

BEFORE THE SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

DOCKET NO. EL18-053

In the Matter of the Application of Deuel Harvest Wind Energy LLC for a Permit of a Wind Energy Facility and a 345-kV Transmission Line in Deuel County

Pre-Filed Supplemental Testimony and Further Supporting Exhibits of Dean Pawlowski
On Behalf of Otter Tail Power Company
April 10, 2019

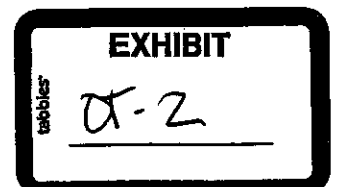


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ATTACHMENTS

Attachment A – Site and Land Parcel Location Maps

1 **I. INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME, POSITION AND BUSINESS ADDRESS.**

3 A. My name is Dean Pawlowski. I am employed by Otter Tail Power Company (Otter Tail
4 or the Company) as its Principal Engineer, Delivery Planning. My business address is 215
5 South Cascade Street in Fergus Falls, Minnesota.

6 **Q. MR PAWLOWSKI, DID YOU PROVIDE DIRECT TESTIMONY FILED IN THIS
7 DOCKET ON MARCH 14, 2019?**

8 A. Yes.

9 **Q. ON WHOSE BEHALF WAS THIS SUPPLEMENTAL TESTIMONY PREPARED?**

10 A. This supplemental testimony was prepared on behalf of intervenor Otter Tail Power
11 Company.

12 **II. PURPOSE OF MY SUPPLEMENTAL DIRECT TESTIMONY**

13 **Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL TESTIMONY IN THIS
14 PROCEEDING?**

15 A. My Supplemental Testimony provides an update to the Commission and the other parties
16 to the case concerning Applicant Deuel Harvest Wind Energy, LLC's (Deuel Harvest Wind
17 or Applicant) plans for its wind generating facility to be located near Gary, South Dakota,
18 known as the Deuel Harvest North Wind Farm (the Project), and the site for the
19 Interconnection Switching Station that I addressed in my pre-filed direct testimony.

20 **III. SITING OF THE INTERCONNECTION SWITCHING STATION AND
21 RELATED INTERCONNECTION FACILITIES**

22 **Q. WHAT ARE THE FACILITIES THAT ARE NEEDED TO DIRECTLY
23 INTERCONNECT THE PROJECT INTO THE EXISTING TRANSMISSION
24 SYSTEM?**

25 A. As I detailed in my Direct Testimony (pages 8:15-10:8), in order to directly interconnect
26 the Project with the existing transmission system, Otter Tail will need to construct a three-
27 breaker switching station (the Interconnection Switching Station) and modify the existing
28 Big Stone South to Brookings 345-kV transmission line.

1 **Q. JUST TO RECAP, WHAT IS OTTER TAIL'S INTEREST IN THIS**
2 **PROCEEDING?**

3 A. As part of its pending Application for Facility Permits (Application) in this proceeding, the
4 Applicant included the Interconnection Switching Station that will be designed,
5 constructed, owned, operated and maintained by Otter Tail. Otter Tail raised concerns
6 about any permits approved by this Commission for the Project that are inclusive of
7 facilities that will be constructed and owned by Otter Tail as part of the regional
8 transmission system.

9 **Q. WHAT IS OTTER TAIL'S PRIMARY ISSUE OF CONCERN WITH THE**
10 **PROJECT AS PROPOSED BY THE APPLICANT?**

11 A. Because the specific location and size of the Interconnection Switching Station described
12 within the Application is not an acceptable option for Otter Tail, we identified potential
13 alternative sites that worked better in terms of safe and reliable options and at a reasonable
14 cost and schedule for the Interconnection Switching Station.

15 **Q. HAVE YOU WORKED WITH THE APPLICANT IN GATHERING THEIR INPUT**
16 **AS PART OF OTTER TAIL'S REVIEW OF ALTERNATIVE LOCATIONS FOR**
17 **THE INTERCONNECTION SWITCHING STATION?**

18 A. Yes, since the filing of my direct testimony, Otter Tail and the Applicant have continued
19 to discuss the various options and alternatives in identifying a site that best meets our siting
20 guidelines and that can work for both Otter Tail and the Applicant.

21 **Q. WHAT IS THE CURRENT STATUS OF THE ALTERNATIVE LOCATIONS FOR**
22 **THE INTERCONNECTION SWITCHING STATION?**

23 A. Otter Tail has now – on April 8, 2019 – acquired an option on a preferred site for its
24 Interconnection Switching Station.

