

Exhibit No.: \_\_\_\_\_

**Issue: Public Interest, Impacts on Crop Dusting  
(Aerial Applicator)**

**Witness: Noel Palmer**

**Type of Exhibit: Rebuttal Testimony**

**Sponsoring Party: Neighbors United  
Against Ameren's Power Line**

**Case No.: EA-2015-0146**

**Date Testimony Prepared: October 21, 2015**

**MISSOURI PUBLIC SERVICE COMMISSION**

**CASE NO. EA-2015-0146**

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Date 1/25/16 Reporter JK  
File No. ER-2015-0146

**REBUTTAL TESTIMONY**

**OF**

**NOEL PALMER**

**ON BEHALF OF**

**NEIGHBORS UNITED AGAINST AMEREN'S POWER LINE**

OCTOBER 21, 2015



1           **Q:    Please state your name.**

2           A:    Noel Palmer.

3           **Q:    Where do you reside?**

4           A:    I live in Knox County, Missouri.

5           **Q:    By whom are you employed?**

6           A:    I own my own aerial crop dusting business, Palmer Ag Air, located at 66524 State  
7 Highway 15, Novelty, MO.

8           **Q:    Please give a brief description of the nature of your business.**

9           A:    I apply herbicides, fungicides, and insecticides to agricultural property in  
10 Northeast and Central Missouri. For the most part, the crops I spray are corn, soybeans, and  
11 wheat, and I also fly on cover crops.

12          **Q:    Before getting into the aerial application business, what experience did you  
13 have flying airplanes?**

14          A:    I received my solo certificate in 1973. Afterwards I obtained a private license,  
15 commercial license, then in the fall of 1975 attended an ag pilot training school and crop dusting  
16 training in York, Nebraska.

17          **Q:    How long have you been in business?**

18          A:    I have been in the business continuously for the past 39 years.

19          **Q:    How long have you owned your own spraying business?**

20          A:    Since 1976, when I started the business.

21          **Q:    What counties in Missouri do you normally work in?**

22          A:    In Missouri, I generally cover Shelby and Knox Counties, which are located in the  
23 Northeast part of the state.

1           **Q:    Do you have any experience in spraying where an electric transmission line is**  
2 **located?**

3           A:    In the 39 years of flying my home area, central Missouri, all surrounding states  
4 plus Mississippi and Minnesota, I've had a lot of experience working around all types of power  
5 lines. Many fields that I spray have some sort of electric line whether a distribution or  
6 transmission line. The transmission lines already in this area that I regularly spray around are  
7 161,000 and 69,000 volts.

8           **Q:    Please describe the problems that high-voltage transmission lines and**  
9 **structures like those proposed in this case cause in your crop dusting business.**

10          A:    First and foremost, I must avoid any contact with the line and/or structure. I stay 2  
11 passes (100-120 ft) away from the closest conductor when flying parallel to the electric  
12 transmission lines. This cuts into the total number of acres that could be treated due to the line,  
13 which would in turn cut into the acres being paid to spray. Simply put, I cannot and do not finish  
14 fields with the big transmission lines and this is why—unlike distribution lines that run along  
15 field borders and roads in a square and organized pattern, transmission lines simply cut across  
16 country in a straight line cutting fields in odd angle patterns. Flying under these lines with an 8-  
17 10 foot tall crop, a 12-foot tall aircraft with a safe crop clearance is impossible especially with  
18 the heat of summer, growing season and tremendous line sag. (Heat sag that will also affect  
19 modern day, tall ground equipment, sprayers with 80-120 foot spray booms used by custom  
20 applicators). Flying over the top of the line is just too high to control spray drift for insurance  
21 reasons and crop penetration performance. Some pesticides are quite corrosive even to stainless  
22 steel.

1 My experience spraying parallel with high voltage lines, such as our local 161,000 volt  
2 line of Northeast Power, is to allow about 2 spray swaths (width 100-120ft) distance to avoid  
3 GPS interference. My GPS is also tied into my chemical flow control output for proper rate  
4 output. I have experienced problems from time to time with interference on a long spray run next  
5 to these lines. I can only imagine that with a higher voltage line, there will be more problems. As  
6 stated earlier, much of these fields, if not the whole field, cannot safely and properly be sprayed  
7 by air.

8 **Q: How many acres of farmland would you not be able to treat along a**  
9 **transmission line?**

10 A: When using 150 feet in width that can't be treated, there is a loss of  
11 approximately 8-10 acres of farmland for every half mile along a transmission line.

12 **Q: In addition to the inability to spray certain areas, does the existence of the**  
13 **line and structures pose any safety risks to you as a pilot?**

14 A: Yes. There is always the risk of coming into contact with the transmission lines  
15 for various reasons, which could result in serious injuries or death.

16 **Q: You stated that the line will make it impossible to spray certain parts of the**  
17 **farmland near the line and structures. Could the farmland near the line and structures that**  
18 **cannot be treated by airplane be treated by crew on the ground?**

19 A: Sometimes by air is the only option. Ground crews can't apply treatment if the  
20 crops are too tall or the ground is too wet.

21 **Q: Would the existence of the proposed transmission line have any affect on**  
22 **your business and the business of other crop dusters across northern Missouri?**

1           A:     Yes. The acreage treated will not equal the acreage that would have been treated  
2 without the line because of the safety concerns addressed earlier. Being paid by the acre, the  
3 additional transmission line would not only have a financial impact on my business, but that of  
4 other crop dusters.

5           **Q:     Could the line also affect the crop yields of your clients?**

6           A:     Yes, very possible. If air application is the only option and part of the acreage can  
7 no longer be treated, then the yield of the crop could negatively be affected, which in turn could  
8 impact their business.

9           **Q:     Does that complete your testimony?**

10          A:     Yes. Thank you.

