

EXHIBIT 1
Direct Testimony
Mark L. Lux

Before the Public Service Commission
of the State of Wyoming

In the Matter of the Application of
Black Hills Power, Inc. d/b/a Black Hills Energy for a Non-Situs Certificate of Public
Convenience and Necessity to Construct and Operate Six New Dual-Fuel Reciprocating Internal
Combustion Engine Generating Units and Related Facilities in Pennington County, South Dakota

Docket No. 20002-__-EN-25
(Record No. ____)

March 28, 2025

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ATTACHMENTS

Attachment MLL-1	RICE Attributes
Attachment MLL-2	RICE Temperature Derate Performance
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Attachment MLL-6	West Peak Energy Study
Attachment MLL-7	Decommissioning Estimate
Attachment MLL-8	O&M Budget

1 **I. INTRODUCTION AND QUALIFICATIONS**

2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A. My name is Mark Lux. My business address is 7001 Mt. Rushmore Road, P.O. Box 1400
4 Rapid City, SD 57709-1400.

5 **Q. PLEASE DESCRIBE YOUR EMPLOYMENT.**

6 A. I am currently employed by Black Hills Service Company, LLC, a wholly owned
7 subsidiary of Black Hills Corporation (“BHC”), as Vice President Power Delivery. I am
8 responsible for the following with respect to each of BHC’s electric utility subsidiaries:
9 generation fleet, generation dispatch and power marketing, and environmental services.
10 The electric generation and generation dispatch responsibility includes the operation,
11 construction and dispatch of over 1 gigawatt of electrical power generation assets to serve
12 the customers of BHC subsidiaries, including Black Hills Power, Inc. (“Black Hills
13 Power”).

14 **Q. PLEASE DESCRIBE YOUR EDUCATION AND PROFESSIONAL**
15 **BACKGROUND.**

16 A. I received a Bachelor of Science degree with honors in Mechanical Engineering from the
17 South Dakota School of Mines and Technology in 1987. I have 37 years of experience
18 working in the mining and electrical power industry. I have nuclear, fossil fuel, and
19 renewable power generation operating experience and have led the construction of over 1
20 gigawatt of power plants. I have been and continue to be involved in the development,
21 engineering, construction, and commissioning of the Lange II Project as well as the other
22 power plants owned and operated by subsidiaries of BHC.

1 **II. PURPOSE OF TESTIMONY**

2 **Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?**

3 A. The purpose of my testimony is to discuss the development, construction, and operation
4 of the Lange II Project and to discuss the plans to retire the Ben French generating units.
5 I will provide a detailed overview of the Lange II Project including the project budget,
6 the construction schedule, and the operation of the facility when in-service.

7 **Q. PLEASE IDENTIFY THE ATTACHMENTS YOU ARE SPONSORING.**

8 A. I am sponsoring the following attachments:

9	Attachment MLL-1	RICE Attributes
10	Attachment MLL-2	RICE Temperature Derate Performance
11	Attachment MLL-3	RICE Elevation Performance
12	Attachment MLL-4	RICE Fuel Quality Performance
13	Attachment MLL-5	RICE Efficiency Performance
14	Attachment MLL-6	West Peak Energy Study
15	Attachment MLL-7	Decommissioning Estimate
16	Attachment MLL-8	O&M Budget

17 **III. LANGE II PROJECT DETAILED OVERVIEW**

18 **Q. PLEASE PROVIDE A DETAILED OVERVIEW OF THE LANGE II PROJECT.**

19 A. The Lange II Project is a generating plant that will produce a total of 97.4 MW net
20 capacity (99.6 MW of name-plate capacity) to serve Black Hills Power customers in
21 South Dakota, Wyoming, and Montana. As discussed in detail in the testimony of Eric

