



# Hub City Energy Park

Aberdeen, South Dakota

## Application for an Energy Conversion Facility Permit

*Docket EL26-XXX*

### Appendix G – Socioeconomic Impact Study

October 2026

# NorthWestern Energy

Hub City Energy Park

Socioeconomic Impact Study

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## Executive Summary

NorthWestern Energy Public Service Corporation (NorthWestern Energy) is proposing the Hub City Energy Park (“the Project”), a new nominal 131 MW natural gas-fired generating facility and associated substation located immediately south of Aberdeen in Brown County, South Dakota. The Project would be constructed adjacent to NorthWestern Energy’s existing Aberdeen Generating Station and would include a multiyear construction period followed by long-term operation. Construction is expected to employ approximately 200 workers at peak, while operation is anticipated to employ 10 permanent employees.

Our analysis indicates that the Aberdeen and Brown County area has sufficient population, housing, workforce, and public service capacity to accommodate the Project. The relatively small permanent workforce is not expected to create significant long-term demand for housing, schools, health care, recreation, law enforcement, fire protection, or other local government services.

| Summary of Findings and Recommendations |                                                                                                                                                                  |
|-----------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Study Area                              | Determination                                                                                                                                                    |
| 1 – Population                          | No Significant Impact                                                                                                                                            |
| 2 – Labor Force                         | No Significant Impact                                                                                                                                            |
| 3 – Housing Market                      | No Significant Impact                                                                                                                                            |
| 4 – Industrial Sector                   | No Significant Impact                                                                                                                                            |
| 5 – Agricultural Sector                 | No Significant Impact                                                                                                                                            |
| 6 – Land Values and Property Taxes      | No Significant Impact                                                                                                                                            |
| 7 – School Districts                    | No Significant Impact                                                                                                                                            |
| 8 – Waste Management                    | No Significant Impact                                                                                                                                            |
| 9 – Wastewater Treatment and Collection | Mitigations Recommended – Secure wastewater permits and conduct additional investigation into current treatment capacity at Aberdeen Water Reclamation Facility. |
| 10 – Law Enforcement                    | No Significant Impact                                                                                                                                            |
| 11 – Fire Protection                    | No Significant Impact                                                                                                                                            |
| 12 – Health                             | No Significant Impact                                                                                                                                            |
| 13 – Recreation                         | No Significant Impact                                                                                                                                            |
| 14 – Energy                             | No Significant Impact                                                                                                                                            |
| 15 – Cultural Impact                    | No Significant Impact                                                                                                                                            |
| 16 – Transportation                     | Mitigation Recommended – Haul road agreement and transportation permits.                                                                                         |

The primary areas requiring additional coordination or mitigation are related to wastewater and transportation. Transportation impacts are expected to be concentrated during construction, particularly from construction traffic and heavy-haul deliveries. While no major transportation capacity

concerns were identified, mitigation efforts during the construction phase such as designated routes and avoidance of certain road segments were recommended.

In aggregate, the Project is not expected to create significant long-term socioeconomic impacts within Aberdeen or Brown County. The area has sufficient housing, workforce, and public service capacity to accommodate the small increase in permanent workforce. Any socioeconomic impacts from the construction phase will be temporary. At the same time, the Project is expected to provide sustained economic benefits to the community through the creation of permanent jobs and an expansion of the local property tax base.

## Introduction

NorthWestern Energy Public Service Corporation (NorthWestern Energy) is proposing to site its Hub City Energy Park (the “Project”), a power plant and substation across the street from its current Aberdeen Generating Station south of the City of Aberdeen in Brown County, South Dakota. The Project Site is comprised of

- Lot 1 at 440 135th Street SW (Parcel Identification Number 32640),
- Lot 2 at 270 135th Street SW (Parcel Identification Number 32641), and
- Lot 3 at 90 135th Street SW (Parcel Identification Number 32642).

The Project site is located on the northeast corner of Brown County Road 14W (135th Street) and Brown County Road 10 (S. 5th Street/387th Avenue) and lies approximately 1,200 feet south of the Aberdeen city limits. The Project will include the development of a new nominal 131 MW (gross) natural gas-fired plant to be constructed adjacent to the existing Aberdeen Generating Station.

The Project will entail a multiyear construction phase followed by an ongoing operational phase. NorthWestern Energy anticipates that the construction phase will employ approximately 150 to 250 workers during peak construction. The Project will support between 6 and 10 permanent employees during operation. Throughout this report we adopt 200 workers during peak construction and 10 permanent employees as the baseline for analysis. Because the permanent operational workforce is relatively small, the Project is expected to utilize the existing regional labor force. During construction, the workforce is expected to be supplemented by workers commuting from surrounding communities and from specialized contractors brought in from outside the region.

This Socioeconomic Impact Study is in service to NorthWestern Energy’s responsibilities under ARSD 20:10:22:23 to assess and prepare a report for the Local Review Committee regarding the potential social and economic effects of the proposed facility and the affected area’s capacity to absorb those effects at various stages of construction, and to formulate mitigation measures.

The report is organized as follows. Sections 2 through 4 report on the Project’s potential effects on the area population, workforce, and housing. Sections 5 and 6 explore the impacts in the area’s industrial and agricultural sectors. Section 7 reports anticipated impacts on land values and property taxes before transitioning into Section 8, which discusses the Project’s potential impacts on the Aberdeen and Warner school districts. Sections 9 through 14 discuss potential impacts on public services including, wastewater and drinking water systems, law enforcement, transportation, fire protection, healthcare facilities, and recreation. Section 15 discusses impacts on energy infrastructure. Section 16 discusses the impact on agricultural production and land use. Section 17 discusses potential historic, religious, archaeological impacts from the Project. Section 18 provides a short discussion of the Project’s economic impacts on area employment, incomes, and overall economic activity based on the most current Project information available at the time of this writing. Finally, section 19 summarizes this report’s findings and offers our conclusions regarding the Project’s potential socioeconomic impacts.

