

Exhibit:	
Issue(s):	Routing Concerns
Type of Exhibit:	Surrebuttal Testimony
Witness:	Rebecca McGinley
Sponsoring Party:	McGinley- Krawczyk Farms, LLC
File No.:	EA-2024-0302
Date Testimony Prepared:	August 28, 2025

MISSOURI PUBLIC SERVICE COMMISSION  
FILE NO. EA-2024-0302

SURREBUTTAL TESTIMONY

OF

REBECCA MCGINLEY

ON BEHALF OF

MCGINLEY-KRAWCZYK FARMS, LLC

August 28, 2025

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1    **I. INTRODUCTION**

2            **Q.    Please state your name and address.**

3            A.    Rebecca McGinley, \*\*\* [REDACTED]

[REDACTED]\*\*\*.

5            **Q.    Are you the same Rebecca McGinley who previously**  
6    **submitted direct testimony in this matter?**

7            A.    Yes

8    **II. Purpose of Testimony**

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

10          A.    My surrebuttal testimony responds to various assertions and  
11    claims contained within the rebuttal testimony of ATXI witnesses Mr. Chris  
12    Korsmeyer (Korsmeyer Reb.), Mr. Sam Morris (Morris Reb.), Mr. James  
13    Nicholas (Nicholas Reb.), and Ms. Leah Dettmers (Dettmers Reb.).

14          **Q.    Please summarize your testimony.**

15          A.    ATXI's rebuttal testimony fails to adequately address the  
16    fundamental issue: the proposed route places a major transmission line  
17    unacceptably close to occupied family residences when viable alternatives  
18    exist that would provide adequate protection at minimal additional cost. The  
19    Commission should prioritize the protection of residential properties and  
20    families over convenience and minor cost savings.

1    **III. ATXI Admissions**

2            **Q.    Does ATXI object to your proposed alternatives?**

3            A.    \*\*\* [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED].

8            [REDACTED]  
[REDACTED]\*\*\*

10           **Q.    \*\*\* [REDACTED]**  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]\*\*\*

15           A.    No.

16           **Q.    Do you agree to the route as proposed by ATXI?**

17           A.    No.

---

<sup>1</sup> See Morris Reb. 13:16-14:4.

<sup>2</sup> See Schedule MS-7.

1           **Q.   \*\*\*** [REDACTED]

[REDACTED]

[REDACTED] \*\*\*

4           A.   No.

5           **Q.   Does that variation require a transmission line within**  
6 **1,000 foot of an occupied residence?**

7           A.   No.

8           **Q.   \*\*\*** [REDACTED]

[REDACTED] \*\*\*

10          A.   My preferred alternative remains McGinley Modification 1.

11   However, I prefer McGinley Modification 2 to ATXI's Proposed Route.

12          **Q.   \*\*\*** [REDACTED]

[REDACTED] \*\*\*

14          A.   \*\*\* [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] \*\*\*

20

21

1    **III.    Route Selection Process**

2            **Q.    \*\*\*** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] \*\*\*

7            **A.    \*\*\*** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11           [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] \*\*\*

18           **Q.    \*\*\*** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] \*\*\*

3           A.     \*\*\* [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8           [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] \*\*\*

13           Q.     \*\*\* [REDACTED]

[REDACTED] \*\*\* Do you agree?

15           A.     Professional standards require more than following a checklist -

16   they require genuine engagement with affected communities and transparent

17   decision-making. ATXI's process failed both tests.

18           \*\*\* [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1 [REDACTED]

[REDACTED]

[REDACTED]\*\*\*

4 ATXI may have followed their internal procedures, but that's not the  
5 same as meeting professional standards for community engagement and  
6 transparent decision-making.

7 **Q. How should the Commission evaluate ATXI's claim that**  
8 **their approach meets industry standards?**

9 A. The Commission should ask whether meeting minimum  
10 standards is sufficient for a project of this magnitude and impact. Industry  
11 standards should be a floor, not a ceiling, for utility performance.

12 ATXI's own admissions - \*\*\* [REDACTED]

[REDACTED]\*\*\*- demonstrate that even  
14 if they met minimum standards, their performance fell short of what affected  
15 communities deserved.

16 The Commission has the authority and responsibility to expect utilities  
17 to exceed minimum standards when community impacts are significant.  
18 That's especially important in rural areas where transmission projects can  
19 have disproportionate impacts.

20

21



**IV. Property Concerns**

**A. Diminish Land and Home Values**

**Q. ATXI witness Korsmeyer relies on a single article by Roddewig & Brigden to argue that transmission lines do not impact property values. Do you agree with this analysis?**

A. No, I do not agree with ATXI's reliance on this single study for several reasons. First, the Roddewig & Brigden article was written by authors who were "retained by the electric utility company" to address issues raised in Illinois proceeding to support their transmission line application. This raises obvious questions about the independence and objectivity of the analysis.

