

DATE JUN 23 2006

# Minnesota Center for Environmental Advocacy

The legal and scientific voice protecting and defending Minnesota's environment

26 East Exchange Street - Suite 206  
Saint Paul, MN 55101-1667  
651.223.5969  
651.223.5967 fax  
mcca@mncenter.org  
www.mncenter.org

June 23, 2005

**Founding Director**  
Sigurd F. Olson  
(1899-1982)

**Board of Directors**  
Janice L. Goldman-Carter  
*Chair*  
Jim Perry  
*Vice Chair*  
Kent White  
*Treasurer*

Mary H. Binger

Kim Carlson

Gene Christenson

Charles K. Dayton

Robert G. Dunn

Jane C. Green

Cecily Hines

Vanya S. Hogen

Roger Holmes

Douglas A. Kelley

Michael Kleber-Diggs

Dee Long

Jim Perry

Steven G. Thorne

Martha C. Brand

*Executive Director*

Patty Van Gerpen  
Executive Director  
South Dakota Public Utilities Commission  
500 East Capitol Avenue  
Pierre, SD 58501

Re: **In the Matter of the Application by Otter Tail Power Company on  
Behalf of Big Stone II Co-owners for an Energy Conversion Facility  
Permit for the Construction of Big Stone II Project  
Docket No. EL05-022**

Dear Ms. Van Gerpen:

Enclosed for filing please find an original and six copies of a corrected page 17 of the Direct Testimony of David A. Schlissel and Anna Sommer dated May 26, 2006, submitted on behalf of Joint Intervenors. The corrections do not affect any other text or conclusions provided in the original testimony.

We apologize for any inconvenience. We will serve a complete corrected testimony by e-mail to those on the e-mail service list.

If you have any questions, please contact me at 651-223-5969.

Sincerely,

Elizabeth I. Goodpaster

Enclosure

PUBLIC VERSION  
 PROTECTED INFORMATION REDACTED

1  
 2

**Table 1 Levelized Cost Comparison Coal vs. Wind-Gas Combination –  
 for Investor Owned Utilities**

Resource Option	Low CO <sub>2</sub>	Mid CO <sub>2</sub>	High CO <sub>2</sub>
Coal 600 MW	\$65.80	\$80.95	\$96.66
Wind 800 MW + CCGT - No PTC			
Alternative One - 800 MW wind + 480 MW CCGT	\$68.53	\$71.22	\$73.98
Alternative Two - 800 MW wind + 400 MW CCGT	\$67.32	\$69.82	\$72.57
Wind 800 MW + CCGT with PTC			
Alternative One - 800 MW wind + 480 MW CCGT	\$61.26	\$63.95	\$66.70
Alternative Two - 800 MW wind + 400 MW CCGT	\$60.05	\$62.55	\$65.30
Wind 1200 MW + CCGT - No PTC			
Alternative Three - 1200 MW wind + 420 MW CCGT	\$59.68	\$60.32	\$60.95
Alternative Four - 1200 MW wind + 300 MW CCGT	\$57.58	\$58.21	\$58.85
Wind 1200 MW + CCGT & PTC with PTC			
Alternative Three - 1200 MW wind + 420 MW CCGT	\$48.77	\$49.41	\$50.04
Alternative Four - 1200 MW wind + 300 MW CCGT	\$46.67	\$47.30	\$47.94

3

*The Low CO<sub>2</sub>, Mid CO<sub>2</sub> and High CO<sub>2</sub> figures reflect the Synapse carbon price forecasts presented in Exhibit JI-1-F to our May 19, 2006 testimony.*

4  
 5

6  
 7

**Table 2 Levelized Cost Comparison Coal vs. Wind-Gas Combination –  
 for Public Power Utilities**

Resource Option	Low CO <sub>2</sub>	Mid CO <sub>2</sub>	High CO <sub>2</sub>
Coal 600 MW	\$57.37	\$74.30	\$91.22
Wind 800 MW + CCGT - No PTC			
Alternative One - 800 MW wind + 480 MW CCGT	\$67.19	\$70.16	\$73.12
Alternative Two - 800 MW wind + 400 MW CCGT	\$66.16	\$69.13	\$72.10
Wind 800 MW + CCGT with PTC			
Alternative One - 800 MW wind + 480 MW CCGT	\$59.91	\$62.88	\$65.85
Alternative Two - 800 MW wind + 400 MW CCGT	\$58.89	\$61.86	\$64.82
Wind 1200 MW + CCGT - No PTC			
Alternative Three - 1200 MW wind + 420 MW CCGT	\$57.87	\$58.55	\$59.24
Alternative Four - 1200 MW wind + 300 MW CCGT	\$56.32	\$57.01	\$57.69
Wind 1200 MW + CCGT & PTC with PTC			
Alternative Three - 1200 MW wind + 420 MW CCGT	\$46.96	\$47.64	\$48.33
Alternative Four - 1200 MW wind + 300 MW CCGT	\$45.41	\$46.10	\$46.78

8

9

The results in these Tables show the following:

10  
 11

- Under our Mid CO<sub>2</sub> price forecast, which we believe is the most likely, and our High CO<sub>2</sub> price forecast, all of the wind and CCGT alternatives

STATE OF SOUTH DAKOTA  
BEFORE THE PUBLIC UTILITIES COMMISSION

---

In the Matter of the Application by Otter  
Tail Power Company on Behalf of Big  
Stone II Co-owners for an Energy Conversion  
Facility Permit for the Construction of Big  
Stone II Project