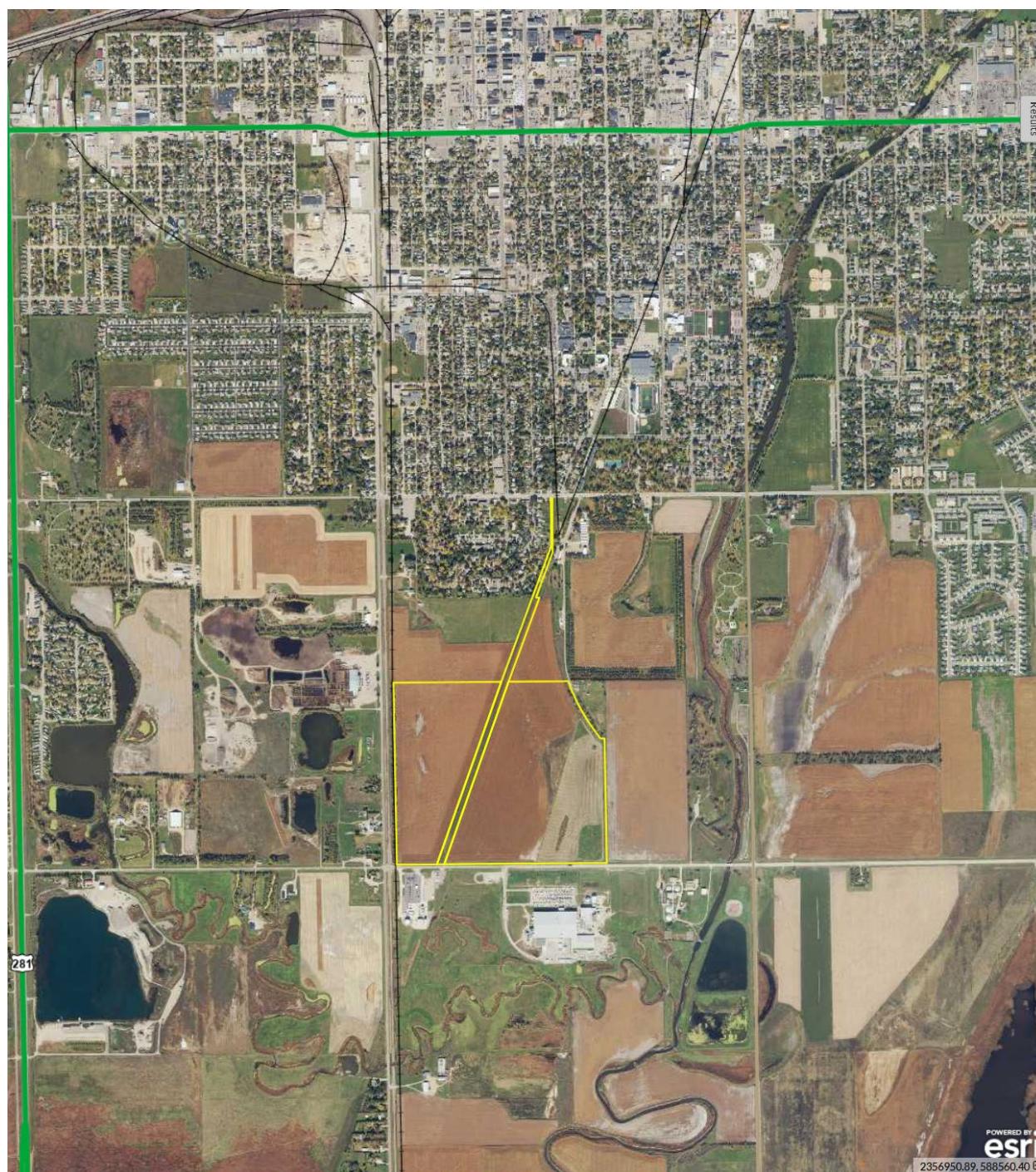


Figure 1: Proposed Project Location

# 1 Population Demographics

The City of Aberdeen is South Dakota's third largest city, and Brown County is the state's third most populous county. According to the 2024 American Community Survey (ACS) 5-year estimates, Brown County had an estimated population of 37,877 residents living in 16,285 households. The City of Aberdeen accounted for approximately 28,189 residents and 12,469 households. Average household size was similar in both geographies at approximately 2.2 persons per household. (U.S. Census Bureau 2024).

Table 1: Population Summary, 2024 ACS 5-Year Estimates

| Variable               | Brown County | Aberdeen |
|------------------------|--------------|----------|
| Population             | 37,877       | 28,189   |
| Households             | 16,285       | 12,469   |
| Median Age             | 37.8         | 36.4     |
| Population Under 18    | 8,948        | 6,307    |
| Population 65+         | 6,731        | 4,628    |
| Average Household Size | 2.26         | 2.18     |

Long-term demographic trends also provide context for future housing demand. As shown in Table 2, Lightcast projects the Brown County population to decline by approximately 3% between 2024 and 2031, while the populations of South Dakota and the United States are projected to increase by approximately 6% and 4%, respectively. Although population projections are inherently uncertain, the projected decline in Brown County suggests that the Project, which will create new permanent jobs in the region, will help to combat population decline. (Lightcast 2025).

Table 2: Aberdeen 7-Year Population Forecast

| Geography                | 2024 Population | 2031 Population | Change     | Percent Change |
|--------------------------|-----------------|-----------------|------------|----------------|
| Brown County             | 41,522          | 40,448          | -1,074     | -3%            |
| South Dakota             | 924,669         | 981,683         | 57,014     | 6%             |
| United States of America | 340,110,988     | 354,603,779     | 14,492,791 | 4%             |

## 2 Labor Force

This section discusses the current labor market conditions in Brown County. We focus here on Brown County for a few reasons. First, county-level employment and workforce data for South Dakota is generally of higher quality at the county- rather than city-level. Second, because Aberdeen serves as the primary employment center in Brown County, a county-level analysis is highly reflective of more local conditions in the City of Aberdeen. Finally, a significant share of jobs in the City of Aberdeen are staffed by residents of surrounding communities in Brown County.

### 2.1 Current Labor Market Overview

Understanding the broader labor market provides context for evaluating the workforce available to support the Project. Although operation of the Project would require only a small permanent workforce, projected employment trends provide insight into the long-term stability and growth of the regional labor market. Table 3 summarizes projected employment growth for Brown County compared with South Dakota and the United States (Lightcast 2025).

| Table 3: Brown County 5-Year Job Forecast |                |                |           |                |
|-------------------------------------------|----------------|----------------|-----------|----------------|
| Geography                                 | 2025 Job Count | 2030 Job Count | Change    | Percent Change |
| Brown County                              | 17,386         | 17,608         | 222       | 1.3%           |
| South Dakota                              | 534,984        | 559,515        | 24,531    | 4.6%           |
| United States of America                  | 175,418,295    | 183,229,361    | 7,811,066 | 4.5%           |

Table 3 indicates that employment in Brown County is projected to increase from approximately 17,386 jobs in 2025 to 17,608 jobs in 2030, representing an increase of approximately 222 jobs (1.3%). While employment is expected to continue growing, the projected growth rate is lower than both the statewide (4.6%) and national (4.5%) forecasts. The relatively limited employment growth projected for Brown County is generally consistent with the slight population decline projected for the Aberdeen area during the same period. Overall, these forecasts suggest that the regional labor market is expected to remain relatively stable through 2030 and the additional labor demand created by the Project can be readily met by the area's workforce.

### 2.2 Utility Industry Detail

As shown in Table 4, the utilities sector (NAICS 22) employed approximately 137 workers in Brown County in 2025 and experienced employment growth of approximately 13% between 2020 and 2025. Average earnings per job were approximately \$127,700, indicating that jobs within the utilities industry are generally high paying (Lightcast 2025).

| Table 4: Utility Sector Employment Summary |       |
|--------------------------------------------|-------|
| Metric                                     | Value |
| Employment                                 | 137   |
| 5-year Growth (2020-2025)                  | 13%   |

|                      |           |
|----------------------|-----------|
| Avg Earnings per Job | \$127,733 |
|----------------------|-----------|

As shown in Table 5, Brown County maintained an overall unemployment rate of approximately 2% in 2025, while Lightcast estimates an unemployment rate of approximately 0% within the utilities industry (NAICS 22). This suggests that workers with utility-related experience are generally employed and that employers seeking experienced utility workers may need to recruit from the existing workforce or surrounding labor markets (Lightcast 2025).

| Table 5: Unemployment Rate |              |
|----------------------------|--------------|
|                            | Brown County |
| All Industries             | 1.98%        |
| Utilities (NAICS 22)       | 0.00%        |

Workforce demographics for the utilities industry are summarized in Table 6. Employees between the ages of 35 and 54 account for more than one-half of total employment, while workers under the age of 25 represent less than 9% of the workforce, pointing to a utility workforce that is experienced and closer to retirement age (Lightcast 2025).

| Table 6: Utilities, Industry Breakdown |                   |         |
|----------------------------------------|-------------------|---------|
| Age Bucket                             | Number of Workers | Percent |
| 14-18                                  | 0                 | 0%      |
| 19-24                                  | 12                | 8.8%    |
| 25-34                                  | 22                | 16.1%   |
| 35-44                                  | 40                | 29.2%   |
| 45-54                                  | 34                | 24.8%   |
| 55-64                                  | 23                | 16.8%   |
| 65+                                    | 5                 | 3.6%    |

In addition to the broader utilities industry, Dakota Institute evaluated employment characteristics for the electric power distribution industry (NAICS 221122), which is the industry classification used by Lightcast for the existing NorthWestern Energy generating facility. This provides a more accurate basis for evaluating the labor market impacts of the Project.