1 Egge¹ the Lange II Project was selected as the least cost resource to address an identified
2 capacity need.

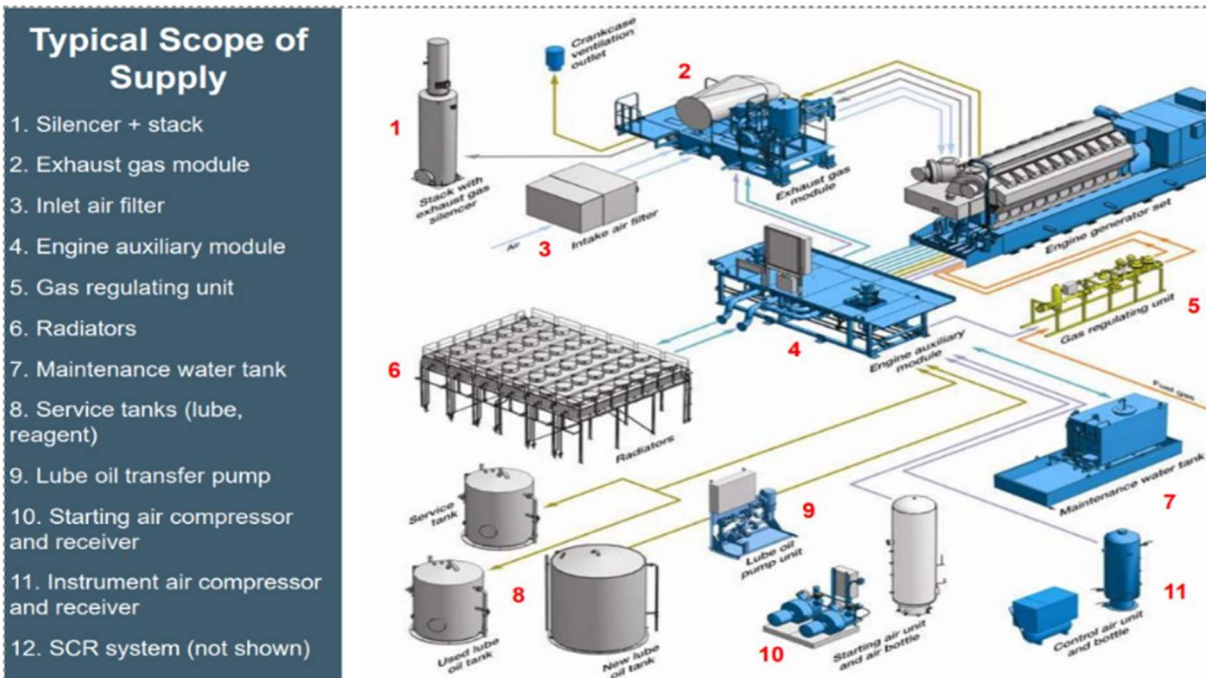
3 The Lange II Project will be located on the northwest side of Rapid City, South
4 Dakota on 160 acres of land owned by Black Hills Power. The Lange II Project is
5 comprised of six 16.6 MW dual-fuel (natural gas and diesel) reciprocating internal
6 combustion engines (“RICE”) and associated balance of plant process equipment.

7 **Q. PLEASE DESCRIBE THE MAJOR COMPONENTS OF THE LANGE II**
8 **PROJECT.**

9 A. The itemized major components for the Lange II Project include the RICE engine
10 package with associated balance of plant equipment to support the operation of the
11 engines, electrical transformers, engine hall building, administration control building,
12 warehouse, diesel storage tanks, dual purpose service water storage tank, black start
13 generator, natural gas interconnection piping, and electrical interconnection generator tie
14 line connecting to the existing Lange Substation. The RICE engine package and
15 associated balance of plant equipment for the engine package are depicted in the
16 illustration below:²

¹ Exhibit 2 to the Application.

² See also, Exhibit 8 to the Application, RICE Equipment and Services Contract and Exhibit 4 to the Application – General Arrangement Drawing.



The RICE engine performance and name plate rating was determined as part of the RICE detail design, which required a site-specific natural gas fuel quality specification analysis. The Lange II Project site-specific fuel quality specification was based on five years of historical natural gas data provided from the current natural gas supplier to the existing Lange unit, WBI Energy. Based on the WBI Energy natural gas data and the associated chemical composition of the natural gas, the RICE unit name plate of 16.6 MW per engine rating is derived³ and the engine efficiency is determined.⁴

Q. PLEASE DESCRIBE THE TECHNICAL SPECIFICATIONS OF THE RICE UNITS.

A. The RICE units will have fuel resiliency (natural gas and diesel), low water use at less than one gallon per minute per megawatt, minimum temperature derate,⁵ and minimum

³ See Attachment MLL-4 -RICE Fuel Quality Performance.

