

Exhibit No. 951

McGinley-Krawczyk Farms, LLC – Exhibit 951
Testimony of Rebecca McGinley
Surrebuttal
File No. EA-2024-0302

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]

4 [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.

¹ See Morris Reb. 13:16-14:4.

² 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. *** [REDACTED]

[REDACTED]

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]

⁴ 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

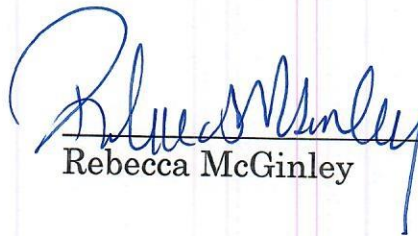
State of Missouri)
) ss.
County of Gentry)

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.

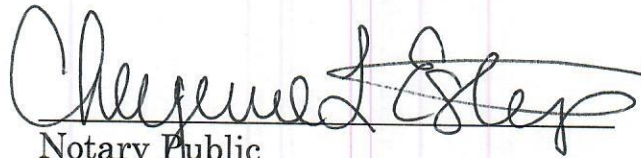
2. Attached to this affidavit and made a part hereof for all purposes is my Written Surrebuttal Testimony (testimony) on behalf of myself and McGinley-Krawczyk Farms, LLC. The testimony is 24 pages and has been prepared in the appropriate format to be introduced into evidence in the case above.

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

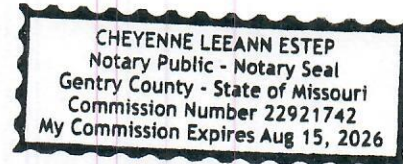


Rebecca McGinley

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