25 **Q. COULD YOU PLEASE DISCUSS THAT PREFERRED SITE?**

26 A. The site Otter Tail prefers and has entered into an option that encompasses up to forty (40)
27 acres in Deuel County, South Dakota on the Southwest Corner of the Southwest Quarter
28 (SW1/4 SW1/4) of Section 12, Township One hundred sixteen (116) North, Range Forty-
29 eight (48) West. A map of the general area addressed by this option and where Otter Tail

1 plans to locate the Interconnection Switching Station (marked preliminary and subject to
2 final design, layout and engineering) can be found at Attachment A, in both a diagram form
3 and satellite image view-based form.

4 **Q. WHY DOES OTTER TAIL VIEW THIS SITE AS PREFERRED OVER THE SITE**
5 **THAT HAD PREVIOUSLY BEEN IDENTIFIED BY THE APPLICANT?**

6 A. As mentioned previously, the preferred site meets our siting guidelines and works to
7 facilitate safe and reliable interconnection of the Project to the regional transmission
8 system, while doing so at a reasonable cost and schedule for the Applicant. Furthermore,
9 this preferred site has the advantages of not only being a good location for interconnection
10 of the Applicant's Project with suitable ingress and egress, but will also allow Otter Tail to
11 keep the extension of the existing Big Stone South to Brookings 345 kV (BSSB) Line to
12 less than one-half mile long while not crossing a public highway or section line. Therefore,
13 Otter Tail will not need to file additional state permits or utilize eminent domain to acquire
14 the necessary right-of-way for the 345-kV transmission line extension.

15 **IV. CONCLUSION**

16 **Q. DO YOU HAVE ANY CONCLUDING REMARKS, MR. PAWLOWSKI?**

17 A. Yes. Otter Tail intervened in this proceeding because of two primary concerns with the
18 Applicant's permit application: (1) the inclusion of facilities that will be designed,
19 constructed, owned, operated and maintained by Otter Tail within the Applicant's permit
20 application; and (2) the proposed location, size, construction siting, and potential
21 conditions that would have applied within any permit for the Project's Interconnection
22 Switching Station. Ultimately, it is Otter Tail that is constructing the Interconnection
23 Switching Station and tapping the BSSB line to accommodate the Applicant's Project.
24 With the preferred site of the Interconnection Switching Station that I discuss in this
25 Supplemental Direct testimony, I believe Otter Tail can more safely and reliably meet its
26 obligations as the Transmission Owner in the Applicant's Project Area while doing so at a
27 reasonable cost and schedule for the Applicant. As a result of the activities that have
28 occurred since the filing of my Direct testimony, we believe the Commission can address
29 the facility permit sought in the Application as only applying to a facility owned by Deuel

1 Harvest, and appropriately conclude no permit needs to be issued pursuant to the
2 Application for any facilities that will be owned by Otter Tail.

3 **Q. DOES THIS CONCLUDE YOUR SUPPLEMENTAL DIRECT TESTIMONY IN**
4 **THIS PROCEEDING?**

5 A. Yes, it does.

A PART OF THE SW $\frac{1}{4}$ OF THE SW $\frac{1}{4}$ OF SECTION 12, TOWNSHIP 116 NORTH
RANGE 48 WEST OF THE 5TH PRINCIPAL MERIDIAN,
DEUEL COUNTY, SOUTH DAKOTA

W $\frac{1}{4}$ COR.
SEC. 12, T. 116, R. 48
PER LCR # 420

BSS BROOKINGS
345 KV STRUCTURE NO. 154

SECTION LINE
RW-

PROPOSED POLE

PRELIMINARY PROPOSED
SWITCHING STATION SITE

BSS BROOKINGS-
345 KV STRUCTURE
NO. 155

AREA = 20.14 AC.

483RD AVENUE

345KV EASEMENT

AREA = 20.16 AC.

SW COR.
SEC. 12, T. 116, R. 48
PER LCR # 402

174TH STREET

BSS BROOKINGS
345 KV STRUCTURE
NO. 158

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

IN THE MATTER OF THE APPLICATION
OF DEUEL HARVEST WIND, LLC FOR A
PERMIT OF A WIND ENERGY FACILITY
AND A 345-kV TRANSMISSION LINE IN
DEUEL COUNTY

EL18-053

CERTIFICATE OF SERVICE

I, Thomas J. Welk, do hereby certify that I am a member of Boyce Law Firm, LLP, attorneys for Otter Tail Power Company and that on the 10th day of April, 2019, a true and correct copy of the Pre-Filed Supplemental Testimony and Further Supporting Exhibits of Dean Pawlowski on Behalf of Otter Tail Power Company and this Certificate of Service were served via email to the following addresses listed:

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Dated this 10th day of April, 2019.



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