

BEFORE THE PUBLIC UTILITIES COMMISSION OF
THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE APPLICATION OF SCS CARBON TRANSPORT, LLC FOR A PERMIT TO CONSTRUCT A
CARBON DIOXIDE TRANSMISSION PIPELINE

SD PUC DOCKET HP22-001

PRE-FILED DIRECT TESTIMONY OF BERT SCHUTZA

ON BEHALF OF WEB WATER DEVELOPMENT ASSOCIATION, INC.

June 16, 2023

1 **Q. What is your name?**

2 A. Bert Schutza

3 **Q. Provide your resume.**

4 A. Attached.

5 **Q. Provide your experience.**

6 A. Attached is my resume. I have more water experience not listed designing CP test stations for
7 monitoring interference, casing isolation, and cathodic protection test stations for CDM Smith, SJ
8 Louis of Texas, and others.

9 **Q. On whose behalf are you testifying?**

10 A. WEB Water Development Association, Inc. ("WEB")

11 **Q. Have you testified before?**

12 A. Yes, for Tanknology Inc., on an internal corrosion underground storage tank inspection, via
13 video testimony, Austin, Texas

14 **Q. What is the purpose of the testimony?**

15 A. To ensure that adequate cathodic protection is included in the construction requirements to
16 protect both Summit's pipeline and WEB's Mainline

17 **Q. Did you prepare the testimony?**

18 A. Yes

19 **Summarized testimony:**

20 **Q. What is WEB's cathodic protection proposal.**

21 A. At the proposed pipeline crossings, with Summit's pipeline, design and install interference
22 cathodic protection test stations (ICPTS) by certified cathodic protection specialist with experience
23 in pipeline corrosion control, to monitor and mitigate any potential stray current corrosion from

24 Summit's pipeline cathodic protection systems. The monitoring is typically coordinated with
25 Summit's corrosion control engineer by interrupting Summit's impressed current rectifiers and
26 observing effects on WEB's pipeline to design stray current mitigation systems as necessary at the
27 pipeline crossings.

28 **Q. Provide an overview of how Summit's pipeline could affect WEB's ability to serve and**
29 **grow its service area.**

30 A. Summit's CO₂ pipeline ("CO₂ Pipeline") cuts through the heart of WEB's System. The CO₂
31 pipeline will cross WEB Waterlines in 72 places ("Waterline Crossings") and its Mainline in 5
32 places ("Mainline Crossings"). This is the greatest number of crossings of any South Dakota rural
33 water system. Summit's standard easement requires landowners to obtain Summit's written
34 permission granting an easement including waterline easements. This requirement gives Summit
35 the power to block WEB's expansion by denying a landowner's request to grant WEB an easement.

36 **Q. Provide an overview of how Summit's pipeline could affect WEB's Mainline without**
37 **adequate cathodic protection.**

38 A. Summit's cathodic protection systems could cause stray current corrosion on WEB's main
39 pipeline at crossings thereby depressing WEB cathodic protection levels on WEB's large diameter
40 water main. CP current always takes the least resistive electrical paths in the earth to the pipeline
41 under cathodic protection. A foreign line at crossings can be that path and where the CP current
42 leaves the foreign line to travel to the Summit's pipeline it is often at the pipeline crossings. Where
43 CP current leaves the WEB main at the crossing, the potential for stray current corrosion is often
44 severe and accelerated to an eventual pipeline corrosion failure (if not understood and mitigated
45 for). Stray current mitigation systems are not difficult or expensive to install in the overall

46 operation of the pipeline but can be often overlooked until a pipeline corrosion failure occurs,
47 which is then too late and expensive pipeline repairs and/or replacement become necessary.

48 **Q. Provide an overview of how Summit's pipeline could affect WEB's Mainline without**
49 **adequate cathodic protection.**

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58 operation of the pipeline but can be often overlooked until a pipeline corrosion failure occurs,
59 which is then too late and expensive pipeline repairs and/or replacement become necessary.

60 **Q. Provide Summit's current cathodic protection plan**

61 **A.** Unknown

62 **Q. What are the specific concerns regarding cathodic protection at the Mainline crossings?**

63 **A.** Stray current corrosion on WEB's water main at crossing from Summit's pipeline operations.

64 **Q. Does this conclude your testimony?**

65 **A.** Yes