



CROPP
COOPERATIVE™

October 16, 2026

South Dakota Public Utilities Commission
Capitol Building, 1st floor
500 E. Capitol Ave.
Pierre, SD 57501-5070

RE: Docket number [EL26-028](#)

In the Matter of the Application of Otter Tail Power Company for a Facility Permit for the Big Stone South to Hankinson to Bison 345 kV Transmission Line Project

South Dakota Public Utilities Commission,

It has come to our attention that Otter Tail Power Company, in partnership with Xcel Energy, is considering a route for a 345-kilovolt transmission line that would run approximately 150 miles from Big Stone to Hankinson to Bison. The high-voltage power line is intended to serve the region's energy needs.

The proposed routes travel west of Big Stone and north of Milbank, South Dakota, through Roberts and Grand County. CROPP Cooperative is familiar with this community because we have farmer-owners in Geneseo Township and Melrose Township within the aforementioned counties.

These four farms are a critical part of our South Dakota milk supply and are all with 1/4 to 3/4 of a mile from the proposed transmission line route. In one instance the transmission lines are hundreds of feet from barnyard operations and straddle pasture and cropland. Organic milk from these farms is processed into a range of consumer dairy products and ingredients for commercial dairy buyers. Small, multigenerational farms are an important part of the fabric of our cooperative and the local community.

A primary concern regarding the scale and routing of transmission lines is livestock exposure to electromagnetic field (EMF) stress, also known as stray voltage.

EMF stress is known to significantly affect the health and performance of dairy cattle because of the daily demands of milk production. Across the 27 states where we have farmer-members, our cooperative has observed decreased milk production and poorer cattle health associated with EMF stress. It is an all-too-common problem and is often difficult to mitigate once identified.

In general, stress in any form will negatively affect immune system function. EMF stress is an environmental factor that adds to an animal's overall stress level. Although clinical outcomes vary, we have often observed harmful changes in milk quantity (pounds produced) and quality (measured by somatic cell count) associated with EMF stress exposure. Additionally, EMF has a deleterious impact on reproductively cycles of cattle.

Although authorities often cite literature stating that EMF exposure has no adverse effects on animals, our direct experience working with farms across the United States indicates that it can harm animal health, sometimes with serious consequences.

In organic dairy production, cattle may shelter indoors during inclement weather, but federal law requires them to spend a minimum number of days on pasture and obtain a portion of their feed through grazing during the grazing season. In our experience, consistent with USDA data, organic dairy cattle are dispersed across more of a farm's acreage than their conventional counterparts.

As the South Dakota Public Utilities Commission evaluates the route proposed by Otter Tail Power Company and Xcel Energy, we urge the Commission to strongly consider an alternative route that does not jeopardize dairy farms in Geneseo Township and Melrose Township.

Transmission lines of the proposed scale are likely to adversely affect dairy cattle both indoors and across farm acreage. These effects could hinder milk production and quality, as well as the financial viability of organic dairy farms in the region.

Organic dairy farming is a specialized profession in today's agricultural economy. These operations cannot simply relocate because of their significant land investments and the three-year transition required for land to become certified organic.

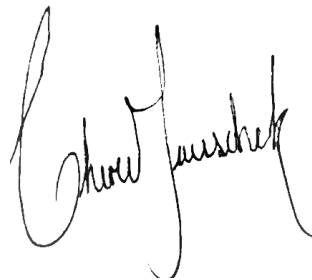
As these families consider options to protect their cattle and livelihoods, our cooperative stands ready to offer counsel and assist and advise them.

We hope this input is helpful as the Commission evaluates the proposed route and permit application.

Sincerely,



Adam Warthesen
Vice President of Government Affairs
& Sustainability



Cheree Tauschek
Executive Vice President of Membership



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