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**BEFORE THE  
PUBLIC SERVICE COMMISSION OF WISCONSIN**

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4 Application for Grant County Solar, LLC to Construct a New  
5 Solar Electric Generation Facility located near Potosi and Docket No. 9804-CE-100  
6 Harrison Townships, in Grant County, Wisconsin

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**REBUTTAL TESTIMONY OF DAVID G. LOOMIS**

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13 **Q. Are you the same David G. Loomis who filed direct testimony in this case?**

14 A. Yes.

15 **Q. What is the purpose of your rebuttal testimony?**

16 A. I am responding to certain portions of the direct testimony filed by Grant County  
17 Intervenors (“GCI”) witnesses Ross Reynolds, Daniel Cray, Preston and Jennifer Adrian,  
18 and Kelsey and Travis Wagner with respect to the economic impacts of the Project on the  
19 local economy and agricultural businesses.

20 **Q. GCI witnesses express concern that the removal of the Project Site from agricultural**  
21 **production for the life of the Project will have a negative impact on the local economy.**  
22 **(GCI-Direct-Wagner-4; GCI-Direct-Reynolds-3; GCI-Direct-Cray-7-9). Do you**  
23 **agree?**

24 A. No. As set forth in Ex.-Grant County Solar-Loomis-1: Economic Impact Analysis of the  
25 Grant County Solar, LLC Solar Generation Project (PSC REF#: 399428) and discussed in  
26 detail in my direct testimony, the Project will positively impact the local and state economy  
27 in at least four areas: jobs, earnings, output, and tax revenue.

1 **Q. Will the removal of the Project Site from agricultural production during the life of**  
2 **the Project significantly impact the revenues produced by local farming?**

3 A. No. Any potential loss of farm revenue and individual income would only be incurred by  
4 participating landowners. The participating landowners are fully compensated for any such  
5 potential losses by their lease payments.

6 **Q. GCI Witnesses Kelsey and Travis Wagner have voiced concern about the “local**  
7 **economic impact of removing 1,403 or more acres of farm ground from active**  
8 **production by covering those acres with over 700,000 solar panels for over thirty**  
9 **years.” (GCI-Direct- Wagner-4.) Do you agree with this concern?**

10 A. No. As noted in Ex.-Grant County Solar-Loomis-1, the Project Site represents less than  
11 one percent (0.23%) of the acres used for farming in Grant County. This small reduction  
12 will have a de minimis impact on the local economy, including agricultural business, and  
13 farm and ag business tax revenue.

14 **Q. GCI Witness Reynolds states that the Project “is having negative effects on our**  
15 **business as it aims to take ag land and turn it to a nearly permanent commercial solar**  
16 **field.” (GCI-Direct-Reynolds-3). Do you agree?**

17 A. No. First, beyond his assertion of harm, GCI Witness Reynolds provides no evidence to  
18 support his claim. As noted above, the Project Site is less than one percent of the acres  
19 used for farming in Grant County. As such, the overall loss of farm and agricultural land  
20 is minimal. The agricultural supply chain will not see a significant loss of seed sales,  
21 repairs, contracting work, etc. as a result of this Project. Moreover, local businesses will  
22 experience increases in revenue from household spending as a result of jobs being created  
23 or supported by the Project.

1 Q. **GCI Witnesses Preston and Jennifer Adrian have expressed concern about the long-**  
2 **term impact of the Project on agricultural land rents in the area. (GCI-Direct-**  
3 **Adrian-2.) Will the Project have a negative impact on agricultural land rents in the**  
4 **area?**

5 A. No. First, rental rates for agricultural land are predominantly determined by the expected  
6 revenue resulting from the yield of a specific field and the cost of inputs (i.e., seed,  
7 machinery, etc.) – not availability of land. Moreover, the revenue from yield is further  
8 determined by the market price of crops produced (e.g., corn and soybeans) nationwide,  
9 and not just crops produced in Grant County. Nevertheless, while I am not aware of the  
10 percentage of the Project Site that currently constitutes leased land, as I testified above and  
11 noted on page 19 of Ex.-Grant County Solar-Loomis-1, the approximately 1,403 acre  
12 Project Site represents less than one percent (0.23%) of the acres used for farming in Grant  
13 County. Thus, the Project will have a minimal impact on the overall agricultural land in  
14 Grant County.

15 Q. **In your professional opinion, will the construction and operation of the Project have**  
16 **a positive impact on the economy of Grant County and the State of Wisconsin?**

17 A. Yes. As stated in my Direct Testimony, based on my Economic Impact Analysis, the Grant  
18 County Solar Project, both during construction and while in operation, will have a positive  
19 impact on the economy of Grant County, the Town of Potosi, and the State of Wisconsin  
20 in terms of jobs, earnings, output, and tax revenue.

21 Q. **Does this conclude your prefiled rebuttal testimony?**

22 A. Yes, it does.