

Exhibit No.: \_\_\_\_\_  
Issues: Adverse Effects of Route  
Witness: Edward & Patricia Redel  
Exhibit Type: Rebuttal Testimony  
Sponsoring Party: Intervenor CCOFFH

Case No. EO-2002-351  
Date: August 8, 2002

**MISSOURI PUBLIC SERVICE COMMISSION**

**CASE NO. EO-2002-351**

**REBUTTAL TESTIMONY  
OF  
EDWARD AND PATRICIA REDEL**

**ON BEHALF OF**

**INTERVENOR CONCERNED CITIZENS OF FAMILY  
FARMS AND HERITAGE**

**JEFFERSON CITY, MISSOURI**

**FILED<sup>2</sup>**  
AUG 08 2002  
Missouri Public  
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of the Application of Union )  
Electric Company for Permission and )  
Authority to Construct, Operate, Own, and )  
Maintain a 345 Kilovolt Transmission Line )  
in Maries, Osage, and Pulaski Counties, )  
Missouri ("Callaway-Franks Line"). )

Case No. EO-2002-351

AFFIDAVIT OF EDWARD AND PATRICIA REDEL

Edward and Patricia Redel, being first duly sworn, deposes and says that they (~~he/she~~)  
are ~~the~~ the witness who sponsors the accompanying testimony entitled "Rebuttal Testimony of  
Edward + Patricia Redel"; that said testimony was prepared by them (~~him/her~~) and/or under  
their (~~his/her~~) direction and supervision; that if inquiries were made as to the facts and  
conclusions in said testimony, they (he/she) would respond as therein set forth; and that the  
aforesaid testimony is true and correct to the best of their (his/her) knowledge.

Edward H. Redel  
Patricia A. Redel

State of Missouri  
County of Pulaski  
SUBSCRIBED and sworn to  
before me this 22 day of July, 2002.

Daniel Worsing  
Notary Public

My Commission Expires: 6-10-2003



**DIRECT TESTIMONY OF  
EDWARD AND PATRICIA REDEL**

1       Q.     Please state your name and residence address.

2       A.     Edward H. and Patricia A. Redel, 34102 Highway N, Vienna, Missouri 65582.

3       Q.     Are you a property owner in one of the three counties through which Union Electric  
4             Company is applying for permission and authority to construct, operate, own and maintain  
5             a 345 kilovolt transmission line?

6       A.     Yes, I am the owner of property which I am advised will be crossed by this new 345,000 volt  
7             transmission in Maries County.

8       Q.     What is the purpose of your testimony?

9       A.     I am providing this testimony in opposition to the application to construct this transmission  
10            line on the route requested by Ameren UE. The law requires that construction of this power  
11            line must be shown by Ameren UE to be necessary and convenient for the public service.  
12            Regardless of any necessity for a transmission line somewhere else, it is neither necessary  
13            nor convenient to the public to build the transmission line as proposed. The line can be  
14            constructed in other areas and its construction in the place and manner proposed will be  
15            destructive of family farms, family farm values, and does irreparable harm to the history and  
16            heritage of the local area and its communities.

17      Q.     Are you a member of the Intervenor group known as Concerned Citizens for Family Farms  
18             and Heritage?

19      A.     Yes, I am a member of that group and offer my testimony in support of its statement of  
20             purpose, which is attached to this testimony and incorporated.

1 Q. Have you as a property owner in the path of the proposed transmission line been contacted  
2 by Ameren UE for purpose of discussing where the line would go through your property and  
3 what alternatives, if any, might be available?

4 A. Edward has contacted Ameren UE about the proposal of the transmission line. I talked with  
5 Geoffrey Douglass on April 30, 2002. He suggested we talk with neighbors to change the  
6 proposal. I talked with Lawrence Wooten two days later. He made me so upset that I had  
7 to hang up on him. We received a letter from Jim Ketter from the Missouri Public Service  
8 Commission on June 22, 2002. He enclosed an alternative that UE has suggested as a  
9 possible alternative. No one from Ameren UE has ever been out here to look at our situation  
10 or to make any suggestions as to an alternative.

11 Q. How long have you owned the property in question?

12 A. We purchased the farm from my mother in July 1978.

13 Q. Could you describe the nature of the property and its past and current use?

14 A. We use this farm to raise beef cattle. We farm and put up hay for the cattle. Wood and logs  
15 have been harvested. Our family residence is on this property. The timber and lakes/ponds  
16 provide hunting and fishing for our family, grandkids and other relatives. This is a family  
17 farm.

18 Q. Is the current use of the property income producing to you?

19 A. Yes. We rely on the income from our beef cattle, hay, seed, timber, etc. for our livelihood.

20 Q. Is the proposed transmission line to run near or over any residence, structures, or  
21 improvements to your property?

22 A. The proposed transmission line will run very near our residence on the east side and will go

1 over the lake, which is real close to our residence.

2 Q. Do you already have any power lines over your property?

3 A. Yes. We have a 161,000 volt line to the west of our residence and farm buildings. It is  
4 owned by Central Electric. If the 345,000 volt proposed line is constructed in the east side  
5 of our residence and farm buildings, it will form a "wedge" and we will not have any room  
6 for expansion.

