

Print or Type

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

PRINT

This form is only for persons who wish to be an active party in this docket. You do NOT need to be a party to submit comments.

In the Matter of the Application by SCS Carbon)
Transport LLC for a Permit to Construct a Carbon)
Dioxide Transmission Pipeline)

APPLICATION FOR PARTY STATUS

HP24-001

United Association ("UA") of Journeymen and Apprentices of the Plumbing and Pipe Fitting Industry of the U.S. and Canada, petitions the Public Utilities Commission to be granted party status in this proceeding.
(Name of Applicant. This will be the person or entity named as a party.)

Place a check mark next to each item below that applies to you, adding a mileage number where requested.

____ I am a person or organization that received official notification of the project via U.S. mail from the siting permit applicant.

____ I reside within ____ miles of the proposed project.

Residential address if different from your mailing address:

____ I own land within ____ miles of the proposed project.

Legal description: _____

____ I officially represent a municipal, city, township, county or other affected governmental agency within ____ miles of the proposed project.

Explain your interest in applying for party status below.

See attached Motion to Intervene

Deadline: This application must be filed with the Public Utilities Commission on or before 5:00 p.m. CT, Jan. 24, 2025. File this completed form electronically at puc.sd.gov/EFilingOptions.aspx

This section is to be completed by the person requesting party status. All fields are required.

Chad Gilbert

Applicant's Printed/Typed Name

Chad Gilbert
Signature of Applicant

01/22/2

Date Signed

United Association (see full name above)

Name of Applicant's Organization (if Applicable)

Three Park Place

Applicant's Address (PO Box/St/Ave/Road)

Annapolis, MD 21401

Applicant's Address (City, State, ZIP Code)

(605) 906-0000

Applicant's Phone Number or, if represented, Applicant's Attorney's Phone Number

bill.taylor@taylorlawsd.com john.taylor@taylorla

Applicant's E-mail Address* or, if represented, Applicant's Attorney's E-mail Address*

The section below is to be completed by the Applicant's attorney, if represented. All fields are required.

John Taylor; William Taylor

Attorney's Printed/Typed Name

William Taylor
Signature of Attorney

1.23.25

Date Signed

4820 E 57th Street, Sioux Falls, SD 57108

Attorney's Address (PO Box/St/Ave/Road)

Attorney's Address (City, State, ZIP Code)

*The Commission processes its dockets electronically for time and cost efficiencies. Communication on the docket will be done via email to parties to this docket. Failure to provide an email address may result in documents being served upon the county auditor rather than sent directly to the party, pursuant to SDCL 49-41B-17.1.

If your submitted form is incomplete, you risk not being granted party status.

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

In the Matter of the Application by)	
SCS Carbon Transport LLC for a)	Docket No. HP24-001
Permit to Construct a Carbon Dioxide)	
Transmission Pipeline)	

**Motion to Intervene of the United Association of Journeymen and Apprentices of the
Plumbing and Pipe Fitting Industry of the United States and Canada, AFL-CIO**

On November 19, 2024, SCS Carbon Transport, a limited liability company owned by Summit Carbon Solutions, LLC (“Applicant”) submitted an application to the South Dakota Public Utilities Commission (“Commission”) for a permit under the South Dakota Energy Conversion and Transmission Facilities Act to construct the SCS Midwest Carbon Express Pipeline—a carbon dioxide (CO₂) transmission pipeline—in South Dakota (the “Project”). Pursuant to the Notice of Application for Docket No. HP24-001 establishing a deadline for intervention of January 24, 2025, the United Association of Journeymen and Apprentices of the Plumbing and Pipe Fitting Industry of the United States and Canada, AFL-CIO (“United Association” or “UA”) respectfully moves to intervene in the above-captioned proceeding. For the reasons stated below, the Commission should grant this Motion to Intervene and confer party status on the United Association.

