

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

**IN THE MATTER OF THE APPLICATION BY PREVAILING WIND PARK, LLC
FOR A PERMIT FOR A WIND ENERGY FACILITY IN BON HOMME, CHARLES MIX,
AND HUTCHINSON COUNTIES, SOUTH DAKOTA, FOR PREVAILING WIND
PARK ENERGY FACILITY**

SD PUC DOCKET EL 18-026

PRE-FILED DIRECT TESTIMONY OF JAMES DAMON
ON BEHALF OF PREVAILING WIND PARK, LLC

May 30, 2018

1 **I. INTRODUCTION AND QUALIFICATIONS**

2

3 **Q. Please state your name, employer, and business address.**

4 A. My name is James Damon. I am a Senior Project Manager at sPower Development
5 Company, LLC (“sPower”). My business address is 2180 South 1300 East, Suite
6 600, Salt Lake City, Utah.

7

8 **Q. Briefly describe your educational and professional background.**

9 A. I have a Bachelor of Arts in Urban Studies and Political Science, and a Master’s
10 Degree in City and Regional Planning.

11

12 I am a Senior Project Manager and manage a 500-megawatt (“MW”) development
13 portfolio at sPower. I am responsible for structuring and negotiating land
14 agreements, negotiating and managing engineering and procurement contracts,
15 performing technical due diligence for project acquisitions, managing project
16 budgets, and managing third-party consultants. I have over 10 years of experience
17 in renewable energy development.

18

19 A copy of my resume is attached as Exhibit 1.

20

21 **Q. Could you explain the relationship between Prevailing Wind Park, LLC**
22 **(“Prevailing Wind Park” or the “Applicant”) and sPower with respect to the**
23 **proposed Prevailing Wind Park Energy Facility (“Project”)?**

24 A. Prevailing Wind Park, a South Dakota limited liability company, is a wholly owned
25 subsidiary of sPower. Prevailing Wind Park will own and develop the Project.

26

27 **Q. Could you please describe sPower’s experience in the renewable energy**
28 **industry?**

29 A. sPower is the largest private owner of operating solar assets in the United
30 States. sPower owns and operates a portfolio of solar and wind assets greater than
31 1.3 gigawatts (“GW”) and has a development pipeline of more than 10 GW. sPower

32 is owned by a joint venture partnership between The AES Corporation (NYSE: AES),
33 a worldwide energy company headquartered in Arlington, Virginia, and the Alberta
34 Investment Management Corporation, one of Canada’s largest and most diversified
35 institutional investment fund managers.

36

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

38 A. I am the Project manager, and in that role, I oversee development of the Project.

39

40 **II. PURPOSE OF TESTIMONY**

41

42 **Q. What is the purpose of your Direct Testimony?**

43 A. The purpose of my testimony is to provide an overview of the Project’s development
44 history, including: Project site selection, site analysis, and layout and facility design.
45 I also provide testimony regarding Project operational considerations.

46

47 **Q. What exhibits are attached to your Direct Testimony?**

48 A. The following exhibits are attached to my Direct Testimony:

- 49 • Exhibit 1: Resume

50

51 **Q. Please identify the sections of the Application to the South Dakota Public**
52 **Utilities Commission for a Facility Permit (“Application”) that you are**
53 **sponsoring for the record.**

54 A. I am sponsoring the following portions of the Application:

- 55 • Section 1.0: Introduction
- 56 • Section 2.0: Project Development Summary
- 57 • Section 3.0: Facility Permit Application
- 58 • Section 4.0: Names of Participants
- 59 • Section 5.0: Name of Owner and Manager
- 60 • Section 6.0: Purpose of, and Demand for, the Wind Energy Facility
- 61 • Section 7.0: Estimated Cost of the Wind Energy Facility
- 62 • Section 9.0 Alternate Sites and Siting Criteria

- 63 • Section 15.6: Electromagnetic Interference
- 64 • Section 19.0: Time Schedule
- 65 • Section 20.0: Community Impact (with the exception of those subsections
- 66 concerning cultural resources)
- 67 • Section 21.0: Employment Estimates
- 68 • Section 23.0: Future Additions and Modifications
- 69 • Section 25.0: Reliability and Safety
- 70 • Section 26.0: Information Concerning Wind Energy Facilities
- 71 • Section 27.4: Applicants Burden of Proof
- 72 • Section 28.0: Testimony and Exhibits
- 73 • Section 29.0: References
- 74 • Appendix A: Figures
- 75 • Appendix O: RF Impact Report
- 76 • Appendix P: 2009 Berkeley Property Values Study
- 77 • Appendix Q: 2013 Berkeley Property Values Study