As shown in Table 7, Brown County contained approximately 74 jobs within the electric power distribution industry in 2025 and experienced employment growth of approximately 2% between 2020 and 2025. Average earnings were approximately \$154,792 per job, exceeding those reported for the broader utilities industry (Lightcast 2025).

| Table 7: Electric Power Distribution Industry, Industry Breakdown |           |
|-------------------------------------------------------------------|-----------|
| Metric                                                            | Value     |
| Employment                                                        | 74        |
| 5-year Growth (2020-2025)                                         | 2%        |
| Avg Earnings per Job                                              | \$154,792 |

Workforce demographics for the electric power distribution industry are similar to the broader utilities industry; employment is concentrated among experienced workers between the ages of 35 and 54. 18% of workers are age 55 or older, indicating that a portion of the existing workforce may approach retirement over the coming years (Lightcast 2025).

These existing labor market characteristics, together with the operation of the existing NorthWestern Energy Aberdeen Generating Station, indicate that the Aberdeen area already supports occupations with skills similar to those required for operation of the Project. However, given the relatively small size of the electric power distribution workforce and the limited availability of experienced workers within the utilities industry, some of the approximately 10 permanent operational positions may require recruitment from outside the immediate Aberdeen area.

### 3 Housing Market

Potential housing impacts associated with the Project are primarily related to the temporary construction workforce and 10 permanent employees expected during operation. Dakota Institute reviewed existing population and housing characteristics to evaluate the ability of the Aberdeen area to accommodate these workers and determine whether the Project is likely to affect local housing availability.

Table 8: Housing, 2024 ACS 5-Year Estimates

| Variable               | Brown County | Aberdeen |
|------------------------|--------------|----------|
| Total Housing Units    | 18,090       | 13,664   |
| Occupied Housing Units | 16,285       | 12,469   |
| Vacant Housing Units   | 1,805        | 1,195    |
| Vacant Units for Rent  | 539          | 475      |
| Owner Occupied Units   | 11,014       | 7,688    |
| Renter Occupied Units  | 5,271        | 4,781    |
| Homeowner Vacancy Rate | 1.4%         | 1.7%     |
| Rental Vacancy Rate    | 9.1%         | 8.9%     |

According to the 2020–2024 ACS 5-year estimates, Brown County contained approximately 18,090 housing units in 2024, of which 16,285 were occupied and 1,805 were vacant. Within Aberdeen, approximately 13,664 housing units were identified, including 12,469 occupied units and 1,195 vacant units. Because the ACS 5-year estimates are based on survey responses collected over a five-year period, they provide a stable measure of long-term housing characteristics rather than current housing market conditions. (U.S. Census Bureau 2024).

Table 9: Active Listings, June 2026

| Home Type       | Brown County | Aberdeen |
|-----------------|--------------|----------|
| Homes for Sale  | 158          | 139      |
| Rental Listings | 70           | 69       |

Current housing market conditions also indicate the availability of existing housing inventory. As of June 2026, Realtor.com reported approximately 139 homes for sale within Aberdeen. Together, the available rental housing identified by the ACS and the current homes and rental listings available on the market indicate that the Aberdeen area has sufficient housing capacity to accommodate potential new residents during and after construction. (Realtor.com 2026; U.S. Census Bureau 2024).

When contacted regarding potential local impacts, the Brown County Sheriff referenced the previous construction of the Applied Digital data center in Ellendale, North Dakota as an example of a project that created temporary housing challenges because of its substantially larger construction workforce and the need for new workforce housing. The Project differs from the Ellendale project in a few different ways. The Project is expected to employ approximately 200 workers during peak construction and 6 to 10 permanent employees during operation. In addition, NorthWestern Energy has indicated that the Project will encourage the use of local contractors where practical, reducing the number of temporary workers who may require housing in the Aberdeen area. Based on these differences and the ample supply of housing in the market already, the temporary housing conditions experienced during construction of the Ellendale project are not expected to occur in Aberdeen.

Given the availability of existing single-family homes and rental units, the Project is not anticipated to substantially affect housing availability or require additional residential development. Even if all permanent employees relocated to Aberdeen and required rental housing, they would represent approximately 6% of single-family homes for sale or 14% of rentals currently listed in Brown County. Because construction employment is temporary and NorthWestern Energy intends to utilize local contractors where possible, temporary housing demand is expected to be accommodated through existing rental housing, hotels, campgrounds, and commuting from surrounding communities rather than requiring additional long-term residential development.

## 4 Industrial Sector Impacts

The Project site is surrounded by a mix of parcels zoned as industrial (H-I, Heavy Industrial, and L-I, Light Industrial) and agricultural (AG-P, Agricultural Preservation and AG-P2, Water). The Project site was rezoned in April 2025. Lots 1 and 3 are now zoned H-I, Heavy Industrial, and Lot 2 is zoned AG-P, Agricultural Preservation. The rezoning is not yet reflected on the Official Zoning Map on the Brown County Planning Commission website.

During construction there could be some traffic-related disruptions to NorthWestern Energy's existing generation plant and the DemKota Ranch Beef processing plant due to the movement of materials and equipment to and from the Project site. In the long-run, however, the Project is expected to have no appreciable negative impacts on nearby industrial sites.

## 5 Agricultural Sector Impacts

The Project will be sited on an approximately 176-acre site that had previously been zoned for agricultural use. The Project necessitates that the land shift from agricultural to industrial use, but the 176-acre site represents only a small fraction of available agricultural land in Brown County. Accordingly, a U.S. Department of Agriculture, Natural Resources Conservation Service review, conducted as part of

the Project's planning review, indicated that the Project will not affect Prime Farmland. Because the converted area is small relative to the agricultural land base in Brown County, the Project is not anticipated to substantially affect agricultural production, livestock operations, or the availability of farmland within Brown County.

NorthWestern Energy is also evaluating alternative natural gas pipeline routes to serve the Project. At the time of this report, a final pipeline route has not been selected. Depending on the selected route, temporary utility easements may be required across agricultural land. Utility easements typically allow agricultural activities to continue following construction while providing access for operation and maintenance of the pipeline. Temporary construction impacts associated with any pipeline installation would be expected to be minimized through restoration of disturbed agricultural land following construction.

## 6 Land Values and Property Taxes

The approximately 176-acre site's value is expected to increase substantially after development. The Project is not expected to influence property values for nearby industrial sites including NorthWestern Energy's existing Aberdeen Generating Station and the DemKota Ranch Beef processing plant. Agricultural properties with single-family homes along 387<sup>th</sup> Ave and immediately adjacent to the Project may experience some adverse impact due to their proximity, but other agricultural properties further from the Project site are unlikely to experience similar impacts.

The value of the platted property at the Project site will increase significantly once the site is developed. Once operational, NorthWestern Energy estimates that its first year property taxes for the Project will be between \$1.6 to \$2.0 million. This internal estimate is based on historical mill rates and payments at other sites. Application of the discretionary formula which allows a five-year phase in for full property tax obligations (i.e. 20% of full property tax value in year 1, 40% in year 2, and rising to 100% in year 5) would reduce NorthWestern Energy's initial obligation, but the discretionary formula is not guaranteed. In light of this uncertainty, we report the full amount of NorthWestern Energy's estimated property tax liability here.

## 7 School District Considerations

### 7.1 Aberdeen School District

#### 7.1.1 Enrollment Capacity

The Project is located within the Aberdeen School District 06-1, which serves the City of Aberdeen and surrounding portions of Brown County. Potential impacts to the school district are generally associated with permanent Project employees and their families who may relocate to the area. Because the Project is expected to employ 10 permanent workers, any increase in student enrollment is expected to be limited.

Enrollment trends provide additional context for evaluating Aberdeen School District's ability to accommodate potential population growth associated with the Project. Table 10 summarizes PK-12 enrollment over the past seven school years.

| Table 10: Aberdeen School District PK-12 Enrollment |                  |
|-----------------------------------------------------|------------------|
| Year                                                | Total Enrollment |
| 2025-26                                             | 4,134            |
| 2024-25                                             | 4,237            |
| 2023-24                                             | 4,265            |
| 2022-23                                             | 4,326            |
| 2021-22                                             | 4,409            |
| 2020-21                                             | 4,477            |
| 2019-20                                             | 4,483            |

Enrollment declined from 4,483 students during the 2019-20 school year to 4,134 students during the 2025-26 school year, a decrease of approximately 349 students (7.8%). According to Aberdeen School District, this decline has primarily been driven by lower birth rates within Brown County. (Aberdeen School District 06-1 2025).