⁴ See Attachment MLL-5 - RICE Efficiency Performance.

⁵ See Attachment MLL- 2 - RICE Temperature Derate Performance.

altitude derate.⁶ Further, the RICE units are modular and have a low natural gas pressure design which eliminates the need to add gas compressors. The RICE units are fast starting and will ramp from minimum and to maximum output in one minute with no starting penalty for maintenance, which enhances dispatchability and regulation at no increased maintenance costs. These fast ramp rates make RICE units ideal for regulating the intermittency of renewable energy and to support other ancillary services like voltage regulation, frequency response, operating reserves, and the ability to start without being connected to the power grid known as black-start capability.⁷

Q. PLEASE DESCRIBE THE AIR QUALITY CONTROLS TO BE INSTALLED ON THE LANGE II PROJECT?

A. Lange II will have two air quality control systems. The first system is a Selective Catalytic Reduction (“SCR”) system which uses catalyst and ammonia to reduce nitric oxide (“NOX”) emissions. The second system is an oxidation catalyst system which uses a catalyst to reduce carbon monoxide (“CO”) and volatile organic compounds (“VOC’s”) emissions.

Q. PLEASE DESCRIBE HOW THESE SPECIFIC UNITS WERE SELECTED.

A. As discussed in Eric Egge’s testimony,⁸ the capacity expansion model simulated generation capacity investments from candidate resource options including RICE as one resource option. The modeling then determined the necessary resources to effectively meet customer needs and selected RICE. Black Hills Power then retained Black and Veatch to complete a competitive solicitation of RICE manufacturers evaluating

⁶ See Attachment MLL-3 - RICE Elevation Performance.

⁷ See Attachment MLL-1 – RICE Attributes.

⁸ Exhibit 2 to the Application.

1 financial, commercial and technical capability. From the evaluation, Wartsila engines
2 were recommended. In addition to financial and lead time considerations, technical
3 performance, and domestic market presence was considered.

4 **IV. RELATED FACILITIES**

5 **Q. PLEASE DESCRIBE THE ELECTRIC, FUEL, AND WATER**
6 **INTERCONNECTION FACILITIES REQUIRED FOR THE LANGE II**
7 **PROJECT.**

8 A. The Lange II Project will utilize a natural gas supply pipeline interconnected to a 10-inch
9 gas line that currently supplies gas to the existing Lange combustion turbine, adjacent to
10 the Lange II site, through an approximately 200-foot pipeline tie-in.⁹

11 The Lange II Project will be electrically interconnected from the Lange II
12 generator step-up transformer (“GSU”) to the adjacent Lange Substation.¹⁰ The GSU
13 transformer high side bushings are rated at the substation voltage which is 230 kilovolts.
14 From the high side GSU transformer bushings, a ½ mile 3 phase-230 KV transmission tie
15 line will run west and then south around the north side of the existing Lange substation
16 where it will enter the substation at the point of interconnect at the exiting Lange 230 kV
17 substation.

18 The Lange II Project has adequate water supply sourced from a short piping tie-
19 line interconnect to an existing onsite water well, which supplies the existing Lange
20 combustion turbine.

⁹ The existing Lange combustion turbine (“CT”) is a 40 MW GE LM6000 simple-cycle gas-fired CT wholly owned by Black Hills Power. This facility is located in Rapid City, SD and was commissioned on March 10, 2002.

¹⁰ See Exhibit 4 to the Application – General Arrangement Drawing.