Second, Mr. Korsmeyer dismisses my cited sources as "anecdotal" while treating this utility-sponsored article as definitive. However, my sources include real examples of impacts to homeowners, while ATXI's study was published in a real estate industry publication with clear financial interests in the outcome. The Roddewig & Brigden article that ATXI relies upon actually supports my position in key respects. The authors acknowledge that "some studies have found adverse impacts." and cite peer-reviewed research showing property value impacts "usually in the range of 3 to 6 percent" when impacts occur. In addition, the academic literature ATXI cites shows that

1 impacts are most significant the closer a transmission line is to an occupied  
2 residence.

3 Third, the Roddewig & Brigden study focuses primarily on existing  
4 transmission lines and their long-term market impacts. It does not  
5 adequately address the immediate impact on property values when new  
6 transmission lines are constructed near existing homes, particularly  
7 occupied residences with young families.

8 Fourth, ATXI's witness fails to address the fundamental difference  
9 between my situation and the cases studied in their article. I am not selling  
10 my property - I am a long-term resident with two young children who will be  
11 forced to live less than 400 feet from a 345kV transmission line for years to  
12 come.

13 **Q. What is your response to ATXI's claim that they will**  
14 **provide "fair market value" compensation that makes landowners**  
15 **"whole"? Korsmeyer Reb. 8:17-9:5.**

16 **A.** ATXI's compensation approach fails to address my core concerns  
17 for several reasons:

18 First, no amount of easement compensation can restore the quiet  
19 enjoyment of my newly constructed home or eliminate my concerns about  
20 EMF exposure for my children. Second, "fair market value" easement  
21 compensation typically covers only the value of the land subject to the

1 easement, not the diminished value of the entire property due to proximity  
2 impacts. Third, ATXI provides no details about their appraisal methodology  
3 or whether it will account for the unique circumstances of occupied  
4 residential properties versus agricultural land.

5 Most importantly, the issue is not just about money - it's about the  
6 Commission's obligation to consider whether there are reasonable  
7 alternatives that would avoid imposing these impacts on occupied family  
8 residences.

9 **Q. Did the various rebuttal testimonies submitted by ATXI**  
10 **help assuage your concern over diminishment of value as a result of**  
11 **the proposed route?**

12 A. No, the rebuttal testimonies did not adequately address my  
13 primary concerns regarding property value diminishment. One of my main  
14 concerns with the diminishment of property value was due to how many  
15 powerlines would be on some of my land. Moreover, the proximity of the  
16 corridor and the powerlines to a residence results in increased diminishment  
17 of value, beyond just the impact on purely agricultural property. The rebuttal  
18 testimony primarily addressed concerns about having a single transmission  
19 line and failed to acknowledge or analyze the cumulative impact of larger  
20 transmission corridors from parallel lines crossing the same properties. *See*  
21 *generally Korsmeyer Reb.* This larger corridor creates a fundamentally

1 different impact on property use, residences, agricultural operations, and  
2 market value than a single line, yet ATXI's rebuttal testimony does not  
3 differentiate between these scenarios or provide any compensation  
4 methodology for multiple-line larger corridor impacts.

5 **Q. Did ATXI's rebuttal testimony provide adequate assurance**  
6 **regarding the coordination of maintenance activities across multiple**  
7 **transmission lines of different entities?**

8 A. No, the rebuttal testimony provided insufficient detail about how  
9 maintenance activities would be coordinated when multiple transmission  
10 lines (of multiple entities) cross the same properties, something that this  
11 Commission should expect for a project of this scope. The testimony referred  
12 to standard maintenance and reimbursement protocols but failed to address  
13 how simultaneous or sequential maintenance on multiple lines would impact  
14 agricultural operations, property access, and compensation for crop losses  
15 (Korsmeyer Reb. 7:12-20). There was no discussion of whether landowners  
16 would face multiple disruptions throughout the year or how emergency  
17 repairs on one line might affect access to or operations near the other  
18 transmission corridors. This lack of coordination planning creates  
19 uncertainty about the ongoing operational impacts on my farming operations  
20 and my residence, including my young children. As they are school age  
21 children the operational impacts could impact school access by impacting our

1 access to roads and also to the safety of children while repair activities are  
2 occurring near my residence.

