

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

In the Matter of the Application of Grain)
Belt Express, LLC for a Siting Permit for the)
Construction of Two 345 kV Transmission) Docket No. 24-GBEE-790-STG
Lines and Associated Facilities through)
Gray, Meade, and Ford Counties, Kansas.)

**REBUTTAL TESTIMONY OF
JAMIE PRECHT
ON BEHALF OF
GRAIN BELT EXPRESS LLC**

July 26, 2024

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1 **I. INTRODUCTION**

2 **Q. Please state your name, business address, and present position.**

3 A. My name is Jamie Precht. I am the Manager of the Environmental Studies
4 Department of Burns & McDonnell Engineering Company, Inc. (“Burns & McDonnell”). My
5 business address is 9450 Ward Parkway in Kansas City, Missouri 64114.

6 **Q. Are you the same Jamie Precht who previously filed direct testimony in this**
7 **proceeding?**

8 A. Yes, I am.

9 **Q. Has this testimony been prepared by you or under your direct supervision?**

10 A. Yes, it has.

11 **Q. What is the purpose of your Rebuttal Testimony?**

12 A. The purpose of my Rebuttal Testimony is to respond to portions of testimony
13 submitted by Bradley Boyd, specifically regarding his alternate route proposals.

14 **Q. Are you sponsoring any exhibits as part of your Rebuttal Testimony?**

15 A. Yes, I am sponsoring the following exhibit:

- 16 • Exhibit JP-7¹ – Map of Boyd Alternative Routes and Proposed Route

17 **II. EVALUATION OF ALTERNATIVE ROUTES**

18 **Q. Have you reviewed Mr. Bradley Boyd’s written direct testimony?**

19 A. Yes, I have.

20 **Q. Can you summarize Mr. Boyd’s direct testimony?**

21 A. Mr. Boyd is a landowner along Grain Belt Express’ Proposed Route for the Meade-
22 Dodge City Line. Mr. Boyd’s direct testimony disputes the Meade-Dodge City Line’s proposed

¹ Exhibits JP-1 through JP-6 were included with my Direct Testimony.

1 route’s reasonableness and proposes an alternative route (“Boyd Alternative 1”).² Mr. Boyd also
2 proposed a second alternative route in a letter to the KCC Staff (“Boyd Alternative 2”), which I
3 also address below.

4 **Q. Please summarize Boyd Alternative 1, as described in Mr. Boyd’s Direct**
5 **Testimony.**

6 A. The Proposed Route, as filed by Grain Belt Express, goes from west to east along
7 C Road and then turns north at Highway 23/Road 18 and tracks Road 18 north approximately ten
8 miles before turning back to the east. Mr. Boyd proposes that the line should “turn north two miles
9 sooner on C Road and go north to JJ Road/16 Road and continue going north on 16 Road until it
10 turns back to the east to . . . CC Road.”³ Mr. Boyd also provided Exhibit BBB-1 illustrating the
11 Proposed Route and Boyd Alternative 1.

12 **Q. What is your position on whether Boyd Alternative 1 should be accepted?**

13 A. Boyd Alternative 1 is not consistent with the routing principles identified in the
14 Routing Study because of its potential to have greater impacts to designated critical habitat
15 associated with Crooked Creek, closer proximity to residential structures and potential for
16 increased visibility with less vegetative screening, greater acres of row crop and pivot irrigation
17 crossed combined, access concerns, and increased potential conflicts to existing utilities within
18 and along the proposed alternative route’s right-of-way (utility building in right-of-way and
19 additional distribution lines being paralleled) as compared to the corresponding segments of the
20 Proposed Route.

² See generally Direct Testimony of Bradley B. Boyd, at pp. 2–5 (“Boyd Direct Testimony”).

³ *Id.* at p. 4.