I. Communications

Communications should be directed as follows:

1. Chad Gilbert, Director of Pipeline and Gas Distribution
United Association of Journeymen and Apprentices of the Plumbing and
Pipe Fitting Industry of the United States and Canada, AFL-CIO
Three Park Place
Annapolis, MD 21401
Phone: 410-269-2000
Email: cgilbert@uanet.org

2. William Taylor
John Taylor
Taylor Law Firm
4820 E 57th Street, Suite B
Sioux Falls, SD 57108
Phone: (605) 906-0000

II. Basis for Intervention

The United Association is a labor organization representing approximately 384,000 members in the United States and Canada who perform work in all facets of the plumbing and pipe fitting industry, including the construction of transmission pipelines. United Association members have worked on construction of every major pipeline project in the United States for the last 75 years, or longer. The United Association's principal place of business is located at Three Park Place, Annapolis, Maryland 21401. One of the United Association's local union affiliates, Local 300, has an office located at 612 E. 4th Street, Sioux Falls, South Dakota 57103. Local 300 represents approximately 700 UA members.

According to the Application, the Project would involve construction of 698 miles of carbon dioxide pipeline in South Dakota as well as six (6) pump stations over approximately a one- to two-year construction period.¹ The Applicant estimates that the Project would require an initial capital investment of approximately \$1.35 billion for the South Dakota portion alone.² During construction, the Applicant expects the Project to create 1,086 jobs, 854 through Applicant's contractors and suppliers, and 232 through induced impact, with labor income totaling \$475.7 million.³ The Applicant has executed a Memorandum of Understanding ("MOU") committing to construct the Project pursuant to a Project Labor Agreement ("PLA") negotiated

¹ *Application to South Dakota Public Utilities Commission for a Permit for the SCS Carbon Transport LLC Pipeline Under the Energy Conversion and Transmission Facility Act*, Summit Carbon Solutions, at §§ 1.2 & 1.4 (November 19, 2024) (*hereinafter* "SCS Application").

² *Id.* at § 1.3.

³ *Id.* at § 6.1.2

between the Pipe Line Contractors Association, which represents companies in the U.S. pipeline construction industry, and the unions that represent skilled pipeline tradespeople, including the UA, the Laborers' International Union of North America, the International Union of Operating Engineers, and the International Brotherhood of Teamsters. Consequently, the UA expects that it will be the union representative for hundreds of the workers who will construct the Project.

In addition, prior to construction, the UA will review the Applicant's welding procedure specifications ("WPS") for the Project, which specify the exact welding tools, techniques and procedures that will be used to construct the Project. Representatives of the UA will test the WPS to determine whether they are qualified under standards adopted by the U.S. Department of Transportation's Pipeline and Hazardous Materials Safety Administration ("PHMSA"). In the bigger picture, the United Association also advocates for and offers insight on responsible and safe energy infrastructure development, based on its immense experience and expertise in the field and that of the workers it represents.

III. Conclusion

For these reasons, the United Association submits that it has a direct interest in the outcome of this case, as required by SDCL 49-41B-17(4). The United Association's interests cannot be represented adequately by any other party in this proceeding because no other entity represents United Association workers. These interests are not shared by the public or taxpayers at-large. Finally, the United Association submits that its participation in this proceeding would serve the public interest, as the United Association would be able to provide the Commission with an on-the-ground perspective and helpful information about the specifics of Project construction, methods, and technologies.

Accordingly, the United Association respectfully moves to intervene pursuant to SDCL 49-41B-17 and ARSD 20:10:22:40.

Dated: January 24, 2025

Respectfully submitted,

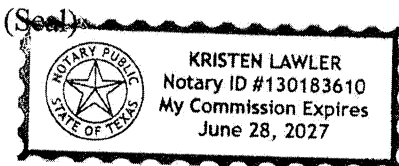
W. Chad Gilbert

Chad Gilbert, Director of Pipeline and Gas
Distribution
United Association of Journeymen and Apprentices
of the Plumbing and Pipe Fitting Industry of the
United States and Canada, AFL-CIO
Three Park Place
Annapolis, MD 21401
Phone: 410-269-2000
Email: cgilbert@uanet.org

State of Texas

County of Denton

Subscribed and sworn to (or affirmed) before me on this 23rd
day of January, 2025, by W. Chad Gilbert
proved to me on the basis of satisfactory evidence to be the
person(s) who appeared before me.



Signature Kristen Lawler