3 **Q. Did the rebuttal testimony raise any additional concerns**  
4 **about diminished land value you had not previously considered?**

5 A. Yes. \*\*\* [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] \*\*\*

18 **Q. Based on the rebuttal testimony, do you believe ATXI has**  
19 **adequately demonstrated that the proposed routing minimizes**  
20 **impacts to your properties?**

1           A.     No, the rebuttal testimony did not demonstrate that alternative  
2     routing options were adequately considered to minimize the concentration of  
3     multiple transmission lines on my properties. There was no analysis of  
4     whether utilizing the same existing easement (rather than a parallel  
5     easement) or the alternative routes could distribute the transmission  
6     infrastructure more equitably across the service territory rather than  
7     concentrating multiple lines on the same properties. The rebuttal testimony  
8     appeared to prioritize convenience and cost savings over equitable  
9     distribution of transmission impacts among affected landowners.

10  
11    **B.     Impairment of Contracts - USDA Conservation Reserve**  
12    **Program**

13           **Q.     Did ATXI's rebuttal testimony adequately address your**  
14    **concerns about the impact of the Project on your Conservation**  
15    **Reserve Program (CRP) contracts?**

16           A.     No, ATXI's rebuttal testimony oversimplifies the potential  
17     impacts to CRP contracts and fails to address several critical concerns. While  
18     the rebuttal states that CRP contracts would only be affected if the land  
19     becomes "entirely inconsistent" with CRP objectives (Korsmeyer Reb. 13:4-7),  
20     this ignores the practical reality that even partial impacts can trigger USDA  
21     compliance issues or contract modifications.

1           **Q. Did the rebuttal testimony adequately address the**  
2           **uncertainty regarding USDA's determination of CRP contract**  
3           **impacts?**

4           A. No, the rebuttal testimony presents ATXI's interpretation of  
5           when CRP contracts might be affected but provides no assurance that the  
6           USDA will reach the same conclusion. Further, the witness testifying to this  
7           interpretation, Korsmeyer, is not an attorney and claims he is not making  
8           any legal opinions (Korsmeyer Reb. 4:2-4). Mr. Korsmeyer testified that  
9           impacts would be minimal, but this does not account for the USDA's sole  
10          authority to determine whether transmission line easements are compatible  
11          with existing CRP contracts. The rebuttal testimony provides no evidence  
12          that ATXI has consulted with USDA regarding the specific conservation  
13          practices and objectives outlined in our CRP contracts for parcels 10-05-21-08  
14          and 10-08-28-01. This creates significant uncertainty about whether we  
15          might be required to repay previously received CRP payments or forfeit  
16          future payments, risks that extend far beyond ATXI's compensation  
17          promises.

18          **Q. Does ATXI's promise to compensate for CRP payment**  
19          **losses adequately protect your interests?**

20          A. No, ATXI's commitment to compensate for lost CRP payments  
21          does not fully protect our interests for several reasons. First, the rebuttal

1 testimony does not address potential repayment obligations to USDA for  
2 previously received CRP payments if the contracts are terminated or  
3 modified. Additionally, there is no discussion of how ATXI would compensate  
4 for the administrative burden, legal costs, and uncertainty associated with  
5 renegotiating CRP contracts or dealing with USDA compliance issues. The  
6 testimony also fails to address whether ATXI's compensation would cover  
7 penalty payments or interest charges that USDA might assess if contract  
8 violations occur.

9 **Q. Did the rebuttal testimony address the timing and process**  
10 **concerns related to CRP contract modifications?**

11 A. No, the rebuttal testimony does not address the timing  
12 challenges associated with CRP contract modifications or terminations. Our  
13 current CRP contracts have specific terms running through September 30,  
14 2035, and any modifications would require USDA approval processes that  
15 could take months or even years to complete. The rebuttal testimony provides  
16 no assurance about how construction schedules would be coordinated with  
17 USDA approval processes, or what would happen if USDA determinations  
18 are delayed or differ from ATXI's expectations. Additionally, there is no  
19 discussion of how ongoing maintenance activities might trigger future CRP  
20 compliance issues throughout the life of the transmission line, potentially  
21 creating recurring conflicts with our conservation obligations.





1           **Q. Did the rebuttal testimony adequately address the**  
2           **cumulative EMF exposure from multiple transmission lines crossing**  
3           **your properties?**

[illegible]

1           **Q. Did ATXI's witness demonstrate adequate expertise to**  
2   **dismiss peer-reviewed health research?**

[illegible]

18           **Q.**    Did the rebuttal testimony address your concerns about  
19   **vulnerable populations, particularly children?**

20 A. No. \*\*\*

1 [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] \*\*\*

14           **Q.**     Did ATXI's rebuttal testimony adequately address the  
15   precautionary principle given the uncertainty in EMF research?