1 **Q. What are the increased social impacts of Boyd Alternative 1?**

2 A. Boyd Alternative 1 has the potential to increase visibility for residences along 16
3 Road compared to residences along the Grain Belt Proposed Route. The residential structure
4 identified from aerial imagery at the corner of 16 Road/JJ Road would be approximately 231 feet
5 from the Boyd Alternative 1 centerline. An additional residential structure is visible on recent
6 aerial imagery near the southwest corner of 16 Road/E Road which is approximately 228 feet from
7 Boyd Alternative 1. While Boyd Alternative 1 has one less residential structure within 300 feet of
8 centerline compared to the Grain Belt proposed route, both of these residential structures along
9 Boyd Alternative 1 are located closer to the route centerline than any of the three closest residential
10 structures along the corresponding portion of the Grain Belt proposed route. The residential
11 structures within 500 feet of the corresponding portion of the Grain Belt Proposed Route are
12 approximately 273 feet, 358 feet, and 395 feet, respectively. In addition to being further away,
13 these three residences along the Grain Belt proposed route were observed to be heavily screened
14 by existing vegetative cover such as evergreens, thereby potentially reducing the visual impacts of
15 the proposed route, while the residences along Boyd Alternative 1 do not appear to have any such
16 vegetative screening.

17 Potential impacts of Boyd Alternative 1 to agricultural practices were different from the
18 Grain Belt Express Proposed Route. While Boyd Alternative 1 reduces the amount of center-pivot
19 irrigation crossed, it does potentially impact more non-irrigated cropland/row crops compared to
20 the Grain Belt Express Proposed Route. I understand that impacts to the pivot-irrigation areas can
21 be mitigated by spanning of these locations where feasible; however, potential impacts to non-
22 irrigated croplands, which are potentially too large to span, are greater along Boyd Alternative 1.

1 **Q. What are the increased environmental impacts of Boyd Alternative 1?**

2 A. Constraints identified in the study area included sensitive species habitat. As part
3 of the agency outreach for the Meade Line, the Kansas Department of Wildlife and Parks
4 (“KDWP”) indicated that Crooked Creek in Meade County is designated critical habitat for the
5 plains minnow (*Hybognathus placitus*), a state-listed threatened species (Exhibit JP-2; pp. 173-
6 175). The Boyd route crosses the designated critical habitat of the plains minnow by crossing
7 Crooked Creek in Meade County. Additionally, Boyd Alternative 1 crosses Crooked Creek
8 through an adjacent grassland area. KDWP stated that new lines should be routed through cropland
9 and/or along road rights-of-way when possible. The Grain Belt Express Proposed Route follows
10 this guidance by crossing Crooked Creek along existing road right-of-way while the Boyd
11 Alternative 1 does not. All of the route alternatives evaluated in the Routing Study (Exhibit JP-2)
12 crossed Crooked Creek along existing road or transmission rights-of-ways, which aligns with the
13 routing principles set forth in the Routing Study as well as guidance from KDWP.

14 **Q. Are there any other concerns you have with Boyd Alternative 1?**

15 A. Yes. A utility building was also observed at the southeast corner of the intersection
16 of 16 Road/HH Road that would be located within the right-of-way of Boyd Alternative 1. In order
17 to avoid this structure and potential impacts for both the utility building and the proposed
18 transmission line, additional impacts to agricultural practices are likely in order to avoid the utility
19 building, and the alignment would no longer parallel the road as closely in this area. Additional
20 angles in Boyd Alternative 1 may also be required to avoid this utility building. Boyd Alternative
21 1 also parallels existing distribution lines for over five additional miles compared to the Grain Belt
22 Express Proposed Route. As noted in the Routing Study (Exhibit JP-2, pp. 4-10), “paralleling

1 existing distribution lines can have additional engineering and construction challenges created by
2 construction next to or potentially underbuilding along [such routes].”

3 Boyd Alternative 1 does not follow an existing road between C Road and KK Road, while
4 Grain Belt Express’ Proposed Route does. With no north/south roads present along the Boyd Route
5 between C Road and KK Road, access to the route during and after construction could be more
6 difficult. To reduce potential impacts to streams and riparian areas during and after construction,
7 stream crossings are generally preferred at a perpendicular angle and the routes should avoid
8 paralleling waterways if possible. The Boyd Alternative 1 crosses Crooked Creek at a bend and
9 also parallels the creek for over 1,000 feet. Impacts to this critical habitat area could potentially be
10 greater with Boyd Alternative 1 and has greater potential for erosion and sedimentation impacts.
11 Access for potential maintenance could also present challenges without an established road,
12 especially following rain events.

