

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

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

**SD PUC DOCKET NO. HP24-001**

PRE-FILED SUPPLEMENTAL TESTIMONY OF JON PROBST  
ON BEHALF OF SCS CARBON TRANSPORT LLC

January 31, 2025

1 **Q. Mr. Probst, have you previously offered written testimony in this proceeding?**

2 A. Yes, I have.

3 **Q. What is the purpose of your supplement testimony today?**

4 A. Specifically, I will be addressing certain topics that arose during the public input  
5 meetings the PUC held from January 15 through January 17 regarding the Project.

6 **Q. What is your role with respect to the Project?**

7 A. I serve as Chief Commercial Officer and oversee all commercial activity for the company,  
8 which includes managing relationships with our ethanol producer partners, business  
9 development related to CO<sub>2</sub> utilization opportunities, and monetization of the various tax credit  
10 and carbon credits that the Project will generate.

11 **Q. There was a question at the public information meetings regarding the Project  
12 using multiple legal entities. Can you provide us with more information regarding what  
13 entity is applying for the permit?**

14 A. SCS Carbon Transport, LLC is the entity that is applying for the permit. SCS Carbon  
15 Transport, LLC will construct, own, and operate the pipeline.

16 **Q. How much corn is produced in South Dakota and what percentage of that corn is  
17 purchased by South Dakota ethanol plants?**

18 A. According to the US Department of Agriculture, 857 million bushels of corn were  
19 produced in South Dakota in 2024, and South Dakota ethanol producers purchased  
20 approximately half of that amount.

21 **Q. How much ethanol is produced by South Dakota ethanol plants and what  
22 percentage of that is exported?**

23 A. South Dakota produces approximately 1.3 billion gallons of ethanol annually. Only 50  
24 million gallons of that ethanol is consumed in-state each year, which means approximately 96%  
25 is exported to markets outside of South Dakota.

26 **Q. How does this pipeline help the Project's South Dakota ethanol plant customers?**

27 A. As demonstrated by the statistics in the previous questions and in the Application, the  
28 Midwest Carbon Express pipeline offers South Dakota ethanol producers a means of  
29 significantly reducing their carbon intensity score by sequestering a plant's carbon dioxide

30 emissions. This allows the 96% of South Dakota's ethanol that is exported outside the state to  
31 be marketed in locations that have or plan to impose low carbon fuel standards. Without a  
32 means to reduce a plant's carbon intensity score, South Dakota ethanol will be not be  
33 competitive in those markets, putting South Dakota ethanol producers at a permanent economic  
34 disadvantage.

35 **Q. Does this conclude your supplemental testimony?**

36 A. Yes.

37 Dated this 31 day of January, 2025.

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40           /s/ Jon Probst

41 Jon Probst

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