To further evaluate potential Project impacts, the Superintendent of Aberdeen School District, Dr. Becky Guffin, was contacted. Dr. Guffin confirmed that Aberdeen School District has sufficient capacity to accommodate a modest increase in enrollment. While two grade sections at one school are currently at enrollment capacity, nearby schools within Aberdeen School District have available capacity to accommodate additional students if needed.

Dr. Guffin also noted that the Aberdeen Technical Education Center (ATEC) Academy provides career and technical education programs across all career clusters, including opportunities for industry certifications and dual-credit coursework through partnerships with area businesses. These programs provide a local workforce development resource for students interested in technical and skilled occupations.

Based on existing enrollment trends and input from Aberdeen School District, the Project is not anticipated to have a significant impact on school enrollment or educational services.

### 7.1.2 Property Tax Revenue

South Dakota school districts receive property tax revenue from taxable property located within their boundaries. The taxable valuation of property within Aberdeen School District provides context for the existing tax base. Annual taxable valuations and levy rates, as reported by the South Dakota Department of Education, are summarized in Tables 11 and 12. (South Dakota Department of Education 2025).

**Table 11: 2024 Payable 2025 Taxable Valuations, Aberdeen 06-1**

| Property Classification | Taxable Valuation |
|-------------------------|-------------------|
| Agricultural            | \$408,071,668     |
| Owner Occupied          | \$1,864,127,263   |
| Other Non-Ag/Utilities  | \$963,826,507     |
| Total                   | \$3,236,025,438   |

The total taxable valuation was approximately \$3.24 billion, with owner-occupied residential property accounting for approximately 58% and other non-agricultural property, commercial property, utilities, and industrial property accounting for approximately 30%. The Project will add taxable valuation to the Other Non-Ag/Utilities property classification within Aberdeen School District limits. This additional valuation will help to shift a portion of the property tax burden away from owner-occupied and agricultural property and, all else equal, reduce the mill rates required to generate a given level of property tax revenue.

**Table 12: 2024 Payable 2025 Levy per Thousand, Aberdeen 06-1**

| Levy Category          | Levy per \$1,000 of Taxable Value |
|------------------------|-----------------------------------|
| Agricultural           | \$1.197                           |
| Owner Occupied         | \$2.679                           |
| Other Non-Ag/Utilities | \$5.544                           |
| Special Education      | \$1.288                           |
| Capital Outlay         | \$2.828                           |
| Bond Redemption        | \$0.000                           |

Current district levy rates vary by property classification in accordance with South Dakota law. Because the Project will be located within the Aberdeen School District, it has the potential to contribute additional taxable valuation and property tax revenue. Given Aberdeen School District existing property tax base and the relatively small permanent workforce associated with the Project, it is not anticipated to adversely affect the Aberdeen School District's financial capacity or ability to provide educational services. (South Dakota Department of Education 2025).

## 7.2 Warner School District

Warner School District 06-5 serves the community of Warner and the surrounding portions of Brown County. Although the Project is located within the Aberdeen School District, Warner School District is also considered due to its close proximity.

### 7.2.1 Enrollment Capacity

Warner School District is much smaller than Aberdeen School District, with enrollment consistently around 300 students in recent years. Table 13 summarizes the PK-12 enrollment since the 2019-20 school year.

| Table 13: Warner School District PK-12 Enrollment |                  |
|---------------------------------------------------|------------------|
| Year                                              | Total Enrollment |
| 2025-26                                           | 311              |
| 2024-25                                           | 313              |
| 2023-24                                           | 312              |
| 2022-23                                           | 314              |
| 2021-22                                           | 315              |
| 2020-21                                           | 314              |
| 2019-20                                           | 312              |

Enrollment has remained largely unchanged, ranging from 311 to 315 students over the past 7 school years. Enrollment totaled 312 students in 2019-20 and 311 in 2025-26, indicating no significant increase or decrease over the period.

Warner School District has established enrollment limits by grade level, as shown in Table 14. These limits range from 22 students per grade in kindergarten through 2<sup>nd</sup> grade to 28 students per grade in high school.

| Table 14: Warner School District Enrollment Limits, |                          |                  |                        |
|-----------------------------------------------------|--------------------------|------------------|------------------------|
| Grade Level                                         | Enrollment Cap per Grade | Number of Grades | Total Enrollment Limit |
| Junior Kindergarten                                 | 8 students               | 1                | 8                      |
| Kindergarten – 2 <sup>nd</sup> Grade                | 22 students              | 3                | 66                     |
| 3 <sup>rd</sup> Grade – 5 <sup>th</sup> Grade       | 24 students              | 3                | 72                     |
| 6 <sup>th</sup> Grade – 8 <sup>th</sup> Grade       | 26 students              | 3                | 78                     |
| 9 <sup>th</sup> Grade – 12 <sup>th</sup> Grade      | 28 students              | 4                | 112                    |
| Total Enrollment Capacity                           |                          |                  | 336                    |

With enrollment of 311 students in the 2025-26 school year, total Warner School District enrollment is 25 students below the combined enrollment limits, equivalent to approximately 7.4% of the Warner School District's total capacity. However, this difference should not be interpreted as 25 available seats that could necessarily be accommodated at any grade level. Because the limits apply separately to each grade, available capacity depends on the distribution of current enrollment across grades.

To further evaluate potential Project impacts, Warner School District Superintendent Kroll was contacted regarding existing capacity and the potential for additional enrollment associated with the Project. Superintendent Kroll indicated that, despite capacity constraints in several individual grades, Warner School District would be able to accommodate a small increase in enrollment across its classrooms. He also noted that housing availability within Warner School District is limited, which is expected to constrain the number of Project-related families that could relocate within Warner School District boundaries.

### 7.2.2 Property Tax Revenue

Warner School District has a much smaller and agriculturally concentrated tax base than Aberdeen School District. The district has approximately \$318.1 million in taxable valuation for 2024 Payable 2025, as shown in Table 15. Agricultural property accounted for approximately 71% of total taxable valuation, followed by owner-occupied property at 23% and other non-agricultural property and utilities at 6%.

| Table 15: 2024 Payable 2025 Taxable Valuations, Warner 06-5 |                   |
|-------------------------------------------------------------|-------------------|
| Property Classification                                     | Taxable Valuation |
| Agricultural                                                | \$225,315,755     |
| Owner Occupied                                              | \$73,648,750      |
| Other Non-Ag/Utilities                                      | \$19,178,270      |
| Total                                                       | \$318,142,775     |

Levy rates for Warner School District are shown in Table 16. The general education levy rates for agriculture, owner-occupied, and other non-agricultural property are established by property classification, while Warner School District also levies for special education, capital outlay, and bond redemption.

| Table 16: 2024 Payable 2025 Levy per Thousand, Warner 06-5 |                                   |
|------------------------------------------------------------|-----------------------------------|
| Levy Category                                              | Levy per \$1,000 of Taxable Value |
| Agricultural                                               | \$1.197                           |
| Owner Occupied                                             | \$2.679                           |
| Other Non-Ag/Utilities                                     | \$5.544                           |
| Special Education                                          | \$1.134                           |
| Capital Outlay                                             | \$2.319                           |
| Bond Redemption                                            | \$0.358                           |

Because the Project is located within Aberdeen School District rather than Warner School District, the Project would not directly add taxable valuation to Warner's property tax base except through future economic growth. Any fiscal effects on Warner School District would instead be associated with Project-related residential development or population growth occurring within District boundaries. Given the relatively small permanent workforce anticipated for the Project and limited housing availability within Warner School District, substantial Project-related residential growth within Warner School District is not anticipated. Consistent with this expectation, Warner School District anticipates minimal impacts to student enrollment associated with the Project.

