

Gevo Net-Zero 1, LLC
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April 21, 2025

South Dakota Public Utilities Commission
Capitol Building, 1st floor
500 E. Capitol Ave.
Pierre, SD 57501

Re: In the Matter of the Application by SCS Carbon Transport LLC for a Permit to Construct a Carbon Dioxide Transmission Pipeline – HP24-001

Dear Commissioners:

Gevo Net-Zero 1, LLC (“Gevo”), a wholly owned subsidiary of Gevo, Inc., submits this statement in support of the application by SCS Carbon Transport LLC (“SCS Carbon Transport”) to extend the deadline beyond April 22, 2025, for submitting a plan regarding the next steps of the SCS Carbon Transport’s proposed CO₂ pipeline project in South Dakota.

Gevo strongly supports the CO₂ transportation and sequestration infrastructure proposed by SCS Carbon Transport and affirms that a reasonable extension is critical not only for the feasibility and equity/debt financing of the alcohol-to-jet project in Lake Preston (the “ATJ 60 Project”), but also for advancing South Dakota’s leadership in biofuels, agricultural innovation, and national energy security.

1. Synthetic Aviation Fuel

The ATJ-60 Project is designed to produce synthetic aviation fuel (SAF) at scale using South Dakota corn as its primary feedstock. The facility’s ability to capture, transport and sequester CO₂ turns a potential cost center into a revenue generating, monetizable asset.

The ability to permanently sequester CO₂ unlocks access for Gevo to a growing set of market-based incentives, performance-based contracts, and buyer premiums.

Without access to the CO₂ pipeline infrastructure proposed by SCS Carbon Transport, Gevo will be unable to compete with a growing segment of domestic and international aviation fuel buyers that embed market-based incentives and targets in the procurement policies and financial risk management. The ATJ-60 Project must meet these consumer demands on a cost-effective basis to remain economically viable.

2. America's Agricultural and Energy Renaissance

The ATJ-60 Project is a cornerstone of efforts to produce domestically sourced, synthetic jet fuel. South Dakota's abundant corn production, agricultural expertise, and proximity to national rail and pipeline infrastructure make it uniquely suited to serve as a leader in this sector.

By transforming locally grown corn into advanced aviation fuel, Gevo is helping to strengthen America's energy resilience while creating durable rural jobs and value-added opportunities for South Dakota farmers. The pipeline extension sought by SCS Carbon Transport is a necessary enabler of this broader national and regional goal.

3. American Jobs and Exports

The ATJ-60 Project will create permanent, highly skilled jobs in Lake Preston, South Dakota. The ATJ-60 Project will employ 90+ full-time persons with average annual wages of \$102,000, and annual payroll of more than \$8,000,000. Overall, it is expected to create an additional 355 full-time regional jobs.

The construction of the ATJ-60 Project will generate significant labor demand for South Dakota's workers as it is expected to support approximately 1,100 construction jobs over three years.

The ATJ-60 Project will have a positive regional economic impact estimated to be greater than \$250 million annually and more than \$5 billion over the project's life.

Gevo's ability to economically capture, transport, and sequester CO₂ via the SCS Carbon Transport pipeline will enable South Dakota to export synthetic aviation fuel to international markets, which will tax, tariff, or otherwise penalize synthetic aviation fuel without CO₂ capture and sequestration.

4. CO₂ Pipeline Transport Is Proven and Safe

CO₂ is a non-flammable, non-toxic gas that is already safely transported across the United States via an existing network of pipeline. The physics, materials, and operational protocols associated with CO₂ transportation are well understood and subject to rigorous federal and state oversight.

Unlike natural gas, propane, or refined petroleum products, CO₂ presents minimal combustion or public safety risk. With modern engineering standards, automated monitoring, and emergency response protocols in place, the CO₂ transportation system proposed by SCS Carbon Transport poses negligible safety concerns.

5. Conclusion

The ATJ-60 Project stands as a transformative investment in South Dakota's energy future, rural economy, and national energy strategy. The extension sought by SCS Carbon Transport is not a delay in progress — it is a necessary adjustment that enables the continued advancement of a project ecosystem that delivers real, measurable benefits to the state and the country.

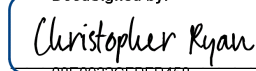
Given the South Dakota Legislature's recent enactment of HB1052, it is prudent to give SCS Carbon Transport a reasonable timeline to react to the impact of the legislation. The additional time will enable SCS Carbon Transport and the South Dakota Public Utilities Commission to benefit from a robust review of the new routing realities and determine the best course of action. Given HB1052, thirty days to review and assess is not reasonable and additional time is needed to fully understand the consequences to the pipeline project.

Any decisions will have a significant impact on South Dakota agriculture, ethanol production, and the viability of Gevo's ATJ-60 Project.

For the reasons set forth above, Gevo respectfully requests the South Dakota Public Utilities Commission to grant SCS Carbon Transport LLC adequate time in this pending matter.

Respectfully submitted,

Gevo Net-Zero 1, LLC

DocuSigned by:

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Christopher Ryan
President