78

79 **III. PROJECT OVERVIEW**

80

81 **Q. Who will own and operate the Project?**

82 A. Prevailing Wind Park will own, manage, and operate the Project.

83

84 **Q. Please provide a basic description of the Project, including where it is located.**

85 A. The proposed Project is an up to 219.7-MW nameplate capacity wind energy facility
86 to be located within a 50,364-acre project area (“Project Area”) in Bon Homme,
87 Charles Mix, and Hutchinson counties, South Dakota. The Project will consist of the
88 following components:

- 89 • Up to 61 wind turbines;
- 90 • Access roads to wind turbines and associated facilities;
- 91 • An underground electrical power collector and communication system;
- 92 • A collector substation;
- 93 • Up to four permanent meteorological (“MET”) towers;

- 94 • An operations and maintenance (“O&M”) facility; and
95 • Additional temporary construction areas, including crane paths, public road
96 improvements, a laydown yard, and one or more concrete batch plants (as
97 needed).

98

99 **Q. Has Prevailing Wind Park secured all of the necessary private property rights**
100 **for the Project?**

101 A. Yes. Prevailing Wind Park has secured all of the private land rights necessary to
102 construct the Project. Prevailing Wind Park will work with local units of government
103 to obtain the necessary road crossing and utility permits for the Project.

104

105 **Q. How and where will the Project interconnect to the electric grid?**

106 A. The Project will interconnect with Western Area Power Administration’s (“WAPA”) existing
107 Utica Junction Substation, located approximately 27 miles east of the
108 Project. The Applicant is proposing to construct a new 115-kilovolt (“kV”) gen-tie line
109 in Bon Homme and Yankton counties from the collector substation to the Utica
110 Junction Substation. The gen-tie line and step-up interconnection substation are not
111 under the jurisdiction of the South Dakota Public Utilities Commission
112 (“Commission”) and will be permitted in Bon Homme and Yankton counties.

113

114 **Q. Has the Project identified an off-taker for the energy it will produce?**

115 A. Yes. In January 2018, Prevailing Wind Park entered into a 30-year 200-MW power
116 purchase agreement (“PPA”) with a South Dakota load-serving entity.

117

118 **Q. What is the proposed development schedule for the Project?**

119 A. Prevailing Wind Park expects to commence construction activities in the Fourth
120 Quarter of 2018 and have the Project operational in the Fourth Quarter of 2019.
121 However, commencement of construction is dependent on the timing of
122 interconnection studies, required transmission upgrades, and securing Project
123 financing.

124

125 **IV. OVERVIEW OF SITE SELECTION**

126

127 **Q. Please provide an overview of the Project’s development history.**

128 A. A group of local investors formed Prevailing Winds, LLC in 2014, following the
129 successful development of the 80 MW B&H Wind Project (now Beethoven Wind
130 Project), to create additional sources of income for area landowners and economic
131 growth for the local communities through wind energy.

132

133 Prevailing Winds, LLC filed an application with the Commission in June 2016 for a
134 200-MW wind farm with up to 100 2.3-MW wind turbines. At that time, Prevailing
135 Winds, LLC did not have all private land rights secured for the Project and did not
136 have an off-taker for the energy that would be produced. Prevailing Winds, LLC
137 subsequently withdrew the application in August 2016.

138

139 In October 2017, sPower acquired the Prevailing Wind Park, LLC assets and
140 development rights to the Project from Prevailing Winds, LLC. sPower formed
141 Prevailing Wind Park, LLC which has undertaken extensive development activities,
142 acquired all necessary private land rights, and secured an off-taker for the Project’s
143 output.