## 8 Waste Management

Waste generated during construction activities will be disposed of at a properly permitted waste site in accordance with the laws of South Dakota. Construction waste disposal will be the responsibility of the prime construction contractor responsible for construction of the Project.

Waste generated during operational activities will be disposed of at a properly permitted waste site in accordance with the laws of South Dakota. Operational waste disposal will be the responsibility of NorthWestern Energy and will likely be handled by a private waste collection and disposal company.

### 8.1 Brown County Landfill Sites

| Table 17: Brown County Landfill |                                                                            |
|---------------------------------|----------------------------------------------------------------------------|
| Characteristic                  | Value                                                                      |
| Operator                        | Brown County                                                               |
| Facility Type                   | Municipal Solid Waste Landfill                                             |
| Location                        | 13225 379 <sup>th</sup> Ave                                                |
| Distance from Site              | Around 5 miles                                                             |
| Permitted Capacity              | <150,000 tons/years                                                        |
| Accepted Waste                  | MSW, construction debris, yard waste, appliances, electronics, scrap metal |

The Brown County Landfill is a permitted regional municipal solid waste landfill. Under South Dakota regulations, regional municipal solid waste landfills are authorized to accept municipal solid waste, industrial and commercial waste, and construction and demolition waste materials. (South Dakota Department of Agriculture and Natural Resources 2025).

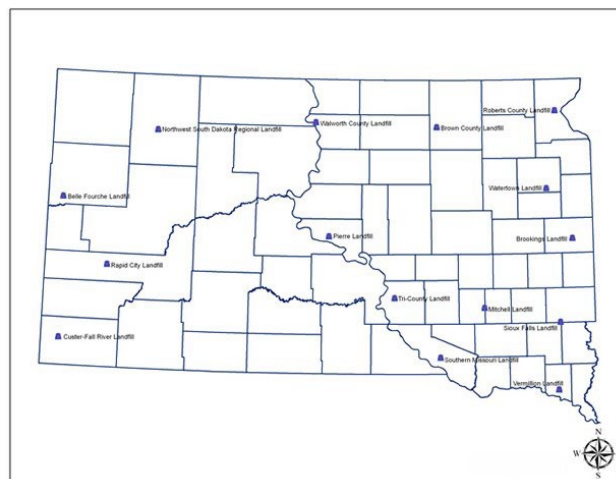


Figure 2: Waste Disposal Facilities

Construction and operational waste generated by the Project will be managed through existing permitted waste disposal facilities in accordance with applicable South Dakota regulations. As a result, operation of the Project is not anticipated to adversely affect existing solid waste management capacity within Brown County.

## 9 Drinking Water and Wastewater

### 9.1 Existing Water System

The City of Aberdeen owns and operates the municipal water system serving residential, commercial, and industrial customers throughout the city. The system utilizes both surface water and groundwater sources. Surface water is obtained from the Elm River through a river intake northeast of Aberdeen, while groundwater is supplied by three municipal wells. Water is treated at the Aberdeen Water Treatment Plant before being distributed through the municipal water system. The use of both surface water and groundwater sources provides operational flexibility and helps maintain a reliable municipal water supply. (City of Aberdeen 2025a).

The Aberdeen Water Treatment Plant has a design capacity of 12.0 million gallons per day (MGD). Current average water demand is approximately 3.6 MGD, with a peak daily demand of approximately 9.0 MGD. The distribution system serves approximately 9,700 customers (8,715 residential and 1,006 commercial) and includes 8.0 million gallons of ground storage and 2.5 million gallons of elevated storage. Based on current average demand, the treatment plant operates at approximately 30% of its design capacity, indicating that additional treatment capacity is available to accommodate future demand. (City of Aberdeen 2025a).

| Table 18: City of Aberdeen Water System |                               |
|-----------------------------------------|-------------------------------|
| Characteristic                          | Value                         |
| Water Source                            | Elm River and municipal wells |
| Treatment Plant Capacity                | 12.0 MGD                      |
| Average Daily Demand                    | 3.6 MGD                       |
| Peak Daily Demand                       | 9.0 MGD                       |
| Water Customers                         | Approximately 9,700           |
| Ground Storage                          | 8.0 million gallons           |
| Elevated Storage                        | 2.5 million gallons           |

As shown in Table 18, the Aberdeen Water Treatment Plant currently maintains available treatment and storage capacity beyond existing demand. Given the relatively small operational workforce associated with the Project and the available capacity within the municipal water system, the Project is not anticipated to have a significant impact on the city's water supply or distribution system.

Water use at the Project once operational is expected to range from approximately 10 gallons per minute (gpm) when the evaporative coolers are out of service to approximately 90 gpm when they are in service. The evaporative coolers typically do not operate at ambient temperatures below 59 degrees Fahrenheit. At peak use, this equals approximately 0.13 MGD, about 1.1% of the treatment plant's 12.0 MGD capacity and well within the approximately 3.0 MGD of capacity remaining on peak demand days. Given the free capacity within the existing system, the Project is not expected to have an adverse impact on the area's water system.

## 9.2 Existing Wastewater System

Wastewater generated within the City of Aberdeen is collected through the municipal sanitary sewer system and conveyed to the Aberdeen Water Reclamation Facility for treatment prior to discharge. The system serves residential, commercial, and industrial customers throughout the city. The treatment plant has a design capacity of approximately 6.0 MGD and currently treats an average of approximately 2.5 MGD, or about 42% of its treatment capacity. The City has recently invested in improvements to the wastewater treatment system to maintain compliance with state and federal regulations and accommodate future demand. (City of Aberdeen 2025a).

Based on the available treatment capacity and recent infrastructure improvements, wastewater generated by the Project is not expected to significantly affect the City's wastewater collection or treatment system. But additional investigation should be conducted to ensure that there have been no recent changes in treatment capacity that were not captured in the 2025 Water & Sewer Rate Study.

## 10 Law Enforcement

### 10.1 Brown County Sheriff's Office

The Brown County Sheriff's Office provides law enforcement services for the unincorporated areas of Brown County, including the Project site. Emergency communications are provided through the Brown County Communications Center, which dispatches law enforcement, fire, and EMS throughout the county. (Brown County 2025).

To evaluate the potential effects of the Project on law enforcement and public safety services, Brown County Sheriff Dave Lunzman was contacted. Sheriff Lunzman indicated that while the Project may result in some increase in law enforcement activity during construction, he does not anticipate the need for additional law enforcement resources or significant impacts to public safety services. Sheriff Lunzman noted that coordination with law enforcement, emergency management, and fire personnel regarding emergency response procedures, facility access, and designated points of contact would be beneficial prior to operation. He also noted that industrial facilities can occasionally be targets of vandalism, making established response procedures and Project points of contact valuable for local emergency responders.

Based on information provided by the Brown County Sheriff's Office, the Project is not anticipated to result in significant impacts to local law enforcement or public safety services.

Sheriff: Dave Lunzman

22 Court Street, Suite 1  
Aberdeen, SD 57401  
Phone: 605-626-7100

#### Staffing

- 65 full-time employees

- 20 part-time employees

## 10.2 Aberdeen Police Department

The Aberdeen Police Department provides law enforcement services within the City of Aberdeen and on the Northern State University campus. Although the Project is located outside the city limits, the department may help through mutual aid agreements if requested. (City of Aberdeen 2025b).

To evaluate the potential effects of the Project on law enforcement and public safety services, Aberdeen Chief of Police Tanner Jondahl was contacted. Chief Jondahl indicated that larger construction projects have historically resulted in some increase in calls for service associated with temporary workforces; however, he does not anticipate the need for additional law enforcement resources as a result of the Project. He also noted that advance communication with Project contractors, including designated points of contact, would facilitate coordination should law enforcement assistance be needed during construction.

Based on information provided by the Aberdeen Police Department, the Project is not anticipated to result in significant impacts to local law enforcement or public safety services.