Q. PLEASE PROVIDE A DETAILED DESCRIPTION OF THE FUEL STRATEGY FOR THE LANGE II PROJECT.

A. The fuel supply for the Lange II Project will consist of natural gas and diesel fuel. Black Hills Power evaluated three alternatives and determined the best fuel supply was the dual-fuel option. The North America Electric Reliability Corporation (“NERC”), in its annual long term reliability assessment, indicated a concern of elevated prolonged severe weather conditions that could disrupt the supply of natural gas to generating resources and recommended dual-fuel capability to mitigate this risk. In its evaluation, Black Hills Power considered the capital costs of two options and the cost of procuring firm pipeline capacity as a third option. Black Hills Power considered 1) firm natural gas pipeline capacity; 2) dual-fuel with natural gas and diesel; and 3) liquified natural gas (“LNG”) on site storage. Based on the three options, dual-fuel with natural gas and diesel was determined to be the least cost solution, while also mitigating risk through fuel diversity. The table below is a summary comparing the capital investment and firm transport cost analysis completed for the three options:

Firm Fuel Supply Options/Cost					
	Estimated \$/year		Low \$/year		High \$/year
Firm Transport	\$	3,796,000	\$	3,796,000	\$ 6,570,000
Dual Fuel Gas/Diesel all 6 engines	\$	2,968,758	\$	2,053,373	\$ 4,055,778
LNG On site Storage	\$	10,920,000	\$	8,160,000	\$ 15,360,000

Q. PLEASE DESCRIBE THE OPERATIONAL DETAILS OF THE DUAL-FUEL OPTION.

A. As mentioned above, the natural gas supply will be interconnected with approximately 200 feet of natural gas pipeline. This interconnection feed will be located on the east side of Lange II connecting to an existing 10-inch gas line that provides natural gas fuel to the

1 existing Lange combustion turbine, also owned by Black Hills Power. The diesel fuel
2 will be stored in two redundant 300,000-gallon storage tanks. The diesel tanks were
3 sized based on analysis of a 5-year history of gas supply data and history of diesel
4 operation of the Ben French units. The two tanks will provide sufficient fuel to operate
5 Lange II 24 hours a day for four days. Additionally, Rapid City suppliers have access to
6 additional local diesel fuel that could be delivered to the Lange II site in an emergency.

7 **V. LANGE II CONSTRUCTION COSTS**

8 **Q. WHAT IS THE COST ESTIMATE OF THE LANGE II PROJECT?**

9 A. The estimated total cost of construction of the Lange II Project is \$280 million. A
10 detailed cost estimate is included as Confidential Exhibit 9 to the Application.

11 **Q. ARE THERE ANY SPARE PARTS INCLUDED IN BLACK HILLS POWER'S**
12 **COST ESTIMATE?**

13 A. Yes. Spare parts are included, consistent with prudent utility practice and manufacturer
14 recommendations, to minimize lost production of Lange II. The RICE manufacturer
15 recommends stocking spare parts in two general categories: safety spare parts and swing
16 set (or emergency) spare parts. The safety spare parts are estimated at \$2 million and
17 include items for continued routine maintenance to ensure reliability. The swing set (or
18 emergency) spare parts are estimated at \$4 million and include cylinder heads, piston
19 liners, injection pumps and valves required for major RICE unit maintenance. In addition
20 to the RICE unit spare parts, there will be additional balance of plant spare parts
21 estimated at \$1.5 million.

22 Black Hills Power will also secure two spare emergency transformers due to
23 current long lead times. One is the GSU transformer, and one is the station service

transformer. The total cost of the two spare emergency transformers is estimated at \$6 million.

Q. PLEASE DESCRIBE THE CONTRACT AND EQUIPMENT PROCUREMENT PROCESS.

A. The Lange II Project procurement involves securing key contracts early to establish a reliable schedule and reduce price risk and then securing fixed priced contracts for the remainder of the project. Black Hills Power secures fixed priced contracts for direct costs including process equipment and construction contracts through a competitive bid process with qualified bidders. This process begins with prioritized procurement based on long lead time critical process equipment. Due to the current state of the supply chain, we have experienced extremely long lead times on certain process equipment. Locking in the long lead time equipment ensures that the construction process can proceed in a timely manner with reasonably priced equipment. After these key contracts are secured, the remainder of the project contracts are secured through competitively bid fixed price contracts.

