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

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

HP22-001

**NEIL HAMILTON'S
INITIAL PRE-FILED TESTIMONY
IN SUPPORT OF
LANDOWNER INTERVENORS**

Q: Please state your name and purpose for providing testimony in these proceedings.

A: My name is Neil Hamilton. The purpose of my testimony is to provide the PUC information helpful when considering Summit's claims of economic impacts. I have researched prior claims by other similarly situated companies and there is a history of the claims being different from reality. While the promoters of these projects tend to argue that any incremental economic "benefit" in terms of one new tax dollar or one new, albeit typically temporary, job is enough to be entitled to approval, I encourage thoughtful analysis around the net impacts looking project wide and consider the negative economic effects as well.

Q: What experience, education, training, or background qualify you to provide opinions and your concerns as you have hearing?

A: I am a former Director of the Drake University School of Law Agricultural Center and a Professor Emeritus of Law. I was the past President of the American Agricultural Law Association and Past Chair of the Agriculture Law Section of the Association of American Law Schools. I have published multiple works on agriculture, environmental law and policy.

Q: Does Attachment No. 1 to this testimony describe your opinions and concerns that you want the PUC to be aware of relative to the proposed CO2 pipeline in question?

A: Yes, that is a true and accurate copy of an article I co-authored discussing the reality CO2 pipelines based historical research. I stand by my positions and opinions discussed therein and am competent to testify about them as necessary. I urge the PUC to carefully consider this testimony during the Hearing in this matter and in your deliberations. I further reserve the right to amend or modify these opinions upon presentation of any additional information that may justify such a change.

Q: Are all of your opinions provided based upon your education, training, experience, and background and given to a reasonable degree of professional certainty?

A: Yes.

Dated June 15, 2023

/s/ Neil Hamilton

Neil Hamilton