144

145 **Q. How was the location of the Project initially identified?**

146 A. In 2015, Prevailing Winds, LLC conducted feasibility studies to identify a potential
147 wind project location along WAPA’s Fort Randal to Utica Junction to Sioux City
148 double-circuit 230-kV transmission line. Three separate site alternatives along the
149 line were studied, and a site in Bon Homme and Charles Mix counties was initially
150 selected. This site was selected due to the superior wind resource, lower population
151 density, and lower environmental risks, as compared to the alternative sites.
152 Following selection of the initial site and Prevailing Wind Park’s acquisition of the
153 Project, the Project boundary has been further refined over time based on the results
154 of community outreach, land acquisition, agency coordination, and completion of
155 additional studies. These refinements have included a shift of the Project boundary

156 to the north away from the Missouri River. In addition to acreage in Bon Homme
157 and Charles Mix counties, the Project Area now includes acreage in Hutchinson
158 County.

159

160 **V. TURBINE MODEL SELECTION**

161

162 **Q. Has Prevailing Wind Park made a final turbine model selection for the Project?**

163 A. No, not at this time. Prevailing Wind Park is considering turbines with an energy
164 production range between 3.6 MW and 3.8 MW, and the Application contains
165 information regarding two representative turbines, the General Electric (“GE”) 3.8-
166 137 and the Vestas V136-3.6 turbine models. The final decision regarding turbine
167 model will be made prior to construction.

168

169 **Q. Why is it important for the Project to have flexibility with respect to the turbine
170 model selected?**

171 A. Identifying one turbine option at this time would make it difficult for Prevailing Wind
172 Park to negotiate the best turbine price with suppliers. Turbine supply agreements
173 are not typically executed until after receipt of most major permits. This timing is
174 due, in part, to the large capital investment required in connection with wind turbine
175 acquisition. Additionally, flexibility in turbine model selection will provide for
176 optimization of Project design, as it will allow Prevailing Wind Park to consider
177 known conditions of the Project Area and all wind turbines commercially available at
178 the time of construction – turbine technology is continually evolving, so such
179 flexibility will allow the Project to take advantage of the latest technological
180 developments in wind turbines. For any wind project to remain competitive, it must
181 have the flexibility to use the latest turbine technology at the lowest costs.

182

183 **VI. PROJECT CONFIGURATION**

184

185 **Q. Is the Project’s proposed configuration depicted in Figure 2 of the
186 Application?**

187 A. Yes, Figure 2 to the Application shows the 63 turbine locations proposed for the
188 configuration of the Project. Please note that the turbine numbers go from 1-58 and
189 60-64; as the turbine location 59 was eliminated.

190

191 **Q. Is this same configuration proposed for any turbine model selected?**

192 A. Yes. The configuration shown in Figure 2 to the Application will be used for the
193 turbine model finally selected for the Project, whether the GE model, the Vestas
194 model, or another comparable turbine model is used. Depending on the turbine
195 model selected, a subset of the 63 proposed turbine locations will be used in order
196 to reach a total output of up to 200 MW. Although not all of the 63 proposed
197 locations will be used, acoustic and shadow flicker modeling was conducted at all 63
198 proposed turbine locations for both of the representative turbine models. If a
199 different turbine model is ultimately selected, Prevailing Wind Park will update its
200 acoustic and shadow flicker modeling.

201

202 **Q. Is the configuration sited so as to minimize potential environmental impacts?**

203 A. Yes. The Project's proposed configuration was sited to minimize potential
204 environmental impacts, as discussed in Sections 10.0 through 15.0 and 17.0 and
205 18.0 of the Application and in the Direct Testimony of Bridget Canty.

206

207 **Q. Is the Project configuration designed to comply with all applicable County and
208 State turbine setback requirements?**

209 A. Yes.

210

211 **Q. Please identify the applicable specific setbacks for the Project and other
212 requirements and commitments that affect turbine setbacks.**

213 A. The applicable setbacks, requirements and commitments are listed in the Table 9-2
214 in the Application and provided below.