16           A.     No. \*\*\* [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

1 [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]\*\*\*

10 Q. Did the rebuttal testimony provide adequate information  
11 about long-term EMF exposure monitoring and mitigation measures?

12 A. \*\*\* [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

---

3 \*\*\* [REDACTED]  
[REDACTED]\*\*\*

1 [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] \*\*\*

8

9 **V. The McGinley Alternative Routes**

10 **Q.** \*\*\* [REDACTED]  
[REDACTED]  
[REDACTED] \*\*\*

13 **A.** Yes. However, all of these landowners were previously notified  
14 that their property would be impacted. This modification simply impacts the  
15 their property differently, but in no case moves the route within 1,000 feet of  
16 an occupied residential dwelling.

17 **Q.** \*\*\* [REDACTED]  
[REDACTED]

---

<sup>4</sup> Identified by Mr. Morris as “McGinley Modification 1” (Morris Reb. 14).

1 [REDACTED]

[REDACTED] \*\*\*

3 A. \*\*\* [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] \*\*\*

13 Q. \*\*\* [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] \*\*\*

17 A. \*\*\* [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1 [REDACTED]  
[REDACTED]\*\*\*

3 **Q. How do your proposed route modifications better serve**  
4 **the public interest?**

5 A. The Commission must consider that the "public interest" includes  
6 protecting occupied residential properties, particularly those with children.  
7 My proposed modification achieves this protection at minimal additional cost  
8 and impact. The modification would:

- 9 1. Increase the distance from occupied residential structures from less  
10 than 400 feet to over 1,000 feet;
- 11 2. Reduce potential EMF exposure for children and families;
- 12 3. Minimize visual and noise impacts on residential properties;
- 13 4. \*\*\*[REDACTED]\*\*\*; and
- 14 5. Impact only agricultural land rather than residential property.

15 The additional costs cited by ATXI witnesses are minimal compared to the  
16 benefits of protecting residential properties and should be considered a  
17 reasonable expense to serve the public interest.

18

## 19 **VI. Conclusion**

20 **Q. What are you asking the Commission to do?**



1           A.     I respectfully request that the Commission, if it grants ATXI's  
2     application for a Certificate of Convenience and Necessity, modify the  
3     approved route to adopt McGinley Modification 1 as shown in Schedule MS-7.  
4     This modification would demonstrate the Commission's commitment to  
5     protecting residential properties and families while still allowing ATXI to  
6     construct the transmission line needed for grid reliability.

7           **Q.     Does this conclude your testimony?**

8           A.     Yes.

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of the Application of Ameren )  
Transmission Company of Illinois for a )  
Certificate of Convenience and Necessity ) File No. EA-2024-0302  
Under Section 393.170.1, RSMo Relating )  
to Transmission Investments in Northwest )  
and Northeast Missouri )

**AFFIDAVIT OF REBECCA MCGINLEY**

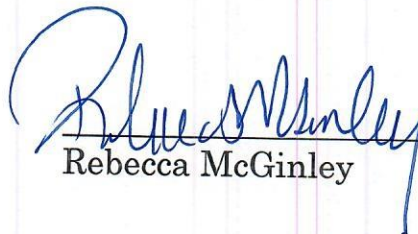
State of Missouri )  
 ) ss.  
County of Gentry )

Rebecca McGinley, being first duly sworn on her oath, states:

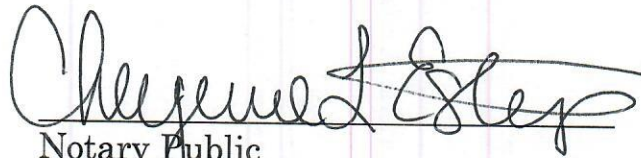
1. My name is Rebecca McGinley. I live at 3752 State Highway H, Darlington, Missouri 64438.

2. Attached to this affidavit and made a part hereof for all purposes is my Written Surrebuttal Testimony (testimony) on behalf of myself and McGinley-Krawczyk Farms, LLC. The testimony is 24 pages and has been prepared in the appropriate format to be introduced into evidence in the case above.

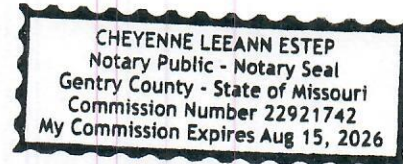
3. I hereby swear and affirm that my answers contained in the attached testimony to the questions promulgated therein are true and correct.

  
\_\_\_\_\_  
Rebecca McGinley

Subscribed and sworn to before me, the undersigned, a Notary Public in  
and for the county and state aforesaid, on this 28th day of August 2025.

  
Notary Public

My Commission Expires: Aug 15 2026



Schedule MS-7 is CONFIDENTIAL