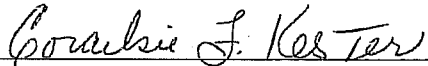
**AFFIDAVIT OF SERVICE**

Docket No. EL-05-022


---

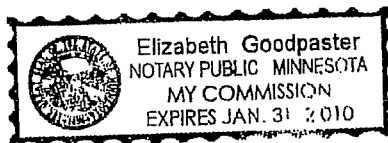
Coraelsie F. Kester, being duly sworn, says that on the 23<sup>rd</sup> of June, 2006, she delivered via U.S. Mail a corrected page 17 of the Direct Testimony of David A. Schlissel and Anna Sommer dated May 26, 2006 (public version) to Attorneys Thomas J. Welk, Joanne M. Haase and Christopher W. Madsen, counsel for Big Stone II Co-owners, in this action, by mailing to them a copy thereof, enclosed in an envelope, postage prepaid, and by depositing the same in the post office at St. Paul, Minnesota, directed to said persons at PO Box 5015, Sioux Falls, SD 57117-5015. She also served by U.S. Mail said document to those parties on the attached legal service list.

She also served the complete corrected Direct Testimony of David A. Schlissel and Anna Sommer dated May 26, 2006 (public version) to said counsel and all parties on the attached e-mail service list

  
Coraelsie F. Kester

Subscribed and sworn to before me  
this 23<sup>rd</sup> day of June, 2006.

  
Notary Public



\*DOCKET EL05-022\*

\*E-SERVICE LIST\*

Patty Van Gerpen  
Executive Director  
Public Utilities Commission  
500 East Capitol  
Pierre SD 57501  
patty.vangerpen@state.sd.us

John J. Smith  
Public Utilities Commission  
500 E. Capitol Ave.  
Pierre, SD 57105  
John.j.smith@state.sd.us

Karen Cremer  
Public Utilities Commission  
500 E. Capitol Ave.  
Pierre, SD 57105  
karen.cremer@state.sd.us

Thomas J. Welk  
Boyce Greenfield Pashby & Welk LLP  
PO Box 5015  
Sioux Falls, SD 57117-5015  
tjwelk@bgpw.com

Joanne M. Haase  
Boyce Greenfield Pashby & Welk LLP  
PO Box 5015  
Sioux Falls, SD 57117-5015  
jmhaase@bgpw.com

Christopher W. Madsen  
Boyce Greenfield Pashby & Welk LLP  
PO Box 5015  
Sioux Falls, SD 57117-5015  
cwmadsen@bgpw.com>

David L. Sasseville  
Lindquist & Vennum, P.L.L.P.  
80 South 8th Street  
4200 IDS Center  
Minneapolis, MN 55402-2274  
dsasseville@lindquist.com

Todd J. Guerrero  
Lindquist & Vennum, P.L.L.P.  
80 South 8th Street  
4200 IDS Center  
Minneapolis, MN 55402-2274  
tguerrero@lindquist.com

Bruce Gerhardson  
Associate General Counsel  
Otter Tail Corporation  
215 S. Cascade St.  
PO Box 496  
Fergus Falls, MN 56538-0496  
bgerhardson@ottertail.com

Mary Jo Stueve  
196 East 6th Street, No 401  
Sioux Falls, SD 57104  
mj\_stueve@hotmail.com>

John Davidson Jr.  
USD School of Law  
414 East Clark Street  
Vermillion, SD 57069  
jdavidso@usd.edu

Lesley J. Adam  
Johnson-Provo-Petersen, L.L.P.  
332 Minnesota Street  
First National Bank Building, Suite West 975  
St. Paul, MN 55101  
adam.lesley@johnsonpetersenlaw.com

Michael D. O'Neill  
Johnson-Provo-Petersen, L.L.P.  
332 Minnesota Street  
First National Bank Building, Suite West 975  
St. Paul, MN 55101  
oneill.michael@johnsonpetersenlaw.com

Casey Davidson  
Davidson Law Office  
524 West Main Street  
Vermillion SD 57069  
davidsonlaw@mchsi.com

Pat Gallagher  
Director of Environmental Law  
Sierra Club  
85 Second Street 2<sup>nd</sup> Floor  
San Francisco, CA 94105  
pat.gallagher@sierraclub.org

Bruce Nilles  
Sierra Club  
214 North Henry Street, Suite 203  
Madison, WI 53703  
bruce.nilles@sierraclub.org

George Hays  
Sierra Club  
236 West Portal Avenue, No. 110  
San Francisco, CA 94127  
georgehays@mindspring.com

Sanjay Narayan  
Sierra Club  
85 Second Street 2nd Floor  
San Francisco Ca 94105  
sanjay.narayan@sierraclub.org

## LEGAL SERVICE LIST

Patty Van Gerpen  
Executive Director  
Public Utilities Commission  
500 East Capitol  
Pierre, SD 57501

Karen Cremer  
Public Utilities Commission  
500 E. Capitol Ave.  
Pierre, SD 57105

Thomas J. Welk  
Christopher W. Madsen  
Joanne M. Haase  
Boyce Greenfield Pashby & Welk LLP  
PO Box 5015  
Sioux Falls, SD 57117-5015

Mary Jo Stueve  
196 East 6<sup>th</sup> Street, No. 401  
Sioux Falls, SD 57104

John Davidson, Jr.  
USD School of Law  
414 East Clark Street  
Vermillion, SD 57069

Casey Davidson  
Davidson Law Office  
524 West Main Street  
Vermillion, SD 57069