215

216

217

Prevailing Wind Park Siting Requirements/Commitment

Category	Requirements/Commitments
State Requirements	
Setbacks	Turbines shall be set back at least 500 feet or 1.1 times the height of the tower, whichever is greater, from any surrounding property line (SDCL 43-13-24).
Bon Homme County Requirements^a	
Setbacks	<p>(a) Distance from currently occupied off-site residences, business and public buildings shall be not less than one thousand (1,000) feet. Distance from the residence of the landowner on whose property the tower(s) are erected shall be not less than five hundred (500) feet or one point one (1.1) times the system height, whichever is greater. For the purposes of this section only, the term “business” does not include agricultural uses.</p> <p>(b) Distance from right-of-way of public roads shall be not less than five hundred (500) feet or one point one (1.1) times the system height, whichever is greater.</p> <p>(c) Distance from any property line shall be not less than five hundred (500) feet or one point one (1.1) times the system height, whichever is greater, unless appropriate easement has been obtained from adjoining property owner.</p>
Noise	<p>Noise level produced by the LWES shall not exceed forty-five (45) dBA, average A-weighted sound pressure at inhabited dwelling existing at the time the permit application is filed, unless a signed waiver or easement is obtained from the owner of the dwelling.</p> <p>The permittees shall submit a report of predicted noise levels at habitable residential dwellings within one mile of proposed tower locations to the Board no less than forty-five (45) days prior to commencing construction.</p>
Voluntary Commitments in Charles Mix and Hutchinson Counties	
Setbacks	<p>(a) Distance from currently occupied off-site residences, business and public buildings will be not less than 1,000 feet. Distance from the residence of the landowner on whose property the tower(s) are erected will be not less than 500 feet or 1.1 times the system height, whichever is greater. The term “business” does not include agricultural uses.</p> <p>(b) Distance from right-of-way of public roads will be not less than 500 feet or 1.1 times the system height, whichever is greater.</p> <p>(c) Distance from any property line will be not less than 500 feet or 1.1 times the system height, whichever is greater, unless appropriate easement has been obtained from adjoining property owner.</p>
Noise	Noise level produced by the wind turbines will not exceed 45 dBA, average A-weighted sound pressure at currently inhabited dwellings, unless a signed waiver or easement is obtained from the owner of the dwelling.
Shadow Flicker Commitment	
Shadow Flicker	Shadow flicker produced by the wind turbines will not exceed 30 hours per year at currently inhabited dwellings of non-participants.
Bon Homme County, South Dakota, Zoning Ordinance (amended November 3, 2015)	

219 **Q. Your table notes a shadow flicker commitment for non-participating**
 220 **landowners. Please explain that commitment.**

221 A. Yes. With respect to shadow flicker, only Bon Homme County has a specific wind
222 energy system ordinance and the ordinance does not specify a standard for shadow
223 flicker. It indicates that the county may require the installation of a shadow flicker
224 control system under certain circumstances. In lieu of a specific standard, Prevailing
225 Wind Park commits to limit shadow flicker at non-participating residences in the
226 Project Area to no more than 30 hours per year. As described in Mr. Aaron
227 Anderson’s Direct Testimony, conservative shadow flicker modeling indicates a level
228 above 30 hours per year for one non-participating residence. Prevailing Wind Park
229 is undertaking updated analysis using more realistic modeling assumptions for that
230 residence and will update the predicted shadow flicker level with supplemental
231 testimony. If updated modeling results still show more than 30 hours per year of
232 shadow flicker, Prevailing Wind Park will work with the landowner to implement
233 mitigation techniques, such as screening or implement operational controls to
234 ensure experienced shadow flicker levels are below 30 hours per year.

235

236 **VII. FINAL MICRO-SITING**

237

238 **Q. Could the remaining cultural resource survey, and other surveys, wetland and**
239 **waterbody delineations, and geotechnical work require changes to the turbine**
240 **locations?**

241 A. Yes. As discussed further in the Direct Testimony of Bridget Canty, Prevailing Wind
242 Park must complete wetland and waterbody delineations, cultural resource surveys,
243 a rare plant habitat assessment, and geotechnical evaluations to finalize the micro-
244 siting of turbines. The wetland and waterbody delineations and rare plant habitat
245 assessment are in process. Additionally, Prevailing Wind Park is in the process of
246 field verifying areas of potential untilled grasslands that, based on the 2018 desktop
247 analysis, exhibit recent signs of disturbance or that were added to the Project Area
248 after the prior field verifications were completed.

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250 Minor shifts in the proposed turbine locations could be required due to the results of
251 the remaining survey work and the geotechnical evaluations.

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Q. What is Prevailing Wind Park’s request with respect to flexibility for future minor shifts in the turbine locations presented in Figure 2 of the Application?

A. Prevailing Wind Park requests that the permit allow turbines to be shifted within 500 feet of their currently proposed locations, so long as specified noise requirements, setbacks and the Applicant’s shadow flicker commitment are not exceeded, cultural resource impacts and habitats for listed species are avoided, and wetland impacts are avoided to the greatest extent practicable. If turbine shifts are greater than 500 feet, exceed the noted thresholds, or do not meet the other limitations specified, Prevailing Wind Park would either use an alternate turbine location or obtain Commission approval of the proposed turbine location change.

