February 2, 2016 **Data Center** Missouri Public Exhibit No.: Service Commission

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

Witness: Noel Palmer Type of Exhibit: Rebuttal Testimony

Sponsoring Party: Neighbors United graph avector a beautiful at A a southant exemient graph by 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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REBUTTAL TESTIMONY

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NOEL PALMER

ON BEHALF OF

NEIGHBORS UNITED AGAINST AMEREN'S POWER LINE

OCTOBER 21, 2015

RESPONDENT'S **EXHIBIT**

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,	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 ir		
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	ave 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.			

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

- A: In the 39 years of flying my home area, central Missouri, all surrounding states plus Mississippi and Minnesota, I've had a lot of experience working around all types of power lines. Many fields that I spray have some sort of electric line whether a distribution or transmission line. The transmission lines already in this area that I regularly spray around are 161,000 and 69,000 volts.
- Q: Please describe the problems that high-voltage transmission lines and structures like those proposed in this case cause in your crop dusting business.
- A: First and foremost, I must avoid any contact with the line and/or structure. I stay 2 passes (100-120 ft) away from the closest conductor when flying parallel to the electric transmission lines. This cuts into the total number of acres that could be treated due to the line, which would in turn cut into the acres being paid to spray. Simply put, I cannot and do not finish fields with the big transmission lines and this is why—unlike distribution lines that run along field borders and roads in a square and organized pattern, transmission lines simply cut across country in a straight line cutting fields in odd angle patterns. Flying under these lines with an 8-10 foot tall crop, a 12-foot tall aircraft with a safe crop clearance is impossible especially with the heat of summer, growing season and tremendous line sag. (Heat sag that will also affect modern day, tall ground equipment, sprayers with 80-120 foot spray booms used by custom applicators). Flying over the top of the line is just too high to control spray drift for insurance reasons and crop penetration performance. Some pesticides are quite corrosive even to stainless steel.

1	My experience spraying parallel with high voltage lines, such as our local 161,000 vo		
2	line of Northeast Power, is to allow about 2 spray swaths (width 100-120ft) distance to avoi		
3	GPS interference. My GPS is also tied into my chemical flow control output for proper rat		
4	output. I have experienced problems from time to time with interference on a long spray run nex		
5	to these lines. I can only imagine that with a higher voltage line, there will be more problems. A		
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 ac	res of farmland would you not be able to treat along a	
9	transmission line?		
10	A: When using 1	50 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 al	ways 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 tha		
18	cannot be treated by airplane	be treated by crew on the ground?	
19	A: Sometimes by a	ir 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 exis	tence of the proposed transmission line have any affect on	
22	your business and the busines	s of other crop dusters across northern Missouri?	

- A: Yes. The acreage treated will not equal the acreage that would have been treated without the line because of the safety concerns addressed earlier. Being paid by the acre, the additional transmission line would not only have a financial impact on my business, but that of other crop dusters.
- 5 Q: Could the line also affect the crop yields of your clients?
- A: Yes, very possible. If air application is the only option and part of the acreage can no longer be treated, then the yield of the crop could negatively be affected, which in turn could impact their business.
- 9 Q: Does that complete your testimony?
- 10 A: Yes. Thank you.

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BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Ameren Transmission Company of Illinois for Other Relief or, in the Alternative, a Certificate of Public Convenience and Necessity Authorizing it to Construct, Install, Own, Operate, Maintain and Otherwise Control and Manage a 345,000-volt Electric Transmission Line from Palmyra, Missouri, to the Iowa Border and Associated Substation near Kirksville, Missouri. File No. EA-2015-0146
AFFIDAVIT OF NOEL PALMER
STATE OF MISSOURI)
STATE OF MISSOURI) ss COUNTY OF Shelf)
Noel Palmer, being first duly sworn on his oath states:
1. My name is Noel Palmer, and I am self-employed with Palmer Ag Air, located at
66524 State Highway 15, Novelty, MO.
2. Attached hereto and made a part hereof for all purposes is my rebuttal testimony
on behalf of Neighbors United Against Ameren's Power Line consisting of <u>5</u> pages
prepared in written form for introduction into evidence in the above-referenced docket.
3. I hereby swear that my answers to the questions contained in the attached rebuttal
testimony are true and correct to the best of my knowledge, information and belief. Noel Palmer
Subscribed and sworn to before me this 2154 day of October, 2015
DEBORAH E. GIBBONS Notary Public - Notary Seal State of Missouri Commissioned for Shelby County My Commission Expires: April 23, 2018 Commission Number: 14608474