13 **Q. Did Mr. Boyd propose another alternate route for Grain Belt Express’**
14 **consideration?**

15 A. Yes. We were notified via e-mail on July 12, 2024 that Mr. Boyd discussed another
16 potential re-route option (“Boyd Alternative 2”) with the KCC Staff at the local public hearing in
17 Dodge City on July 10, 2024. That e-mail indicated that Boyd Alternative 2 is Mr. Boyd’s first
18 choice as an alternative route.⁴ Boyd Alternative 2 would turn north approximately 3 miles east
19 of the intersection of 13 Road/C Road, towards the intersection of 16 Road/KK Road and proceed
20 north for 3 miles (one mile into Gray County), then turn east at the intersection of JJ Road/16 Road
21 (7 miles south of Boyd Alternative 1), and proceed east along JJ Road to Highway 23 (18 Road).

⁴ Office of Public Affairs and Consumer Protection Report on Public Comments, p. 16 (July 23, 2024) (“This would be my first choice as an alternative route . . .”).

1 **Q. What is your position on Boyd Alternative 2?**

2 A. For similar reasons, this route is inconsistent with the routing principles in the
3 Routing Study. Boyd Alternative 2 does not address the environmental concerns of Boyd
4 Alternative 1. As with Boyd Alternative 1, it does not cross through the designated critical habitat
5 associated with Crooked Creek along a road or through cropland, unlike the Grain Belt Express
6 Proposed Route. While Boyd Alternative 2 does address other concerns of Boyd Alternative 1 by
7 reducing distance along existing distribution lines and avoiding the utility building located within
8 the proposed right-of-way, it does not address the lack of existing roads and access between C
9 Road and KK road. Boyd Alternative 2 does remove one residential structure from Boyd
10 Alternative 1 and also increases the distance from the residence at the northwest corner of 16
11 Road/JJ Road. However, the potential visual impacts could potentially increase as a larger angle
12 structure would be required at the corner of 16 Road/JJ Road as it turns east. Because this is a turn,
13 the location of the structure would not likely be able to be micro-sited to reduce the potential
14 increase in visual impacts. Lastly, Boyd Alternative 2 increases the number of heavy angles by 2
15 compared to the Grain Belt Express Proposed Route and the Boyd Alternative 1. The acres of non-
16 irrigated cropland are still more than the Grain Belt Express Proposed Route and Boyd Alternative
17 2 does not decrease the acres of pivot-irrigation crossed compared to Boyd Alternative 1.

18 **Q. Should the Commission approve either of Mr. Boyd’s proposed alternate**
19 **routes?**

20 A. No, for the reasons stated above, I believe the Grain Belt Express Proposed Route
21 remains the best option compared to either of the Boyd alternative routes.

1 **Q. Is Grain Belt Express proposing any alternatives to address the Boyds’**
2 **concerns?**

3 A. Yes, I understand that Grain Belt Express is proposing an alternative, as discussed
4 in Kevin Chandler’s Rebuttal Testimony (the “Grain Belt Alternative”). For some of the same
5 reasons discussed with regard to the Boyd alternatives, the Grain Belt Alternative is not the optimal
6 solution based on the routing principles set forth in my Direct Testimony and the Routing Study.
7 However, it is consistent with a micrositing process more confined to the landowner’s property,
8 rather than a wholesale change to the Proposed Route. It is possible that the Grain Belt Alternative
9 has less impact on Crooked Creek and associated critical habitat areas than the Boyd alternatives,
10 subject to additional study of those impacts. The Grain Belt Alternative also avoids the additional
11 residences that would be impacted by the Boyd alternatives.

12 **III. CONCLUSION**

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

14 A. Yes, it does.

VERIFICATION

I, Jamie Precht, do solemnly, sincerely and truly declare and affirm that I am the Manager of the Environmental Studies Department at Burns & McDonnell Engineering Company, Inc., that I have read the foregoing testimony and know the contents thereof, and that the facts set forth therein are true and correct to the best of my knowledge and belief, and this I do under the pains and penalties of perjury.

By: /s/ Jamie Precht
Jamie Precht

July 26, 2024

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served upon the parties listed below by email or U.S. mail, postage prepaid, this 26th day of July, 2024.

