

1 **BEFORE THE**
2 **PUBLIC SERVICE COMMISSION OF WISCONSIN**

3
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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9 **SURREBUTTAL TESTIMONY OF DAVID G. LOOMIS**

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

15 A. Yes.

16 **Q. What is the purpose of your surrebuttal testimony?**

17 A. I am responding to certain portions of the rebuttal testimony filed by Grant County
18 Intervenors (“GCI”) witnesses Daniel and Connie Cray, and Brianna Eisentrout Frear and
19 Henry Frear with respect to the economic impacts of the Project on the local economy and
20 agricultural businesses.

21 **Q. Do you sponsor any exhibits with your surrebuttal testimony?**

22 A. Yes. I am sponsoring the following exhibit:

23 Ex.-Grant County Solar-Loomis-2: Project Parcels - Grant County 2020 Taxes.

24 **Q. GCI Witnesses Daniel and Connie Cray express concern that the Project will result**
25 **in the loss of jobs. (GCI-Rebuttal-Cray-9). How do you respond?**

26 A. I disagree. As set forth in Ex.-Grant County Solar-Loomis-1: Economic Impact Analysis
27 of the Grant County Solar, LLC Solar Generation Project (PSC REF#: 399428) and
28 discussed in detail in my direct testimony, (Direct-Grant County Solar-Loomis-4), the

1 Project will create or support the following jobs during the construction phase and the long-
2 term operational life of the Project:

- 3 • 152 local jobs during construction for Grant County;
- 4 • 533 jobs during construction for the State of Wisconsin;¹
- 5 • Over 11 new long-term jobs for Grant County; and
- 6 • Approximately 15 new long-term jobs for the State of Wisconsin.

7 **Q. On page 3 of their rebuttal testimony, GCI witnesses Mr. and Mrs. Frear, without**
8 **providing any specific reference, assert that some of your testimony is “confusing”**
9 **and that term “local” as used in your Economic Impact Analysis is undefined.**
10 **(Rebuttal-GCI-Frear-3). What is the definition of “local” as used in the Economic**
11 **Impact Analysis?**

12 A. “Local” as used in my testimony and in Ex.-Grant County Solar-Loomis-1: Economic
13 Impact Analysis of the Grant County Solar, LLC Solar Generation Project, refers to the
14 geographic territory of interest. For example, local jobs in the Grant County analysis refers
15 to jobs created or supported for workers within Grant County. Local jobs in the State of
16 Wisconsin are jobs created or supported for workers within the State of Wisconsin. Other
17 jobs will be created in other states but those are not local and are not included in the
18 analysis.

19 **Q. Mr. and Mrs. Cray also express concern that the removal of the Project Site from**
20 **agricultural production will result in lost income to businesses. (GCI-Rebuttal-Cray-**
21 **9). Will the removal of the Project Site from agricultural production during the life**

¹ The projected local and state job totals include the 250-350 construction jobs estimated for the Project.

1 **of the Project significantly impact the revenues produced by local farming and**
2 **associated businesses?**

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 As noted in Ex.-Grant County Solar-Loomis-1 and discussed in my rebuttal
7 testimony (Rebuttal-Grant County Solar-Loomis-2), the Project Site represents less than
8 one percent (0.23%) of the acres used for farming in Grant County. This small reduction
9 will have a de minimis impact on the local economy, including agricultural business, and
10 farm and ag business tax revenue. As such, the overall loss of farm and agricultural land
11 is minimal. The agricultural supply chain will not see a significant loss of seed sales,
12 repairs, contracting work, etc. as a result of the Project.

13 Moreover, local businesses will experience increases in revenue from household
14 spending as a result of jobs being created or supported by the Project. For example, the
15 jobs identified above will result in the following earnings for those employees, to the
16 benefit of the local and state economy:

- 17 • Over \$7.1 million in new local earnings during construction for Grant County;
- 18 • Over \$32.4 million in new local earnings during construction for the State of
19 Wisconsin;
- 20 • Over \$485,000 in new local long-term earnings for Grant County annually; and
- 21 • Approximately \$1 million in new local long-term earnings for the State of
22 Wisconsin annually.