Q. Is the siting flexibility requested by Prevailing Wind Park consistent with the land use requirements of Bon Homme and Hutchinson counties?

Yes. It is our understanding that the approvals obtained from Bon Homme and Hutchinson counties will authorize the use of the land for a wind energy system and that the turbine locations can be adjusted so long as applicable setbacks and other requirements are met.

Q. With respect to other facilities, what is Prevailing Wind Park’s request with respect to final micro-siting?

A. As a result of final micrositing, shifts in the access roads and collector system, as well as changes in the locations of the O&M facility, met towers, Project substation, concrete batch plant, and laydown/staging areas, may be necessary. Therefore, Prevailing Wind Park requests that the permit allow those facilities to be modified, as needed, so long as the new locations are on land leased for the Project, cultural resources and habitats for listed species are avoided, wetland impacts are avoided to the greatest extent practicable, and all other applicable regulations and requirements are met.

Q. Are any future modifications or expansions of the Project planned?

283 A. No, other than potential minor shifts during Project micro-siting, no future
284 modification or expansions are planned.

285

286 **VIII. PROJECT OPERATION AND MAINTENANCE**

287

288 **Q. Discuss the personnel that will be involved in operation and maintenance of**
289 **the Project.**

290 A. The Project’s expected life span is approximately 30 years. During this time, a
291 maintenance crew will be on-site 24-hours a day, seven days a week to monitor
292 turbine operations from the O&M building and conduct maintenance activities, as
293 needed.

294

295 Overall, it is predicted that, during operation and maintenance, the Project will create
296 approximately 8 to 10 full-time jobs paying \$35,000 - \$80,000 per year. Up to six of
297 those positions will be for wind technician jobs paying \$60,000 to \$70,000 annually.

298

299 **Q. Discuss the inspections that will be conducted and when they will occur.**

300 A. All major components of the wind turbines will undergo routine maintenance
301 according to the schedules established by the component manufacturer.

302

303 **Q. How will the Project be monitored between inspections?**

304 A. All proposed turbine models have supervisory control and data acquisition
305 (“SCADA”) communication technology to control and monitor the Project. This
306 system permits automatic, independent operation and remote supervision, allowing
307 simultaneous on-site and off-site control of the wind turbines.

308

309 **Q. How reliable will the wind turbines and associated infrastructure be?**

310 A. Prevailing Wind Park requires availability guarantees from turbine manufacturers
311 and O&M service providers to maintain the turbine at 98 percent availability or
312 higher.

313

314 **IX. DESIGN, CONSTRUCTION, AND OPERATIONAL CONSIDERATIONS**

315

316 **Q. What safety features will be incorporated into the Project?**

317 A. Prevailing Wind Park has incorporated or will incorporate a number of safety and
318 security measures to protect persons and property, including, but not limited to:

- 319 • Wind turbine towers setback from residences and existing roadways in
320 accordance with or in excess of applicable regulations;
- 321 • Wind turbine locations will comply with applicable noise requirements;
- 322 • During construction and operation of the Project, temporary (safety) and
323 permanent fencing will be used to restrict access to the site;
- 324 • Warning signs will be in place and Project facilities (turbine tower doors, gates at
325 facilities, etc.) will be locked when not in use;
- 326 • Regular maintenance and inspections will be conducted; and
- 327 • A professional engineer would certify that the foundation and tower design of the
328 turbines is within accepted professional standards, given local soil and climate
329 conditions.

330

331 **Q. How has Prevailing Wind Park accounted for existing infrastructure (including**
332 **existing communications systems) in designing the Project?**

333 A. Prevailing Wind Park has conducted a microwave beam path analysis and sited in a
334 manner that avoids all identified microwave beam paths and communication
335 systems. Prevailing Wind Park also submitted a Project notification letter to the U.S.
336 Department of Commerce National Telecommunications and Information
337 Administration (“NTIA”). NTIA’s determination is expected around the beginning of
338 June 2018.

