

July 8, 2022

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

**RE: Docket HP22-001**

On behalf of Consumer Energy Alliance (CEA), I write today to thank the South Dakota Public Utilities Commission for receiving public comments on the carbon dioxide transmission pipeline, Midwest Carbon Express.

Founded in 2006, CEA is a nonpartisan, nonprofit organization advocating for a balanced energy policy and responsible access to resources. CEA represents virtually every sector of the U.S. economy – from the iron and steel industry to truckers, airlines, agriculture, labor organizations, restaurants, chemical manufacturers, small businesses, and families all across the nation – that are concerned about U.S. energy policies, energy security, and long-term price and supply stability. CEA has more than 550,000 individual members and over 375 academic, non-profit, corporate, and union affiliates throughout the United States.

Our members support a rational, all-of-the-above energy policy that utilizes all of our domestic natural resources – both traditional and renewable – while ensuring commonsense environmental protections are in place.

Since our founding, CEA and its members have strongly supported actions that thoughtfully advance our nation towards a cleaner, more environmentally responsible energy future, including emissions reductions that help meet our nation's climate goals. We believe that responsible solutions should always consider the needs of consumers while leveraging and supporting the development of state-of-the-art technologies to improve our environmental stewardship and aid in the continued reduction of all emissions – including smog-forming and greenhouse gases.

To meet our climate challenges, the International Energy Agency has stated that countries around the world must capture and sequester 1.15 billion metric tons of carbon dioxide every year, 30-times more than what we are managing today. With industrial production outpacing pre-pandemic levels, these facilities should be the top priority for climate action – especially since no one solution can address the critical issues being faced by each of our country's various economic sectors.

The proposed carbon dioxide pipeline before the Commission is an example of a carbon management solution that would allow for the capture of up to 12 million tons of CO<sub>2</sub> each year – the equivalent of removing the emissions of 2.6 million vehicles from our roads. By

accomplishing this, it will allow fuels like the ethanol being produced in South Dakota to play an important role in reducing our dependence on imported energy while also lowering emissions.

With sixteen ethanol plants operating across the state, South Dakota is the nation's fifth-largest fuel ethanol producer while also ranking fourth in the nation in ethanol production capacity at 1.4 billion gallons annually. All of these facilities utilize more than half of the corn harvested each year – the state's primary crop – as a feedstock.

Safely capturing, transporting, and storing the CO<sub>2</sub> emissions from these ethanol plants will ensure that South Dakota's ethanol industry will be able to continue to supply fuel that will meet new regulations calling for minimized emissions as the country looks to aggregate cumulative impact. Moreover, it will also ensure South Dakota's corn farmers will be able to market their harvests locally, as each facility contributes about \$200 million annually to their local communities.

More than meeting our environmental goals, the proposed project will allow families, farmers, and local businesses across the state to continue having access to affordable, reliable fuel and ensure the stability of the industry that provides it. The stable and predictable energy supplies supported by investments in projects like this will help them power their lives, make payroll, and support local communities.

We appreciate the opportunity to offer these comments and urge the South Dakota Public Utilities Commission to evaluate not just the economic benefits projects like Midwest Carbon Express will deliver but also the continued environmental benefits these projects will provide to South Dakota.

Sincerely,

Chris Ventura  
Executive Director  
Consumer Energy Alliance-Midwest