

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

**IN THE MATTER OF THE APPLICATION BY
WESTERN MINNESOTA MUNICIPAL POWER AGENCY AND MISSOURI RIVER
ENERGY SERVICES FOR A FACILITY PERMIT FOR AN ENERGY CONVERSION
FACILITY AND ASSOCIATED FACILITIES INCLUDING AN ELECTRIC
TRANSMISSION LINE IN DEUEL COUNTY, SOUTH DAKOTA**

SD PUC DOCKET EL25-028

**PRE-FILED SUPPLEMENTAL DIRECT TESTIMONY OF BRENT MOELLER
ON BEHALF OF WESTERN MINNESOTA MUNICIPAL POWER AGENCY
AND MISSOURI RIVER ENERGY SERVICES**

April 3, 2026

1 **I. INTRODUCTION AND QUALIFICATIONS**

2
3 **Q. Please state your name, employer, and business address.**

4 A. My name is Brent Moeller. I am employed by Missouri River Energy Services (“MRES”).
5 My business address is 3724 West Avera Drive, Sioux Falls, SD 57109-8920.
6

7 **Q. Did you provide Direct Testimony in this docket on August 7, 2025?**

8 A. Yes.
9

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

11 A. The purpose of my Supplemental Direct Testimony is discuss an adjustment to the
12 Toronto Power Plant Project’s 345 kilovolt (“kV”) transmission line (“Route”) along 481st
13 Avenue into the Astoria Substation owned by Otter Tail Power Company (“OTP”), with a
14 corresponding adjustment to the 150-foot-wide right-of-way (“ROW”) centered on the
15 Route.
16

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

18 A. The following exhibits are attached to my Supplemental Direct Testimony:
19 • Exhibit A: Summary of Route Adjustment, with accompanying figures.
20

21 **ROUTE ADJUSTMENT NEAR ASTORIA SUBSTATION**

22
23 **Q. Since the Application was filed in August 2025, have the Applicants made an
24 adjustment to the Route near the Astoria Substation?**

25 A. Yes. The Applicants are proposing an adjustment to the Project’s Route (with a
26 corresponding adjustment to the 150-foot-wide ROW) near the Astoria Substation. The
27 Route proposed in the Application extended south along 481st Avenue for 2.0 miles before
28 turning southeast across a row crop farm field and entering the Astoria Substation from
29 the south side. The current Route extends south along 481st Avenue for 1.5 miles before
30 turning southeast at 193rd Street across a row crop farm field to the Astoria Substation. A
31 redline comparison showing this Route adjustment near the Astoria Substation compared
32 to what was filed with the Application is included as Figure 1 in Exhibit A.
33

34 **Q. Why are the Applicants proposing this Route adjustment?**

35 A. OTP, the owner of the Astoria Substation, requested this change to the original Route in
36 order to avoid conflicts with future facility expansion plans that are being contemplated in
37 this area.
38

39 **Q. As a result of this Route adjustment, are there any new landowners within
40 1/2-mile of the Project?**

41 A. No.

42

43 **Q. Have the Applicants discussed this Route adjustment with the landowners of**
44 **the parcels where the Route adjustment takes place?**

45 A. The Applicants have discussed the Route adjustment with OTP and one of the two other
46 landowners of the parcels where the Route adjustment takes place. OTP and the
47 landowner that the Applicants have been able to communicate with found the Route
48 adjustment to be acceptable. The Applicants are in the process of contacting the other
49 landowner to discuss the Route adjustment and an option agreement for the easement.
50 The Applicants will coordinate with the landowners on structure placement to minimize
51 impacts on farming or other operations.

52

53 **Q. Did the Route adjustment affect the number of landowners from which**
54 **easements must be acquired for the Route?**

55 A. The Route adjustment will require the Applicants to obtain an easement along the
56 property line of one additional landowner. This landowner owns a wind turbine collection
57 substation approximately 260 feet to the west, fence-to-fence, of the Astoria Substation.
58 As mentioned in the response to the prior question, the Applicants are currently reaching
59 out to this landowner to discuss the Route adjustment and an option agreement for the
60 easement. The Applicants believe the landowner will grant the easement because the
61 Applicants expect the landowner is aware of the potential for future development of the
62 Astoria Substation.

63

64 **Q. Did the Route adjustment affect resource impact estimates in the**
65 **Application?**

66 A. Yes, but only slightly. The analysis of existing resources and potential impacts and
67 avoidance, minimization, and mitigation measures in Section 8.0 through 17.0 of the
68 Application remain accurate for the current Project (including the Route adjustment),
69 with a few minor updates. These updates are provided in Exhibit A to my testimony. The
70 Route adjustment will reduce the total number of pole structures for the Route by four or
71 five poles.

72

73 **Q. Does this conclude your Supplemental Direct Testimony?**

74 A. Yes.

75

76

77 Dated this 3rd day of April, 2026.

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81

Brent A. Moeller