339

340 The Department of Defense and the Department of Homeland Security Long Range
341 Radar Joint Program Office’s “pre-screening tool” used to evaluate the impact of
342 wind turbines on air defense long-range radar was applied to the Project Area and
343 returned a result of “no anticipated impact” (green) to Air Defense and Homeland

344 Security radars. Additionally, the Project is not likely to impact weather radar
345 operations at NEXRAD Weather Surveillance Doppler Radar Stations.

346

347 **Q. Will the Project participate in the South Dakota One-Call program?**

348 A. Yes.

349

350 **Q. With respect to use of existing local roads as haul roads, will Prevailing Wind
351 Park coordinate with local road authorities regarding the use and restoration
352 of those roads?**

353 A. Yes. Prevailing Wind Park will coordinate with applicable local road authorities to
354 obtain road use agreements and/or necessary road permits prior to construction to
355 ensure safe and efficient use and to minimize and mitigate Project impacts to haul
356 roads. The road use agreements will also address improvements to existing roads
357 and restoration of haul roads to their pre-construction condition following
358 construction. Additional information concerning haul roads is contained in Sections
359 20.4.1.1 and 20.4.2.1 of the Application.

360

361 **Q. What steps will the Project take to prepare for a potential emergency situation
362 at the Project site during construction and when the Project is operational?**

363 A. Prevailing Wind Park and its construction team will coordinate with local and county
364 emergency management to develop procedures for response to emergencies,
365 natural hazards, hazardous materials incidents, manmade problems, and potential
366 incidents concerning Project construction. During Project operations, the Project
367 operator would coordinate with local and county emergency management for the
368 purpose of protecting the public and the property related to the Project during
369 natural, manmade or other incidents. The Project would register each turbine
370 location and the O&M building with the rural identification/addressing (fire number)
371 system and 911 systems.

372

373 **Q. Has Prevailing Wind Park considered electromagnetic interference in
374 connection with the construction and operation of the Project?**

375 A. Yes. Prevailing Wind Park completed an RF Impact Study, consisting of three
376 sections: microwave point-to-point path analysis; airports, radar stations, and
377 military aircraft operations; and NTIA notification. See Section 15.6 of the
378 Application and Appendix O for additional detail.

379

380 **Q. Will the Project be designed, constructed, and operated in compliance with all**
381 **applicable federal, state, and local regulations?**

382 A. Yes.

383

384 **X. PROJECT BENEFITS**

385

386 **Q. Please describe the local and state benefits the Project will provide.**

387 A. The Project is expected to create both short-term and long-term positive impacts to
388 the local economy. Impacts to social and economic resources from construction
389 activities would be short-term. Local businesses, such as restaurants, grocery
390 stores, hotels, and gas stations, would see increased business from construction-
391 related workers during the construction phase of the Project. Local industrial
392 businesses, including aggregate and cement suppliers, welding and industrial
393 suppliers, hardware stores, automotive and heavy equipment repair, electrical
394 contractors, and maintenance providers, would also likely benefit from construction
395 of the Project. In addition to the direct payments, construction of the Project would
396 create a \$14.9 million boost to the local economy.

397

398 Prevailing Wind Park estimates that \$220,000 of food, supplies, and fuel would be
399 purchased locally by the Project and Project staff annually (or \$20.4 million over the
400 life of the Project). The Project would generate approximately \$60 million in direct
401 economic benefits for local landowners, local communities, and the State of South
402 Dakota. Over the life of the Project (30 years), it would create direct payments of
403 more than:

- 404 • Approximately \$37 million to landowners, including an average of \$1,230,000
405 annually from lease payments;

- 406 • Approximately \$6 million to Bon Homme County, or \$201,000 annually from
407 taxes paid;
- 408 • Approximately \$4.2 million to Charles Mix County, or \$140,000 annually from
409 taxes paid;
- 410 • Approximately \$913 thousand to Hutchinson County, or \$30,500 annually from
411 taxes paid;
- 412 • Approximately \$1.5 million to area school district(s), or \$371,000 annually from
413 taxes paid; and
- 414 • Approximately \$11.1 million to the State of South Dakota, or \$336,000 annually
415 from taxes paid.

416

417 **XI. CONCLUSION**

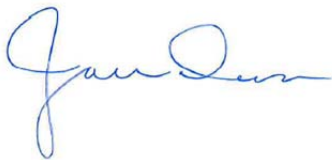
418

419 **Q. Does this conclude your Direct Testimony?**

420 A. Yes.

421

422 Dated this 30th day of May, 2018.



423

424 James Damon