Chief of Police: Tanner Jondahl  
114 2nd Avenue SE  
Aberdeen, SD 57401

Phone: 605-626-7000

### Staffing

- 56 commissioned officers
- 7 civilian employees
- 2 reserve officers

### Annual Activity

- Approximately 29,000 calls for service annually

## 11 Fire Protection

Fire protection and emergency response services for the Project would be provided by Aberdeen Fire & Rescue, which serves the City of Aberdeen and surrounding areas. The department provides fire suppression, emergency medical services, hazardous materials response, technical rescue, fire prevention, and other emergency response services. Aberdeen Fire & Rescue also maintains mutual aid agreements with neighboring fire departments to provide additional emergency response resources when needed. (City of Aberdeen 2025c).

To evaluate the potential effects of the Project on fire protection services, Fire Chief Joel Weig was contacted. Chief Weig indicated that the Project may result in a modest increase in EMS calls and the potential for hazardous materials and technical rescue responses during the construction phase. Chief Weig did not identify the need for additional personnel, equipment, or specialized training associated with the Project. The Chief noted that Project-specific preplanning, including emergency access, site

contacts, and familiarity with the Project and emergency response procedures, would be appropriate

**Table 19: Aberdeen Fire & Rescue Fire Suppression Vehicles**

| Apparatus            | Quantity | Water Tank Capacity (gal.) | Pump Capacity (gpm) |
|----------------------|----------|----------------------------|---------------------|
| Ladder Truck         | 1        | 500                        | 1,500               |
| Rescue Pumpers       | 3        | 750                        | 1,500               |
| Wildland/Brush Truck | 1        | 300                        | 240                 |

prior to construction.

The primary fire suppression vehicles and specialized response equipment maintained by Aberdeen Fire & Rescue are summarized in Tables 19 and 20 based on information provided by Fire Chief Joel Weig.

**Table 20: Aberdeen Fire & Rescue Specialized Response Equipment**

| Equipment                     | Quantity |
|-------------------------------|----------|
| Ambulances                    | 5        |
| Skid Steers                   | 2        |
| Gator UTV                     | 1        |
| Polaris Ranger UTV            | 1        |
| Hazardous Materials Trailers  | 2        |
| Urban Search & Rescue Trailer | 1        |
| Support Vehicles              | 8        |

Based on information provided by Aberdeen Fire & Rescue, the Project is not anticipated to require additional fire protection infrastructure or personnel. Project-specific emergency planning and coordination prior to construction would further support emergency response capabilities.

Fire Chief: Joel Weig  
121 SE Second Ave.  
Aberdeen, SD 57401  
Phone: (605) 626-7048

## 12 Health

Avera St. Luke's Hospital is the primary hospital serving Aberdeen and the surrounding region. The facility is licensed for 50 acute care beds and an additional 10 inpatient behavioral health beds. The hospital operates a 24-hour emergency department and is the region's only Level III Trauma Center, providing comprehensive emergency care with continuous physician coverage. In addition to emergency services, Avera St. Luke's offers inpatient and outpatient care, surgical services, diagnostic imaging, and specialty medical care, and serves as a regional referral center for northeastern South Dakota. (Avera Health. 2025a).

Avera Acute Care is a walk-in medical clinic located on the Avera St. Luke's campus. The clinic provides same-day treatment for non-life-threatening illnesses and injuries, with on-site laboratory and diagnostic imaging services. Patients requiring emergency or inpatient care are referred to Avera St. Luke's Hospital, while the clinic expands access to outpatient medical care for Aberdeen and the surrounding area. (Avera Health. 2025b).

Based on the relatively small permanent workforce associated with the Project and the capabilities of the local medical facilities, significant impacts to the local hospital or medical service facilities are not anticipated.

## 13 Recreation

The Project is located outside the Aberdeen city limits in Brown County, near the City of Aberdeen, which maintains a variety of public parks, athletic facilities, and recreation amenities (City of Aberdeen 2025d). To evaluate potential impacts to these resources, Dakota Institute contacted the Aberdeen Parks, Recreation and Forestry Department regarding anticipated effects during construction and operation.

### 13.1 City Parks

Several public recreation facilities are located within the vicinity of the Project, including Sunshine Park, Anderson Park, and 12th Street Park. Recreational athletic facilities include the Moccasin Creek Softball & Soccer Complex, which contains youth and adult softball diamonds and soccer fields, and the Players Softball Complex, which contains adult softball diamonds. The Kuhnert Arboretum, a 19-acre public arboretum, is also located nearby (City of Aberdeen 2025d).

The Aberdeen Parks, Recreation and Forestry Department indicated that it does not anticipate significant impacts to these facilities during construction or operation. The department noted that the Kuhnert Arboretum could experience temporary effects from construction-related noise, dust, or truck traffic if construction activities coincide with the Tuesday evening summer concert series held during June and July. Because construction activities would generally be expected to occur during normal daytime working hours, any overlap with evening events would likely be limited.

### 13.2 Wylie Park Campground

Wylie Park Campground is located approximately 4 to 5 miles northwest of the Project and provides temporary lodging opportunities for construction personnel, if needed. The campground includes approximately 106 RV campsites with water and electrical service, 67 full-hookup sites, 23 camping cabins, and tent camping areas. Additional amenities include shower and laundry facilities. The campground operates seasonally (City of Aberdeen 2025d).

The Aberdeen Parks, Recreation and Forestry Department also indicated that the Project is not expected to substantially affect campground operations or campsite availability. While construction personnel could utilize the campground, reservations are typically made months in advance through a phased

reservation system, limiting the potential for large groups to reserve substantial numbers of campsites during the operating season.

Based on existing recreation resources and input from the Aberdeen Parks, Recreation and Forestry Department, the Project is not anticipated to result in significant impacts to public parks, athletic facilities, or campground operations. Temporary construction-related effects, including noise, dust, and truck traffic near the Kuhnert Arboretum, are expected to be localized and limited to the construction period. Long-term operational impacts to recreation facilities are not anticipated.

## 14 Energy

### 14.1 Existing Energy Infrastructure

South Dakota's electric generation system utilizes a diverse mix of energy resources. According to the U.S. Energy Information Administration (EIA), wind energy accounts for the largest share of electricity generation within the state, followed by hydroelectric power, natural gas, and coal. Although renewable resources account for most electricity generation statewide, natural gas remains an important component of South Dakota's electric system by providing dispatchable generation that can operate when needed to support grid reliability (U.S. Energy Information Administration 2025).

**Table 21: South Dakota Electricity Generation by Fuel Source**

| Fuel Source   | Share of Generation |
|---------------|---------------------|
| Wind          | 59%                 |
| Hydroelectric | 21%                 |
| Natural Gas   | 11%                 |
| Coal          | 8%                  |

The Project will be constructed adjacent to the existing NorthWestern Energy Aberdeen Generating Station, which also operates using natural gas as the primary fuel. As a result, the Project will expand an existing natural gas generating site rather than establish a new energy generation area. The Project area is already served by electrical transmission infrastructure and natural gas facilities necessary to support electric generation (U.S. Energy Information Administration 2025).

### 14.2 Community Energy Impacts

Because the Project will be constructed adjacent to an existing natural gas generating facility, the Project will expand existing energy infrastructure rather than introduce a new type of industrial development to the area. Required natural gas and electric transmission improvements will be constructed specifically to serve the Project (U.S. Energy Information Administration 2025).

Construction activities will result in temporary energy demands associated with equipment, construction trailers, and support facilities. During operation, the Project will become part of NorthWestern Energy's existing electric generation system while utilizing dedicated natural gas and electric infrastructure developed as part of the Project. Accordingly, operation of the Project is not

anticipated to substantially affect the availability or reliability of electricity or natural gas service for existing residential, commercial, or industrial customers within Brown County. More broadly, the Project is being developed to improve the overall availability and reliability of NorthWestern Energy's electric system.

