not, please provide the basis for why the Applicant believes main line pipelines are excluded from 45Q requirements.
- d. With respect to the project qualifying for \$85/per ton of CO₂ captured and sequestered under 45Q, will workers employed to construct, alter, or repair the project's main line pipelines be covered by the apprenticeship requirements? If not, please provide the basis for why the Applicant believes main line pipelines are excluded from 45Q requirements.
- e. With respect to the project qualifying for \$85/per ton of CO₂ captured and sequestered under 45Q, will workers employed to construct, alter, or repair the project's trunk line pipelines be paid prevailing wages? If not, please provide the basis for why the Applicant believes trunk line pipelines are excluded from 45Q requirements.

- f. With respect to the project qualifying for \$85/per ton of CO2 captured and sequestered under 45Q, will workers employed to construct, alter, or repair the project's trunk line pipelines be covered by the apprenticeship requirements? If not, please provide the basis for why the Applicant believes trunk line pipelines are excluded from 45Q requirements.
- g. With respect to the project qualifying for \$85/per ton of CO2 captured and sequestered under 45Q, will workers employed to construct, alter, or repair the project's pump stations be paid prevailing wages? If not, please provide the basis for why the Applicant believes pump stations are excluded from 45Q requirements.
- h. With respect to the project qualifying for \$85/per ton of CO2 captured and sequestered under 45Q, will workers employed to construct, alter, or repair the project's pump stations be covered by the apprenticeship requirements? If not, please provide the basis for why the Applicant believes pump stations are excluded from 45Q requirements.
- i. With respect to the project qualifying for \$85/per ton of CO2 captured and sequestered under 45Q, will workers employed to construct, alter, or repair the project's capture facilities be paid prevailing wages? If not, please provide the basis for why the Applicant believes capture facilities are excluded from 45Q requirements.
- j. With respect to the project qualifying for \$85/per ton of CO2 captured and sequestered under 45Q, will workers employed to construct, alter, or repair the project's capture facilities be covered by the apprenticeship requirements? If not, please provide the basis for why the Applicant believes capture facilities are excluded from 45Q requirements.
- k. With respect to the project qualifying for \$85/per ton of CO2 captured and sequestered under 45Q, please provide a list of the facilities the Applicant will require be built subject to prevailing wage and apprenticeship requirements.
- l. With respect to the project qualifying for \$85/per ton of CO2 captured and sequestered under 45Q, and the applicable prevailing wage and apprenticeship requirements, how will Summit enforce these requirements with project construction contractors?

Response: SCS objects to this to this Interrogatory because it calls for irrelevant information and is not reasonably calculated to lead to admissible discovery. SCS also objects as it seeks the disclosure of proprietary or confidential business information or information subject to trade-secret protections. SCS also objects to this Interrogatory because it is vague, ambiguous, and unduly burdensome by seeking information related to third party entities that are not parties to this docket. This Interrogatory would thus require SCS to create or provide information not maintained in the ordinary course of its business.

INTERROGATORY NO. 12: Please refer to SCS Carbon Solutions, LLC's Responses to Interrogatories, Second Set, of the Great Plains Laborers' District Council Interrogatory No. 7b.

- a. Please provide a list of completed pipeline projects by Pumpco in North Dakota

- and Wyoming.
- b. Has Pumpco installed any carbon dioxide pipelines? If yes, please provide a list of completed carbon dioxide pipelines.**
 - c. With respect to Pumpco's experience installing pipelines, please list any completed projects by Pumpco where a spill of drilling fluid occurred during construction.**
 - d. With respect to Pumpco's experience installing pipelines, please list any completed projects by Pumpco where an explosion occurred during construction.**
 - e. With respect to Pumpco's experience installing pipelines, please list any completed projects by Pumpco where construction workers were hospitalized or killed.**

Response: SCS objects to this Interrogatory because it is vague, ambiguous, and unduly burdensome by seeking information related to third party entities that are not parties to this docket. This Interrogatory would thus require SCS to create or provide information not maintained in the ordinary course of its business. SCS also objects as it seeks the disclosure of proprietary or confidential business information or information subject to trade-secret protections.

INTERROGATORY NO. 13: Please refer to SCS Carbon Solutions, LLC's Responses to Interrogatories, Second Set, of the Great Plains Laborers' District Council Interrogatory No. 7.

- 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 pipelines in South Dakota, and the most recent pipeline projects completed by construction contractor in the state.**

Response: SCS objects as it seeks the disclosure of proprietary or confidential business information or information subject to trade-secret protections.

Dated May 5, 2023.

/s/ James Powell
James Powell

/s/ Erik Schovanec
Erik Schovanec

/s/ Jeff Cather
Jeff Cather

