BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

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

SD PUC DOCKET EL25-028

PRE-FILED DIRECT TESTIMONY OF MATT THOMAS
ON BEHALF OF WESTERN MINNESOTA MUNICIPAL POWER AGENCY
AND MISSOURI RIVER ENERGY SERVICES

December 19, 2025

I. INTRODUCTION AND QUALIFICATIONS

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

A. My name is Matt Thomas. I am employed by Stanley Consultants. My business address is 8501 W. Higgins Rd., Chicago, IL 60631.

Q. On whose behalf are you providing this testimony?

A. I am providing this testimony on behalf of Western Minnesota Municipal Power Agency ("WMMPA") and Missouri River Energy Services ("MRES") (collectively, "Applicants") in support of their Facility Permit Application ("Application") to the South Dakota Public Utilities Commission.

Q. Briefly describe your educational and professional background.

A. I have approximately 23 years of experience in engineering, 17 years in power generation and 6 years in industrial building systems. In my current role, I am a Principal Mechanical Engineer in Stanley Consultants' Power group, leading mechanical design efforts on power plant projects of various types and sizes. My responsibilities include development of engineering calculations, drawings, specifications, and interfacing with contractors and utilities. I have a Bachelor of Science in Mechanical Engineering from Carnegie Mellon University. I am a registered professional engineer in 20 states. My resume is attached as **Exhibit A**.

Q. Are you familiar with the Toronto Power Plant Project ("Project")?

A. Yes, the Project includes an energy conversion facility and associated facilities being developed by WMMPA, through its agent MRES. The Project is located within Deuel County, South Dakota, approximately 2 miles north of Toronto, South Dakota. The transmission line component of the Project extends from the power plant site to the existing Astoria 345-kV substation owned by Otter Tail Power Company ("OTP Substation").

Q. What is your role with respect to the Project?

A. I am providing technical expertise as needed on specific plant systems, including the natural gas system.

II. PURPOSE OF TESTIMONY

Q. What is the purpose of your Direct Testimony?

A. The purpose of my testimony is to provide an overview of the proposed natural gas piping needed to connect the Project to the Northern Border Pipeline (NBP).

Q. What exhibits are attached to your Direct Testimony?

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

- Exhibit A: M. Thomas Resume.

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 25.0: Statement Required Describing Gas or Liquid Transmission Line Standards of Construction and Gas or Liquid Transmission Line Description

III. OVERVIEW OF PROPOSED NATURAL GAS PIPELINE

Q. Please provide an overview of the planned gas pipeline for the Project.

A. The major features of the planned gas pipeline system are:

- The Project will connect to an existing NBP interstate pipeline at a new gas yard at the site. From this gas yard approximately 350 feet of new piping will be installed to connect to the combustion turbines. The new gas yard and new piping will be on property owned by WMMPA. The gas yard will include metering and pressure regulating equipment. No compressor stations or storage facilities will be included.
- The total capacity of the new Project pipeline will be approximately 2,800 MMBtu/hr. The usage for the new combustion turbines is approximately 1,400 MMBtu/hr, with 1,400 MMBtu/hr capacity reserved for future use.
- The design pressure of the new Project pipeline from the NBP pipeline to the gas yard will be approximately 1,440 psig. The design pressure of the pipeline from the gas yard to the combustion turbines, downstream of the pressure regulating equipment, will be approximately 600 psig.
- All pipelines and associated components will be designed and fabricated in accordance with applicable Codes and industry standards. The pipeline installed by NBP will be designed per ASME B31.8 – Gas Transmission and Distribution Piping, and 49 CFR part 192. The pipeline downstream of the NBP meter will be designed per ASME B31.1 – Power Piping. A cathodic protection system will be included for the new pipeline.

Q. Will the proposed gas transmission line cause changes in flow in the gas transmission facilities connected to the proposed facility?

A. As discussed in Section 25.2 of the Application, the Project will interconnect with NBP transmission facilities. Because flow conditions on the NBP system are dynamic, flow characteristics cannot be reliably determined for a pipe interconnection that operates on a demand basis. The Project represents a normal use of the NBP system and is not expected to alter existing flow patterns.

IV. CONCLUSION

Q. Does this conclude your Direct Testimony?

A. Yes.

Dated this 19th day of December, 2025.

_____

Matt Thomas