1 **Q. On page 10 of their rebuttal testimony, Mr. and Mrs. Cray question whether local or**
2 **state costs were considered in the Economic Impact Analysis (GCI-Rebuttal-Cray-**
3 **10). Please explain your response.**

4 A. Potential local or state governmental costs are not included. As discussed in my direct
5 testimony, I utilized the National Renewable Energy Laboratory’s latest Jobs and
6 Economic Development Impacts (“JEDI”) PV Model to analyze the economic impacts of
7 the Project. (Direct-Grant County Solar-Loomis-_3). The JEDI PV Model is a widely
8 recognized methodology used in numerous U.S. studies that have been published in peer-
9 reviewed academic journals. It is an input-output model that measures the spending
10 patterns and location-specific economic structures that reflect expenditures supporting
11 varying levels of employment, income, and output. The JEDI model inputs include private
12 investments and on-going operating costs incurred by Grant County Solar. Moreover, as
13 discussed in my direct testimony, the Project is expected to have a significant positive
14 impact on Grant County and Town of Potosi tax revenues. (Direct-Grant County Solar-
15 Loomis-5).

16 **Q. What is the Project’s impact on tax revenue for the Town and County?**

17 A. Solar PV projects are exempt from local property taxes in Wisconsin. However, the county
18 and township in which the projects are located receive increased revenue through the
19 shared revenue utility aid fund. This funding is intended to reimburse the communities for
20 the lost property tax revenue due to the tax exemption. I have concluded that under the
21 Wisconsin Shared Utility Aid Formula, Grant County is expected to receive approximately
22 \$466,667 and the Town of Potosi is expected to receive approximately \$333,334 on an
23 annual basis as a direct result of the construction of the Project. It is my understanding,

1 that the revenues provided pursuant to the Wisconsin Shared Utility Aid Formula continue
2 through decommissioning of the Project, at which time they decrease 20% per year for five
3 years (*see* Wis. Stat. § 79.04).

4 **Q. Is the projected tax revenue greater than the amount currently collected from the**
5 **parcels leased for the Project?**

6 A. I anticipate that the projected tax revenue will exceed current tax revenue generated from
7 the same parcels. For example, pursuant to a search of Grant County Land records, the
8 parcels leased for the Project were collectively assessed approximately \$39,500 in 2020 –
9 over \$400,000 less than Grant County is projected to receive annually under the Wisconsin
10 Shared Utility Aid Formula. (*See* Ex.-Grant County Solar-Loomis-2). Thus, in my
11 opinion, there will be a net increase in direct revenue to the Town and the County as a
12 result of the construction of the Project.

13 **Q. GCI witnesses Brianna Eisentrout Frear and Henry Frear assert that the use of the**
14 **voluntarily leased parcels for the Project will result in “extreme-hardship” on**
15 **“farmers currently leasing land to farm.” (Rebuttal-GCI-Frear-4). Do you agree?**

16 A. No. The GCI witnesses present no evidence demonstrating that the loss of farmland is so
17 significant that replacement farmland cannot be found in the market. As discussed above,
18 the Project Site represents less than one percent (0.23%) of the acres used for farming in
19 Grant County. Thus, I anticipate that farmers who lease their land to the Project would
20 have the opportunity to lease or buy other land in Grant County to farm. As the
21 Commission held in the Badger Hollow Solar Project Proceeding, it is not “reasonable to
22 conclude that the voluntary leasing by the owners of such property to [a solar generation
23 developer] constitutes an individual hardship.” *See*, Docket 9697-CE-100, *Application for*

1 *a Certificate of Public Convenience and Necessity of Badger Hollow Solar Farm, LLC to*
2 *Construct a Solar Electric Generation Facility, to be Located in Iowa County, Wisconsin,*
3 *Final Decision, issued on April 18, 2019 (PSC REF#: 364425), p. 17.*

4 **Q. Does this conclude your prefiled surrebuttal testimony?**

5 A. Yes, it does.