7 Q. Will the proposed power line, if built, affect the value of your land?

8 A. Yes. A power line of this size on my property will without question decrease the overall  
9 value of the remaining property. The power line itself, the large easement taken on a strip  
10 through that part of the property will impair present and future use of the entire parcel of  
11 property I own. The option of selling the property to get rid of the problems caused by the  
12 power line is unavailable. The power line will make the property virtually unsaleable,  
13 requiring that I simply live with Ameren UE's solution to a problem that I do not feel I even  
14 share with them. While I am unsure of the health affects of such a large power line so close  
15 to my own daily activities, it is ingrained in the popular mentality that such power lines  
16 constitute a health hazard, rendering unlikely any sale of my property at all. No one will buy  
17 this property with this 345,000 volt electric line through it.

18 Q. What other adverse impacts do you feel this line will create for yourself and others?

19 A. The attached statement of purpose for Concerned Citizens for Family Farms and Heritage  
20 sums up the overall bad impact. I and my neighbors live where we do by choice. We forego  
21 the luxuries of more urban living in exchange for the peace, quiet and more rustic lifestyle  
22 of the family farm and the small local community. Every reason and purpose that my

1 neighbors and I own property here for is drastically impaired or practically destroyed by the  
2 presence of this high voltage power line, and the constant commercial activity anticipated in  
3 building and maintaining it in the future.

4 Q. Do you know of any alternatives to the Ameren UE proposal which might change your  
5 opinion about this project?

6 A. The alternatives are all within the power of Ameren UE to implement, and I do believe an  
7 alternative exists. I believe Ameren should restudy the route and balance the interests of the  
8 community against their need to relieve overloading problems. There are other corridors  
9 equally available to Ameren to build this line which would be better able to bear the burden  
10 of the line's presence without destroying property values, life styles and family farms. My  
11 neighbors and I have no alternatives, and construction of the line as proposed will change our  
12 lives and circumstances forever. We will not be able to sell even though we may not wish  
13 to stay. Given our lack of options and alternatives, and the numerous alternatives available  
14 to Ameren UE to put this line almost anywhere it wants, it is my hope that the Public Service  
15 Commission will require Ameren UE to balance their mere commercial need against our vital  
16 need to preserve the family farm and our way of life.

17 Q. Have you had past experiences with power companies and their maintenance of their  
18 easement and right-of-way, and do you have concerns about this aspect of the new power  
19 line?

20 A. Yes. They don't control weeds and brush. They don't brush hog often enough and when  
21 they sprayed it was too late in the fall. They have traveled on private property (off the  
22 easement) and have left gates open or not properly secured. Several years ago when they cut

1 trees at the edge of the easement they shoved brush and trees off to the side. I told them not  
2 to block the roads when I came back, but they did block the roads with trees and brush  
3 anyway.

4 Q. Do you have any further testimony or observations to make for the Public Service  
5 Commission?

6 A. The proposed Ameren UE 345,000 volt transmission line that is to go on the east and  
7 northeast of our residence and farm buildings before joining and running along an existing  
8 161,000 volt transmission line is a major health concern of ours, as well as our families. The  
9 lines will wedge our home and business in a place where expansion is not possible. Also,  
10 there is the health risk of the livestock that we raise for our own consumption and for public  
11 consumption.

12 In 1978 when Associated Electric acquired the easement we were told that the line  
13 from Franks-Kingdom City would never go through. An alternative route from Springfield  
14 was acquired. Why should Ameren UE get the use of this power line and collect from it but  
15 the landowner would still have to pay taxes on the devalued property? We have never  
16 received any written responses from Ameren UE, including on how the easement would be  
17 cleared or taken care of. We don't like Ameren's policy of holding the landowner  
18 responsible for damages to utility property.

19 The appearance of our lands, the defacing of our property and the welfare of the trees  
20 and water are a big concern. The use of chemicals in and around our residence and lake and  
21 ponds and waterways are a big concern. Timber loss, harm to livestock and wildlife and  
22 erosion problems are also a major concern. The humming noise of the 161,000 volt

1 transmission line is annoying. What will the noise be with a 345,000 volt line?! What effect  
2 will the magnetic field of the new 345,000 volt line have on radio and RV reception, being  
3 so close to our residence? We have had a portable electric fence under the existing 161,000  
4 volt line and when it was not turned on you could still feel current in the electric fence line.

5 The business of the line going in has been very stressful and an aggravation in our  
6 lives and business.

7 Q. Does this conclude your Rebuttal Testimony?

8 A. Yes.



## **CONCERNED CITIZENS OF FAMILY FARMS AND HERITAGE**

### **STATEMENT OF PURPOSE**

Concerned Citizens of Family Farms and Heritage ("Concerned Citizens") is an unincorporated membership association of family farm owners, small property owners, small business owners and farm community residents formed to promote the interests of family farming, small town communities and rural life. Membership is open to all who share the desire to promote the interests of family farms and small communities in the rural areas of central Missouri, and those who wish to preserve the rural environment against the continuous encroachment of large commercial development and urban sprawl. Our primary concern is with preservation and protection of the family farm and its heritage in rural Missouri. Concerned Citizens oppose through all lawful means the encroachment on and destruction of family farms, which are the fundamental economic and cultural basis for the rural lifestyle. Concerned Citizens promotes all reasonable efforts to preserve and protect family farms and rural lifestyle, and vigorously opposes impairment or destruction of property which is used or useful for perpetuation of rural existence on family farms, or diversion of property from use as family farms.