# SOUTH DAKOTA PUBLIC UTILITIES COMMISSION CASE NO. EL05-022

# IN THE MATTER OF THE APPLICATION BY OTTER TAIL POWER COMPANY ON BEHALF OF THE BIG STONE II CO-OWNERS FOR AN ENERGY CONVERSION FACILITY SITING PERMIT FOR THE CONSTRUCTION OF THE BIG STONE II PROJECT

#### PREFILED REBUTTAL TESTIMONY

OF

RICHARD R. LANCASTER

VICE PRESIDENT, GENERATION

**GREAT RIVER ENERGY** 

JUNE 9, 2006



# PREFILED REBUTTAL TESTIMONY OF RICHARD R. LANCASTER

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## 1 BEFORE THE SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

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- 3 I. INTRODUCTION
- 4 Q: Please state your name and business address.
- 5 A: Richard R. Lancaster, 17845 East Highway 10, Elk River, Minnesota, 55330-0800
- 6 Q: By whom are you employed and in what capacity?
- 7 A: Vice President, Generation, Great River Energy.
- 8 Q: Did you provide direct testimony in this proceeding?
- 9 A: Yes, My direct testimony has been marked as Applicants' Exhibit 2.
- 10 Q: In rebuttal, to whose direct testimony are you responding?
- 11 A: I am responding primarily to the direct testimony of Olesya Denney offered by the staff
- 12 of the South Dakota Public Utilities Commission.
- 13 II. DR. DENNEY TESTIMONY
- 14 Q: Dr. Denney testified that GRE's forecast is inaccurate because of the manner in
- which DSM impacts are included in its forecast. Do you agree?
- 16 A: No. GRE is confident that the 2004 Long-Range Load Forecast (LRLF) is accurate. The
- 17 2004 LRLF used the best available methodology for forecasting future growth of consumers. It
- 18 is the growth of households that underlies GRE's forecast of growth and need for additional
- resources, including its share of the proposed Big Stone Unit II.
- 20 Q: Dr. Denney testified, p. 52, lines 16-8, that "the utilities participating in the Big
- 21 Stone project can only recover the costs associated with the plant through appropriate
- 22 filings with their respective state commissions." Do you have any comment?

#### APPLICANTS' EXHIBIT 39

- 1 A: Great River Energy is a private cooperative, formed under the Minnesota cooperative
- 2 corporation statute and is owned by its distribution members, who are in turn owned by its
- 3 customer-members on a patronage basis. As a member-owned cooperative, our rates are set by
- 4 our board of directors, which is elected by our owner-members. The Minnesota Public Utilities
- 5 Commission is not involved in setting Great River Energy's rates, nor is any other public service
- 6 commission.
- 7 Q: Does this conclude your testimony?
- 8 A: Yes it does.

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