Based on the existing natural gas generating facilities already located at the Project site, the existing transmission and pipeline infrastructure serving the area, and the Project-specific utility improvements proposed by NorthWestern Energy, the Project is not anticipated to have significant long-term impacts on community energy infrastructure or the availability and reliability of utility services within Brown County.

## 15 Cultural Impact

Two cultural resource studies were completed for the Project: an initial records review of the broader site, followed by an on-the-ground field survey of the actual Project footprint. The records review (Leuchtmann 2026) found no known archaeological sites on or near the property, though it identified several historic buildings, an old railroad alignment, and a cemetery in the surrounding one-mile area — none located on the Project site itself. Because the ground had not yet been physically inspected, HDR recommended a follow-up field survey before construction.

In June 2026, HDR archaeologists walked the entire 21.3-acre permanent Project footprint, inspecting the ground surface, photographing site conditions, and produced a subsequent report (Fuller, Leuchtmann, and Schumacher 2026) detailing their findings. Visibility was excellent (90–100%), and no digging or subsurface testing was needed, since the area had already been substantially disturbed by decades of farming and by recent grading for an equipment staging pad. No historic buildings or other above-ground historic resources were found within a mile of the footprint.

The survey identified one archaeological site: a scatter of old debris spread across about 2.5 acres, consisting mostly of bottle glass, cans, brick, and similar household refuse, along with one possible stone tool fragment. A second, smaller debris scatter was found nearby on a pile of soil that had been mechanically moved during construction of the staging pad; because that soil had already been relocated, HDR did not consider it part of the same site.

Based on these findings, HDR concluded that the site does not qualify for listing on the National Register of Historic Places, and that the Project will have no adverse effect on cultural resources. No further archaeological work or mitigation was recommended for the permanent Project footprint.

## 16 Transportation

A full analysis of the Project's transportation impacts and recommendations for mitigating expected issues can be found in the 2026 HDR Traffic Study for the Project (HDR Traffic Study (2026)). We present here only a summary of the full findings and recommendations contained in the HDR Traffic Study (2026).

The Project will be accessed using the existing regional highway network and local Brown County roads. Primary access is provided by US Highway 281 and US Highway 12, both of which serve as principal regional transportation corridors for passenger vehicles, commercial traffic, and freight movement within northeastern South Dakota. South Dakota Highway 37 provides an additional north-south route east of the Project area and serves as an alternate regional connection. Construction workers, equipment, and materials are expected to utilize these existing highways before accessing local roads serving the Project.

As of 2026, bridge rehabilitation work is underway on US Highway 281 over Moccasin Creek south of Aberdeen. According to the South Dakota Department of Transportation (DOT), the project is expected to be completed in fall 2026. Consequently, the bridge construction project should not impact NorthWestern Energy's proposed construction plan. (South Dakota Department of Transportation 2025).

The HDR Traffic Study (2026) evaluated existing roadway conditions, forecast construction- and operations-related traffic impacts, and developed recommendations to minimize effects on the surrounding transportation network within a defined Study Area bounded by U.S. Highway 281, 391st Avenue, U.S. Highway 12, and 139th Street.

Existing daily traffic volumes on local roadways in the Study Area are relatively low, ranging from 1,600 to 6,169 vehicles per day, with the DemKota Ranch beef plant identified as the largest existing traffic generator. Roadway surfaces vary from paved county and state routes to unpaved (gravel) segments, and five bridges/culverts within the Study Area were evaluated, all rated in fair to good condition (one in poor condition).

Construction of the Project is projected to add approximately 200 vehicles per day to area roadways, with permanent operations generating minimal traffic thereafter (up to 10 employees and two deliveries daily). The study concluded that this increase would not create significant capacity impacts on most Study Area roadways, and that a traffic detour would likely not be warranted. The one exception identified was 134th Street, a City of Aberdeen roadway whose existing ADT (6,169) already exceeds the South Dakota DOT capacity threshold (2,500 ADT) for that roadway type; the study recommends construction and workforce traffic avoid this segment unless the South Dakota DOT approves a higher threshold. Nine heavy haul shipments (combustion turbine, generator, and generator step-up transformer components) are anticipated, likely arriving by rail with final delivery by truck; specific heavy-haul routing had not yet been finalized by equipment suppliers at the time of the study. The study also noted that the South Dakota DOT has state highway construction/resurfacing projects planned in the Study Area during the anticipated construction schedule (FY 2027–2029), which should be considered when finalizing construction routing.

Overall, the Traffic Study did not identify any major transportation concerns associated with the Project. Its recommendations, intended to be implemented by the construction contractor and equipment suppliers, include:

- **Signage:** Installation of a construction/delivery signage plan to clearly define the approved route for site traffic, meeting MUTCD standards and subject to South Dakota DOT Aberdeen Region

Engineer approval; consideration of portable message boards on U.S. Highway 281 near 135th Street.

- **Heavy Haul Routes:** Development of a dust control plan for any gravel haul segments; township/county agreements addressing roadway maintenance and dust and snow control during construction; a geotechnical assessment of gravel road structural adequacy where applicable; securing over-width/overweight permits; inspection of bridges and culverts not subject to routine biennial inspection; and verification of current pavement and bridge conditions prior to finalizing routes.
- **Additional Recommendations:** Avoidance of 134th Street (capacity), 387th Avenue between 135th and 136th Streets (adjacent residential uses), and unpaved segments of 135th Street and 388th/389th Avenues by construction and workforce vehicles; and coordination with South Dakota DOT's planned FY 2027–2029 roadway construction schedule when finalizing construction and heavy-haul routing.

## 17 Potential Economic Impacts

### 17.1 Construction Phase

Detailed costs estimates for the Project were unavailable at the time of this analysis because the Project is still in planning stages, but it is possible to project potential impacts using an employment-based model. We used the anticipated peak-employment level of approximately 200 jobs as our baseline. Because we use peak employment, rather than total employment over the entire Project, the results presented here will under estimate the total impact of the Project. At the same time, it is also important to note that these impacts will be spread out over the entire construction phase. Peak employment on the site may only be maintained for a number of weeks or months, mitigating potential strains on local infrastructure.

The construction phase impact model was built in Lightcast using the Power and Communication Line and Related Structures Construction industry (NAICS 237130) in Brown County. Table 22, the construction phase at its peak is estimated to generate a total employment impact of approximately 327 jobs in Brown County. This activity is associated with approximately \$28.5 million in labor income, \$78.8 million in economic output, and \$43.7 million in value added, or gross regional product (GRP). The total impact includes the initial construction activity as well as additional economic activity supported throughout the local economy.

| Table 22: Scenario Results |            |                       |                     |                     |
|----------------------------|------------|-----------------------|---------------------|---------------------|
| Impact                     | Jobs       | Earnings/Labor Income | Sales/Output        | Value Added/GRP     |
| Direct                     | 200        | \$21,477,561          | \$56,004,264        | \$29,517,110        |
| Indirect                   | 41         | \$2,518,045           | \$7,823,436         | \$4,548,771         |
| Induced                    | 87         | \$4,521,314           | \$15,013,924        | \$9,629,095         |
| <b>Total</b>               | <b>327</b> | <b>\$28,516,920</b>   | <b>\$78,841,624</b> | <b>\$43,694,976</b> |

Based on the modeled projections from Lightcast, the Project is estimated to generate a temporary increase in employment and economic activity within Brown County during the construction phase. The model estimates that a peak construction workforce of approximately 200 workers could support a total employment impact of approximately 327 jobs and \$78.8 million in economic output. These results represent modeled estimates based on the assumptions described above, and actual impacts will depend on the final construction workforce and the extent to which workers, contractors, and Project-related spending are sourced within Brown County. Indirect and induced impacts generally flow to existing business in the region. Job impacts in these areas should not be thought of as *new* jobs in the community, especially for a construction project. Instead, the Project's impact in these areas should be thought of as supporting or sustaining existing employment and business activity.

The construction industry accounts for the largest share of modeled employment, with approximately 206 jobs. Additional employment is distributed across a range of industries, with the largest impacts occurring in health care and social assistance, retail trade, accommodation and food services, real estate and rental and leasing, and other services.