Q PLEASE EXPLAIN THE COMPETITIVE BID PROCESS

A. Black Hills Power hired Black & Veatch as the engineer of record for the Lange II Project. Black & Veatch prepared the specifications for the plant and following review and approval by Black Hills Power, Black & Veatch prepared requests for proposals that were submitted to various potential and qualified vendors. Black & Veatch reviewed the bid proposals submitted by the vendors and made recommendations which were reviewed, and successful bids were accepted by Black Hills Power.

1 **VI. LANGE II PROJECT STATUS**

2 **Q. PLEASE PROVIDE A SUMMARY OF THE PROJECT SCHEDULE FOR THE**
3 **LANGE II PROJECT.**

4 A. To meet the required need for generation resources discussed in Eric Egge's testimony,¹¹
5 Black Hills Power has completed preliminary engineering and secured contracts for
6 critical long lead time equipment. Black Hills Power will begin construction of
7 foundations and the prefabricated engine hall building to install the RICE units upon
8 approval of the CPCN.

Task/Topic	Expected Completion Date
Land/Easement Acquisition	Complete
Environmental Permits	Q3 2025
Construction Commencement	September 1, 2025
In-Service Date	September 1, 2026

9
10 **VII. LANGE II OPERATIONS**

11 **Q. PLEASE DESCRIBE LANGE II PROJECT OPERATIONS.**

12 A. Lange II will be dispatched centrally from our generation dispatch center located at our
13 corporate office in Rapid City, South Dakota. Lange II will be maintained with five full
14 time employees permanently assigned to the two Lange units (the existing Lange 40 MW
15 gas fired turbine and Lange II 97.4 MW net capacity (99.6 MW name-plate capacity)
16 RICE units. The site employees and site manager will be in Rapid City, South Dakota at
17 the Lange II site.

18
19

¹¹ Exhibit 2 to the Application.

1 **Q. PLEASE PROVIDE THE ESTIMATED ANNUAL OPERATING AND**
2 **MAINTENANCE COSTS FORECASTED FOR THE LANGE II PROJECT.**

3 A. Black Hills Power estimates its total annual operation and maintenance (“O&M”) costs
4 for the Lange II Project, exclusive of fuel, to be approximately \$4.3 million.¹² This
5 forecast assumes recommended preventative and major maintenance with the addition
6 of technical support from Wartsila.

7 **Q. WHAT CATEGORY OF COSTS ARE INCLUDED IN THE FORECASTED O&M**
8 **COSTS STATED ABOVE?**

9 A. The cost categories include labor, fixed O&M, variable O&M, and service company
10 costs. The labor costs include supervision, operation and maintenance. The fixed and
11 variable operations costs include the required annual preventative and major
12 maintenance, consumables, and operating reagents for emission compliance.

13 **Q. WILL ANY OF THE ONGOING O&M COSTS MENTIONED ABOVE BE**
14 **SHARED WITH THE EXISTING LANGE COMBUSTION TURBINE?**

15 A. No. The ongoing costs in the Lange II O&M already consider cost allocations for shared
16 operations and maintenance labor with other units.

17 **Q. WHAT IS THE BASIS FOR THE ESTIMATED O&M COSTS FORECASTED**
18 **FOR THE LANGE II PROJECT?**

19 A. The O&M costs are based on experience, site visits, and proposals from the RICE unit
20 manufacturer. The estimate includes fixed and variable labor and equipment
21 manufactures technical support. The fixed and on-site labor are based on staffing levels
22 determined from site visits and from manufacturer recommended preventative and major

¹² See MLL-8 – O&M Budget.

1 maintenance schedules. The variable operating costs are based on operating consumable
2 estimates.

