

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

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HP 22-002

IN THE MATTER OF THE APPLICATION :
OF NAVIGATOR HEARTLAND :
GREENWAY, LLC FOR A PERMIT UNDER :
THE SOUTH DAKOTA ENERGY :
CONVERSION AND TRANSMISSION :
FACILITIES ACT TO CONSTRUCT THE :
HEARTLAND GREENWAY PIPELINE IN :
SOUTH DAKOTA, :
:

**APPLICANT’S FOURTH
SUPPLEMENTAL RESPONSES
TO STAFF’S FIRST SET
OF DATA REQUESTS**

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Applicant Navigator Heartland Greenway LLC makes the following supplemental responses to Staff’s First Set of Data Requests pursuant to SDCL § 15-6-33, and SDCL § 15-6-34(a). These responses are made within the scope of SDCL § 15-6-26(e) and shall not be deemed continuing nor be supplemented except as required by that rule. Applicant objects to definitions and directions in answering the requests to the extent that such definitions and directions deviate from the South Dakota Rules of Civil Procedure.

1-38) Referring to Section 7.11 of the Application, please provide a copy of the market study completed by Navigator that shows property values in rural areas are not usually affected by a pipeline.

RESPONSE: Objection. This request seeks information that is confidential and proprietary. Without waiving the objection, Navigator's market study will be provided subject to entry of an appropriate protective order by the PUC.

SUPPLEMENTAL RESPONSE: Attached are published studies addressing the effect of pipelines on property valuation: Natural Gas Pipeline Impact Study, the INGAA Foundation (2001); Eric Fruits, The Impact of the Presence of a Natural Gas Pipeline on Residential Property Values (2008); Pipeline Impact to Property Value and Property Insurability, the INGAA Foundation (2016); William N. Kinnard, Jr., et al., Natural Gas Pipeline Impact on Residential Property Values: An Empirical Study of Two Market Areas (1994); Randy L. Seale, et al., Pipeline Proximity: The Truth About the Impact on Value, Right of Way (May/June 2015); and Barry A. Diskin, et al., The Effect of Natural Gas Pipelines on Residential Value, Right of Way (January/February 2011).

Dated this 18th day of June, 2023.

WOODS, FULLER, SHULTZ & SMITH P.C.

By /s/James E. Moore
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OBJECTIONS

The objections stated to Staff's First Set of Data Requests were made by James E. Moore, one of the attorneys for Navigator Heartland Greenway, for the reasons and upon the grounds stated therein.

/s/ James E. Moore
*One of the Attorneys for Navigator Heartland
Greenway*

CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of July, 2023, a true and correct copy of the foregoing Applicant's Fourth Supplemental Responses to Staff's First Set of Data Requests was served via e-mail transmission to the following:

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/s/ James E. Moore

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