

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

**IN THE MATTER OF THE APPLICATION BY NORTHERN STATES POWER
COMPANY, DOING BUSINESS AS XCEL ENERGY, AND OTTER TAIL POWER
COMPANY FOR A FACILITY PERMIT FOR A 765 KV TRANSMISSION FACILITY
AND ASSOCIATED FACILITIES IN GRANT, DEUEL, AND BROOKINGS COUNTIES,
SOUTH DAKOTA**

SD PUC DOCKET _____

**PRE-FILED DIRECT TESTIMONY OF TIMOTHY ROGERS
ON BEHALF OF NORTHERN STATES POWER COMPANY, DOING BUSINESS AS XCEL
ENERGY, AND OTTER TAIL POWER COMPANY**

September 4, 2026

I. INTRODUCTION AND QUALIFICATIONS

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

A. My name is Tim Rogers. I am employed by Northern States Power Company, doing business as Xcel Energy (Xcel Energy). My business address is 414 Nicollet Mall, Minneapolis, Minnesota.

Q. What is your position with Xcel Energy?

A. I am employed as a Senior Manager, Siting and Permitting.

Q. Briefly describe your educational and professional background.

A. I have a Bachelor of Science degree in Biology from the University of Minnesota. I have been employed by Xcel Energy since 2007. My job duties include developing routing and siting for transmission and renewable energy projects including working with landowners, local governments, public agencies and consultants; coordinating with team members, agency staff, consultants and construction managers and crews on permitting and compliance requirements for projects; acquiring federal and state permits for wetlands, water and land crossings; managing compliance filings and tasks related to permitted projects; My statement of qualifications is attached as **Schedule 1**. My job duties include developing routing and siting for transmission and renewable energy projects, including: working with landowners, local governments, public agencies and consultants; coordinating with team members, agency staff, consultants and construction managers and crews on permitting and compliance requirements for projects; acquiring federal and state permits for wetlands, water and land crossings; and managing compliance filings and tasks related to permitted projects. My Statement of Qualifications is attached as **Schedule 1**.

Q. What is your role with respect to the PowerOn Midwest-Big Stone South to Brookings County to South Dakota/Minnesota Border Project (Project)?

A. In my current position, I am responsible for the routing and siting of transmission line projects, including the Project.

II. PURPOSE OF TESTIMONY

Q. What is the purpose of your Direct Testimony?

A. The purpose of my Direct Testimony is to:

- Summarize the public outreach and agency coordination that was conducted for the Project;
- Describe the Project's Proposed Route and the route development process used for the Project;
- Summarize local permitting requirements and identify the potential permits, approvals, and consultations that may be needed for the Project; and
- Discuss the best management practices (BMPs) and restoration practices that will be used for the Project.

Q. What schedules are attached to your Direct Testimony?

A. The following schedule is attached to my Direct Testimony:

- **Schedule 1**: Statement of Qualifications.

Q. Please identify which sections of the Application you are sponsoring for the record.

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

- Section 3.1: Outreach: Public, Tribal, and Regulatory Agencies
- Section 3.3: Routing Development Process
- Section 3.5: County Permitting Requirements
- Section 9.4.5: BMPs During Construction
- Section 9.4.6: Restoration Procedures
- Section 10.1: General Project Location and Route Selection
- Section 10.2: Route Alternatives Considered
- Section 16: Effect on Local Land Use Controls
- Section 20.1: Socioeconomic and Community Resources
- Section 21: Summary of Potential Impacts and Avoidance, Minimization, and Mitigation Measures
- Section 26: List of Potential Permits and Approvals

- Section 27.1: Agency Coordination
- Appendix B: Agency and Stakeholder Correspondence

III. PUBLIC OUTREACH AND AGENCY COORDINATION

Q. Did the Applicants conduct outreach to the public, local governments, and agencies regarding the Project?

A. Yes. The Applicants began public outreach related to the Project in the second half of 2025, and outreach and coordination has continued since that time. Additional detail is provided in Sections 3.1, 10.2, 16, and 27.1, and Appendix B of the Application.

Q. Please describe the Applicants' public outreach in more detail.

A. The Applicants held three rounds of outreach to landowners and stakeholders in the vicinity of the Project. The first round of in-person open houses was in October 2025, the second round was in January 2026, and a third round was held in April 2026. At these open houses, the Applicants provided information about the Project and sought public input regarding the potential routes under consideration. The Project team considered the input received during our route development process.

Q. Please describe the Applicants' outreach to local governments in more detail.

A. The Applicants have been coordinating with Grant, Deuel, and Brookings County since early in the route development process. We have met with and/or presented to officials from each county multiple times and are continuing to actively coordinate with each county. Additional detail is provided in Sections 10.2, 16, and 27.1, and Appendix B of the Application.