3 **VIII. RETIREMENT OF THE BEN FRENCH GENERATING UNITS**

4 **Q. PLEASE DESCRIBE THE RETIREMENT OF THE BEN FRENCH UNITS.**

5 A. The Ben French generating units are planned to be retired in 2027. The Ben French units
6 consist of four dual-fuel (natural gas/diesel) generating units with name plate ratings of
7 25 MW each and five diesel generating units with name plate ratings of 2 MW each.
8 These units have been in service for 50 to 60 years and are the oldest units in the Black
9 Hills Power generating fleet. The Ben French units are currently relied on for reliability
10 as the designated “black start” units. Black start units are expected to start up when the
11 entire grid is shutdown from an emergency black out event. The black start generating
12 unit is the first unit to start following a black out event. Once the black start unit is
13 started, electric load to customers is slowly restored to fully restore reliability to the
14 electric grid. Relying on 50- to 60-year-old generating units to support the critical
15 reliability function for black start is simply not advisable nor good business practice.

16 Further, these units are not currently supported by the original equipment
17 manufacturer. Maintenance services are completed by third parties without technical
18 support from the manufacturer. Parts that need replaced cannot be procured from the
19 manufacturer and therefore require reverse engineering from a non-manufacturer without
20 the quality requirements. Because the original equipment manufacturer no longer
21 supports these units it makes it nearly impossible to provide quality operation and
22 maintenance training. The Ben French units are critical for reliability and their

1 replacement with the proposed RICE units at Lange II will modernize this capability with
2 dual-fuel and black start.

3 **Q. PLEASE DESCRIBE THE STUDIES RELATED TO THE RETIREMENT OF**
4 **THE BEN FRENCH GENERATING UNITS.**

5 A. Black Hills Power retained West Peak Energy to conduct a study to evaluate the Ben
6 French unit retirement and placement.¹³ The study reviewed the option of sustaining
7 operation of the existing Ben French units or replacing the operation with the Lange II
8 Project. The summary recommendation by West Peak Energy is that Lange II provides
9 significant benefits to Black Hills Power as compared to continued operation of the
10 vintage Ben French units.

11 **Q. WITH THE PLANNED RETIREMENT OF BEN FRENCH UNITS, PLEASE**
12 **DESCRIBE THE FUTURE SPENDING STRATEGY FOR THESE UNITS.**

13 A. Because of the plan to retire the Ben French units in 2027, Black Hills Power will not
14 undertake any capital projects that had been planned post 2024. The capital reductions
15 are not expected to have operational impacts for continued operations through 2027 and
16 include items such as relay upgrades, new control system upgrades, new diesel fuel
17 loading station, battery charger/battery upgrades, and other miscellaneous plant
18 improvements. With Lange II planned to be in service in 2026 and with Lange II
19 essentially replacing the need for the Ben French units retiring in 2027, the sequential
20 timing of the retirement and new generation in service also mitigates any impacts from
21 the capital reduction.

¹³ See Attachment MLL-6 – West Peak Energy Study.

1 Operating the Ben French units through 2027 versus beyond 2027 optimizes the
2 costs to customers by reducing the need for future capital and major maintenance. By
3 operating the Ben French units beyond 2027, the West Peak Energy Study estimated that
4 Black Hills Power would need an additional \$54.1 million of capital to ensure reliability.
5 The capital investment required beyond 2027 includes investment for the gas turbines and
6 electrical equipment. For the gas turbines, significant turbine upgrades would be required
7 for gas path components, exhaust stacks, air inlet coolers, and the gas turbine rotor and
8 compressor. For the electrical equipment, the generators and transformers would need to
9 be rewound. New generator breakers and electrical switchgear would need to be
10 upgraded. All the safety protective relaying would need upgraded and fuel system
11 upgrades would also be required.

12 Staffing is also optimized with the timing of Lange II coming online in 2026 as
13 the existing staff that currently operates the Ben French units can be utilized to support
14 the Lange II operations.

15 **Q. PLEASE DESCRIBE THE STEPS BLACK HILLS POWER HAS CONSIDERED**
16 **TO PREPARE FOR THE RETIREMENT OF THE BEN FRENCH GENERATING**
17 **UNITS.**

18 A. Black Hills Power has considered three key steps: 1) managing customer cost impacts by
19 mitigating operating and capital cost prior to retirement; 2) timing the retirement of the
20 asset to mitigate the remaining book value impacts; and 3) following best practices to
21 prudently secure the least cost decommissioning plan.