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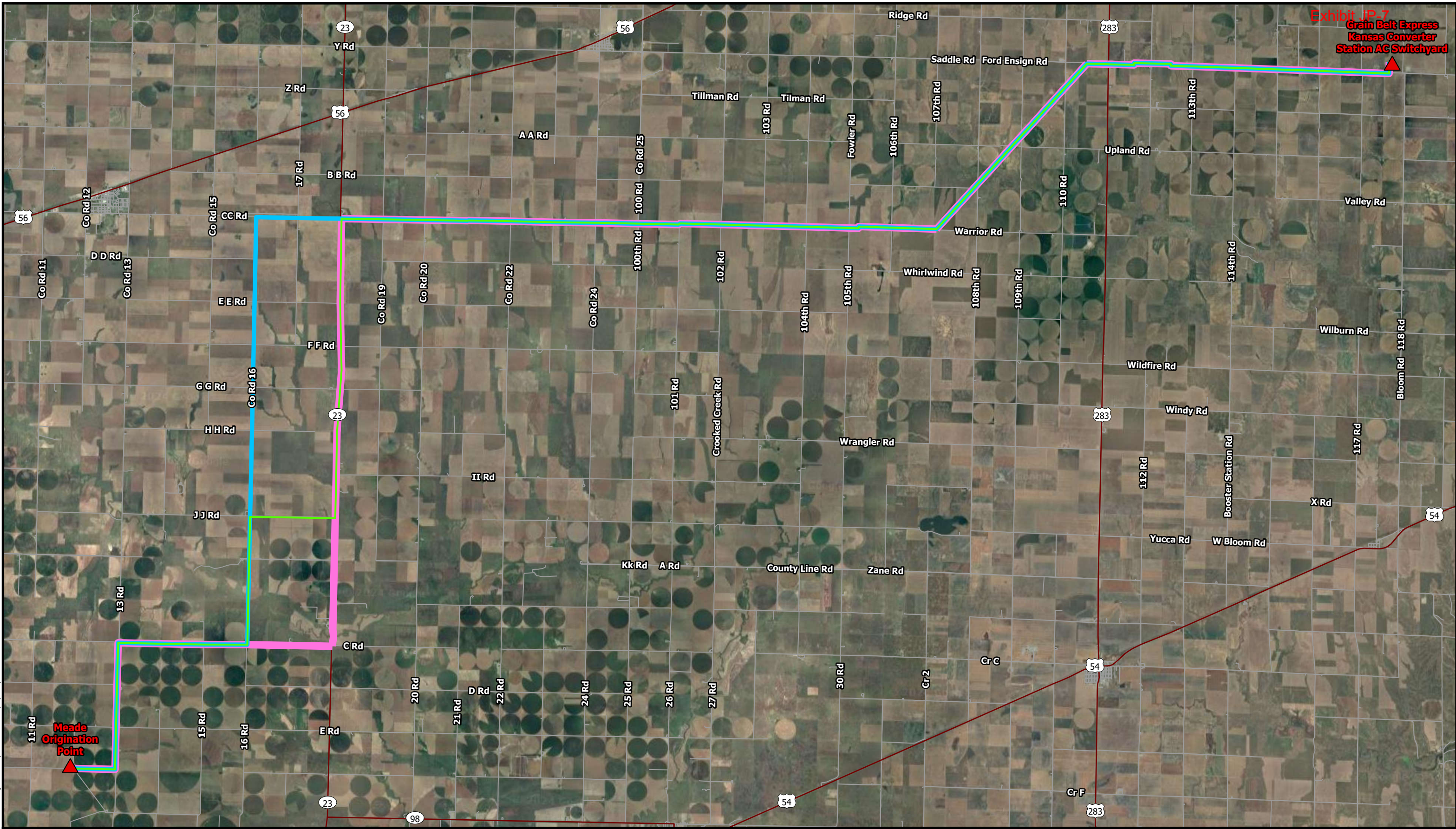
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- ▲ Project Endpoint
- Grain Belt Proposed Route
- Boyd Alternative 1
- Boyd Alternative 2

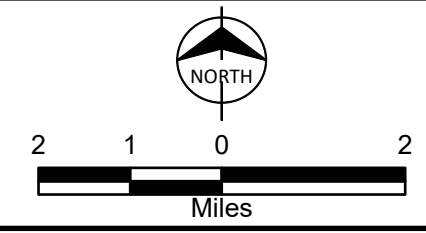


Exhibit JP-7
Boyd Reroute Requests
Meade Line
Kansas AC Collector System Grain
Belt Express
Ford, Gray and Meade Counties
Exhibit JP-7