Exhibit No.:	
Issue(s):	Public Interest, Farming Implications
Witness:	Robert D. Jackson
Sponsoring Party:	Neighbors United Against Ameren's Power Line
Type of Exhibit:	Surrebuttal Testimony
Case No.:	EA-2015-0146
Date Testimony Prepared:	November 16, 2015

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO. EA-2015-0146

SURREBUTTAL TESTIMONY

OF

ROBERT D. JACKSON

ON BEHALF OF

NEIGHBORS UNITED AGAINST AMEREN'S POWER LINE

November 16, 2015

Q. Please state your name.

A. Robert D. Jackson

Q. And where are you employed.

A. I have been a Missouri farmer since 1970. Throughout the years I have owned and managed approximately 1500 acres, and raised corn, soybeans, hay crops, lambs, and cattle. My farm was a commercial hay crop producer and shipped products all throughout the United States.

Q. Please explain your association with the Missouri Farm Bureau.

A. Beginning in the 1970's, I was elected to the Missouri State Farm Bureau Board of Directors for six terms. In the 1980's, I was elected as State Vice-President for two terms. While Vice-President I chaired the Resolutions Committee while completing my other duties with the organization.

Since 1968, I have been a member of the Local Adair/Schuyler County Farm Bureau, and in the 2000's I was elected as the local county Farm Bureau President.

Q. Did you file rebuttal testimony in this case?

A. No I did not. However, Mr. Charlie Kruse did. Since the filing of rebuttal testimony, Mr. Kruse has retired from his position with the Farm Bureau. Due to his retirement, I am adopting his expert testimony and will be available for the evidentiary hearing in this matter in December 2015.

Q. What is the purpose of your surrebuttal testimony?

A. First, let me begin by stating that it remains Neighbors Uniteds' position that this line is unnecessary and not in the public interest. As such, the required Tartan Criteria are not met and the Commission should deny ATXI's application. The surrebuttal testimony of

expert witness Bill Powers will also discuss why the line is unnecessary. The purpose of my surrebuttal testimony is to address the conditions to the Commission's granting ATXI a Certificate of Convenience and Necessity that Staff, particularly, Mr. Dan Beck, included in his rebuttal testimony at page 13, lines 10-20, through page 14, lines 1-17, page 16 lines 17-27, through page 17, lines 1-25, and Schedule DB-R-2.

Q. Does Staff believe that ATXI has met the Tartan criteria?

A. No, they do not. As stated in Mr. Beck's rebuttal testimony at page 5, line 23, through page 6, lines 1-3:

> Q. In Staff's opinion, has ATXI met the Tartan criteria?
> A. No. However, Staff in its Rebuttal Testimony, has addressed the Tartan criteria and explains that with the appropriate conditions, the Application is sufficient to address the criteria.

Q. In your expert opinion, are these added conditions sufficient to now make ATXI's Application now meet the Tartan criteria.

A. No, they are not. Again, Neighbors United's position is that this project is unnecessary as explained in the testimony of Bill Powers. Further, these conditions fail to protect landowners from unwarranted intrusions onto their land and infringes upon their ability to continue their farming and ranching operations on their land.

Q. Please explain.

A. Approximately 378 parcels will be affected if the Commission approves ATXI's Application. Neighbors United has had the extensive opportunity to speak with the affected landowners to determine exactly how their farming and ranching operations will be impacted. Attached as Schedules 1 through 5 are affidavits from farmers and ranchers across the five counties (Marion, Knox, Shelby, Adair and Schuyler) that ATXI has proposed constructing the transmission line across. I have personally reviewed the affidavits and

each identify the parcel of property that will be impacted, the operations that occur on the land today, and how a transmission line the size that ATXI has proposed will negatively effect their operations, if not prevent them in total.

Q. From your experience with the Farm Bureau and your farming background, are these reasonable representations of the effect the transmission line will have on these farming and ranching parcels.

A. Yes.

Q. Are you aware of any other reasons that the added conditions recommended by Staff are insufficient to make ATXI's Application now meet the Tartan criteria.

Yes. ATXI has picked a final route that diagonally cuts across many of the parcels. Neighbors United has an outstanding data request with ATXI to determine the exact number of parcels that the final route will diagonally cut across and to obtain maps of the proposed line across all parcels. However, there are numerous parcels where the proposed line will transect property, interrupting operations across the entire parcel.

Q. Please explain further.

A. Based on discussions with our counsel, I understand that any infringement by ATXI on our farming and ranching operations is a violation of the recent Constitutional amendment, Article I, Section 35 of the Missouri Constitution. Leaving that argument to our counsel, there are other practical reasons as mentioned in the rebuttal testimony of Mr. Kruse and Mr. Palmer that running a transmission line directly down the center or diagonally across a parcel interferes with operations to a greater extent than running the transmission line across properties in a way that observes property boundary lines. Staff's conditions do not and cannot address this added impact. There were numerous affected

landowners that testified at the local public hearings that the line would diagonally cross their parcel and how such line will infringe upon their operations on their parcel. Attached as Schedule 6 is a listing of the local public hearing testimonies that discuss this.

Q. Please summarize your position.

A. It remains our position that the Commission should not grant ATXI's application because ATXI has not met their burden to meet all of the Tartan criteria. Further, the additional conditions Staff believes will allow ATXI to meet the criteria will not actually protect or address the landowners operations and concerns.

Q. Does this complete your surrebuttal testimony?

A. Yes it does. Thank you.

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 ROBERT D. JACKSON

STATE OF MISSOURI)
) **ss**
COUNTY OF Adair)

Robert D. Jackson, being first duly sworn on his oath states:

1. My name is Robert D. Jackson and I am a Missouri farmer and member of both the state and county level Missouri Farm Bureau.

2. Attached hereto and made a part hereof for all purposes is my surrebuttal testimony on behalf of Neighbors United Against Ameren's Power Line consisting of 4 pages prepared in written form along with six (6) schedules 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.

Robert D. Jackson

Subscribed and sworn to before me this 16th day of November, 2015 15

JEANETTE MONCRIEF
Notary Public, Notary Seal
State of Missouri
Adair County
Commission # 14926590
My Commission Expires August 14, 2018

Notary Public