22 Black Hills Power will follow best practices to secure a decommissioning
23 contractor. This process starts with completing a Phase I and Phase II Environmental

1 Assessment which will be completed in the second quarter of 2025. Black Hills Power
2 will then prepare a technical scope of work including any required environmental
3 remediation identified in the Phase I and II Environmental Assessments. The technical
4 scope will be used to seek competitive bids for the demolition. The bids will be firm
5 lump sum prices for the demolition all-inclusive of any environmental remediation.
6 Salvaging the units for re-use or full demolition of the units will be considered as part of
7 the bid solicitation process. Cost recovery for the total decommissioning impacts would
8 be considered during a future Black Hills Power rate case.

9 **Q. DOES BLACK HILLS POWER HAVE ESTIMATED COSTS FOR THE**
10 **RETIREMENT AND DECOMMISSIONING OF THE BEN FRENCH**
11 **GENERATING UNITS?**

12 A. Yes. Black Hills Power has solicited a budget proposal for the decommissioning of the
13 Ben French units from Independence Excavating Incorporated dated March 22, 2024.¹⁴
14 This budgetary proposal is a lump sum offer and contingent on the defined scope of work
15 set forth in the estimate. The estimate to decommission the four dual-fuel natural gas
16 turbines, the five diesel generators and two 1-million-gallon diesel tanks along with the
17 associated balance of plant equipment is estimated to be \$1.36 million in 2024 dollars.

18 **IX. CONCLUSION**

19 **Q. PLEASE EXPLAIN WHY RETIRING THE BEN FRENCH UNITS AND ADDING**
20 **THE LANGE II PROJECT TO BLACK HILLS POWER'S FLEET MITIGATES**
21 **RISK FOR CUSTOMERS.**

¹⁴ See Attachment MLL-7 – Decommissioning Estimate.

1 A. The Lange II Project will transform Black Hills Power from relying on the oldest
2 generating units (Ben French) in the fleet for black start and power grid resiliency to the
3 newest more efficient generating units for emergency events where the power grid fails.
4 Because parts supply and service are no longer available from the original equipment
5 manufacturer, replacing the 50- to 60-year-old aging units significantly reduces operating
6 risk and ensures reliability, which is only enhanced by the dual fuel capability of the
7 Lange II Project.

8 **Q. PLEASE EXPLAIN THE VALUE LANGE II PROVIDES BLACK HILLS**
9 **POWER'S GENERATION FLEET?**

10 A. The Lange II Project will be integrated into the existing Black Hills Power generating
11 fleet providing faster responding and more efficient dispatchable generation to the fleet.
12 The exiting fleet consists of 32.5 MWs of wind turbines, 230.8 MWs of coal generation,
13 180 MWs of natural gas fired simple cycle generation, 58 MWs of combined cycle
14 generation and 10 MWs of diesel generation. The RICE units will provide 97.4 MWs of
15 additional net generation (99.6 MWs of name-plate). The Lange II RICE units will be
16 Black Hills Power's most fuel-efficient simple cycle natural gas units, most dispatchable
17 with fastest ramping capability, most reliable and with redundant dual-fuel supply
18 provides resiliency in an emergency event with black start capability and the flexibility to
19 use any of the RICE units as black start units to restore the power grid.

20 **Q. WHAT IS BLACK HILLS POWER REQUESTING FROM THE COMMISSION**
21 **IN THIS DOCKET?**

22 A. Black Hills is requesting expedited approval of a CPCN for the Lange II Project to begin
23 construction no later than by September 1, 2025.

1 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

2 A. Yes.

STATE OF SOUTH DAKOTA)
) SS
COUNTY OF PENNINGTON)

I, Mark Lux, being first duly sworn on oath, depose and state that I am the witness identified in the foregoing prepared testimony, and I am familiar with its contents, and that the facts set forth are true to the best of my knowledge, information and belief.



Mark Lux

Subscribed and sworn to before me this 24th day of March, 2025.



Notary Public

My Commission Expires:

My commission expires June 22, 2029