Q. Please describe the Applicants' outreach to federal and state agencies in more detail.

A. The Applicants engaged proactively with federal and state agencies, participating in coordination meetings and conducting additional consultations as needed to address agency-specific questions and recommendations. For additional information, see Appendix B of the Application.

1 **Q. Have the Applicants conducted outreach to Tribes?**

2 A. Yes. The Applicants have engaged with Tribes regarding the Project. Twelve Tribes with
3 ancestral ties to the Project area were identified using the U.S. Department of Housing and
4 Urban Development's Tribal Directory Assistance Tool (TDAT) and were contacted by
5 the Project team. Interested Tribes¹ participated in a Project introduction meeting, and the
6 Applicants have held monthly meetings with interested Tribes to seek their input and
7 provide them with updates. Additional information is reflected in Appendix B of the
8 Application.
9

10 **IV. ROUTE DEVELOPMENT PROCESS & PROPOSED ROUTE**
11

12 **Q. What process did the Applicants use to develop a route for the Project?**

13 A. The Applicants selected the Proposed Route through an iterative, multi-step routing
14 process informed by technical analysis, engineering considerations, and stakeholder
15 engagement. The Applicants first identified a study area that included the Project's
16 endpoints² and then identified multiple potential route corridors within the study area. The
17 Applicants developed preliminary routes within these corridors, and the routes were further
18 refined into the Proposed Route after considering input from public and agencies, local
19 land use controls, and environmental resources. Additional information is provided in
20 Section 3.3 of the Application. This section also describes the routing criteria the
21 Applicants applied when developing the Proposed Route.
22

23 **Q. Did the Applicants evaluate alternatives to the Proposed Route?**

24 A. Yes. Our route development process included the evaluation of route alternatives. Those
25 route alternatives are described in Section 10.2 of the Application and depicted on the
26 related maps.

¹ In this instance, the participating Tribes were: Yankton Sioux Tribe; Flandreau Santee Sioux Tribe; Sisseton Wahpeton-Oyate of the Lake Traverse Reservation.

² The Midcontinent Independent System Operator, Inc. designated the endpoints for the Project. The Project must connect to the Big Stone South Substation, the Brookings Substation, and the Lakefield Substation (in Minnesota).

1 **Q. Why did the Applicants select the Proposed Route?**

2 A. The Applicants selected the Proposed Route for inclusion in the Facility Permit Application
3 because it best met the routing criteria, which evaluated (among other things) residential
4 proximity, agricultural impacts, potential impacts to protected resources, and local land use
5 controls.

6
7 **V. OTHER POTENTIAL REQUIRED PERMITS, APPROVALS, AND**
8 **CONSULTATIONS**
9

10 **Q. Other than the Facility Permit from the South Dakota Public Utilities Commission,**
11 **will other permits, approvals, and/or consultations be required for the Project?**

12 A. Yes. Other federal, state, and local approvals are anticipated to be required for the Project.
13 A list of these potential approvals is included in Section 26 of the Application.
14

15 **VI. BEST MANAGEMENT & RESTORATION PRACTICES**
16

17 **Q. Will the Applicants employ BMPs to avoid and minimize potential Project impacts?**

18 A. Yes, certainly. The Applicants are committed to avoiding and minimizing potential human
19 and environmental impacts to the extent practicable and will employ BMPs to do so. These
20 measures are described throughout the Application and summarized in Section 21 of the
21 Application.
22

23 **Q. Will the Applicants restore disturbed areas after construction of the Project?**

24 A. Yes. Once construction is complete in an area, the Applicants will restore disturbed areas
25 to their original conditions to the maximum extent feasible. We will communicate with
26 landowners regarding restoration activities and will repair or compensate for damages due
27 to the Project. Further information is provided in Section 9.4.6 of the Application.

VII. NOTICE

Q. After filing the Application, what mailed noticed do Applicants intend to provide?

A. South Dakota Statute SDCL 49-41B-5.2 requires an Applicant to mail notice to the owner of record of any land located within one-half mile of where a transmission line is to be constructed. Applicants intend to provide landowner notice to all landowners within one mile of the edge of the right-of-way identified in the Application.

Q. Why are Applicants providing broader notice than required?

A. The Applicants are continuing to work with landowners to minimize impacts and do not yet have finality on setback requirements that may apply in Grant and Brookings Counties. The Applicants will be seeking approval to make adjustments to the Proposed Route during the Facility Permit process. The broader notice is intended to ensure that landowners potentially affected by reroutes are notified of the proceeding.

VIII. CONCLUSION

Q. Does this conclude your Direct Testimony?

A. Yes.

Dated this 4th day of September, 2026.

/s/ Timothy Rogers

Timothy Rogers