The modeled construction activity is also expected to generate tax revenue at the local, state, and federal levels. As shown in Table 23, Lightcast estimates approximately \$1.6 million in taxes on production and imports, including approximately \$618,000 at the local level, \$545,000 at the state level, and \$464,000 at the federal level. These estimates may not account for tax exemptions or credits that may apply to the Project, which would reduce tax revenues accordingly.

Table 23: Taxes on Productions and Imports, Lightcast Impact

| Tax Type | Tax Value   |
|----------|-------------|
| Local    | \$617,558   |
| State    | \$544,953   |
| Federal  | \$464,133   |
| Total    | \$1,626,643 |

## 17.2 Long-Run Economic Impact

We estimated the long-run economic impact model using Lightcast. The model assumes 10 new employees are added to the electric power distribution industry in Aberdeen, SD. This industry is where NorthWestern Energy's current employment in Aberdeen is reported. The model assumes future employee income will align with current industry averages, and that the Project will operate similarly (in terms of inter-industry business relationships) as the current Aberdeen Generating Station.

The Project will create 10 permanent employees and generate a total economic impact of approximately 38 jobs, \$3.1 million in annual labor income, \$16.4 million in annual economic output, and \$11.1 million in annual GDP growth. These estimates represent modeled economic impacts and include the initial Project activity as well as subsequent supply chain and household spending effects. The actual impact will vary depending on compensation levels for Project employees and the timing of hiring, and the extent to which the new positions are filled with current or future residents.

| Table 24: Estimated Operational Economic Impacts |      |                       |              |                 |
|--------------------------------------------------|------|-----------------------|--------------|-----------------|
| Impact                                           | Jobs | Earnings/Labor Income | Sales/Output | Value Added/GDP |
| Direct                                           | 10   | \$1,603,254           | \$11,940,960 | \$8,642,140     |
| Indirect                                         | 7    | \$360,523             | \$1,324,514  | \$841,068       |
| Induced                                          | 21   | \$1,183,042           | \$3,131,187  | \$1,659,487     |
| Total                                            | 38   | \$3,146,819           | \$16,396,661 | \$11,142,696    |

Table 25 summarizes the expected federal, state, and local tax impact of the Project once fully operational. As with the construction phase impacts, these tax impact estimates may not account for tax exemptions or credits that may apply to the Project, which would reduce tax revenues accordingly.

| Table 25: Taxes on Productions and Imports, Lightcast Impact |             |
|--------------------------------------------------------------|-------------|
| Tax Type                                                     | Tax Value   |
| Local                                                        | \$756,567   |
| State                                                        | \$637,527   |
| Federal                                                      | \$416,202   |
| Total                                                        | \$1,810,296 |

## 18 Conclusions

This Socioeconomic Impact Study evaluated the potential effects of the Project across sixteen study areas encompassing population, workforce, housing, industrial and agricultural activity, land values and property taxes, school districts, public services, cultural resources, transportation, and energy infrastructure. Fourteen of these areas resulted in a determination of no significant impact, reflecting the ability of Aberdeen and Brown County to absorb both the temporary construction workforce of approximately 200 workers and the modest permanent operational workforce of 10 employees without measurable strain on housing, schools, health care, law enforcement, fire protection, or recreation.

The remaining two areas—wastewater treatment and transportation—do not reflect underlying capacity constraints, but rather routine planning considerations common to projects of this scale. Confirming current treatment capacity at the Aberdeen Water Reclamation Facility and securing the applicable wastewater permits are administrative steps that can be completed well in advance of operation. Likewise, the transportation measures recommended in the HDR Traffic Study (2026)—including a haul road agreement, a designated construction route, and avoidance of specific segments such as 134th Street—are targeted, temporary measures tied to the construction period rather than signs of a transportation network unable to accommodate the Project. With these measures in place, the Project’s remaining socioeconomic footprint is expected to be minimal.

At the same time, the Project is expected to generate substantial economic benefits for the Aberdeen and Brown County area. The Project’s approximately 10 permanent, high-paying positions are estimated to support a total ongoing employment impact of approximately 38 jobs, \$3.1 million in annual labor income, \$16.4 million in annual economic output, and \$11.1 million in annual GDP, together with approximately \$1.8 million in combined annual tax revenue. The Project will also expand the non-agricultural property tax base within Aberdeen School District, helping to shift a portion of the tax

burden away from owner-occupied and agricultural property, and is expected to generate between \$1.6 and \$2.0 million in property taxes during its first year of operation. Because the Project will be built adjacent to NorthWestern Energy's existing Aberdeen Generating Station, it will further strengthen the area's electric generation and transmission infrastructure. In a county projected to see a modest population decline over the coming years, the durable, well-paying jobs and expanded tax base associated with the Project represent a meaningful counterweight to that trend.

Taken as a whole, the findings of this study indicate that the Project is not expected to create significant adverse socioeconomic impacts within Aberdeen or Brown County, and that any effects during construction will be temporary and readily managed through standard coordination and mitigation measures. At the same time, the Project offers durable economic benefits—including permanent employment, expanded tax revenue, and additional generating capacity—that position the area for continued economic growth well beyond the construction period.

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## 19 References

- Aberdeen School District 06-1. 2025. *Enrollment data and district information*. Aberdeen, South Dakota.
- Avera Health. 2025a. *Avera St. Luke's Hospital*.
- Avera Health. 2025b. *Avera Acute Care – Aberdeen*.
- Brown County. 2025. *Sheriff's Office*. Brown County, South Dakota.
- City of Aberdeen. 2025a. *Aberdeen Water & Sewer Rate Study 2025*. Aberdeen, South Dakota.
- City of Aberdeen. 2025b. *Police Department*. Aberdeen, South Dakota.
- City of Aberdeen. 2025c. *Fire & Rescue*. Aberdeen, South Dakota.
- City of Aberdeen. 2025d. *Parks, Recreation & Forestry*. Aberdeen, South Dakota.
- Fuller, Rhea, Amy Leuchtmann, and Lauren Schumacher. 2026. *Aberdeen III Generating Station Level III Intensive Survey: Aberdeen, Brown County, South Dakota, Section 25, Township 123N, Range 64W*. HDR Engineering, Inc.
- HDR. 2026a. *Phase I Environmental Site Assessment: Aberdeen III Generating Station Project, Aberdeen, South Dakota*. Prepared for NorthWestern Energy Public Service Corp.
- HDR. 2026b. *Traffic Study: Aberdeen III Generating Station & Substation, Aberdeen, SD*. Prepared for NorthWestern Energy.
- Leuchtmann, Amy. 2026. *Level I Cultural Resources Record Search: Mystery Ranch Project, Brown County, South Dakota*. Memorandum to Carrie Shuler, NorthWestern Energy. Dallas, TX: HDR Engineering, Inc., April 3, 2026.
- Fuller, Rhea, Amy Leuchtmann, and Lauren Schumacher. 2026. *Aberdeen III Generating Station Level III Intensive Survey*. Aberdeen, Brown County, South Dakota, Section 25, Township 123N, Range 64W. Report prepared for NorthWestern Energy Public Service Corp. HDR Engineering, Inc., July 8, 2026.
- Lightcast. 2025. *Labor market analytics database*. Lightcast, Moscow, Idaho.
- Realtor.com. 2026. *Housing market inventory for Brown County and Aberdeen, South Dakota*.
- South Dakota Department of Agriculture and Natural Resources. 2025. *Brown County landfill information, water resources, and environmental data*.
- South Dakota Department of Education. 2025. *Property tax valuations and school district levy information*.
- South Dakota Department of Transportation. 2025. *South Dakota Traffic Information System and roadway data*.

U.S. Census Bureau. 2024. *American Community Survey 2020–2024 Five-Year Estimates*.

U.S. Energy Information Administration. 2025. *South Dakota: State Profile and Energy Estimates*. U.S. Energy Information Administration