

# Buchanan

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August 21, 2025

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

Re: Letter of Notification Application of PECO Energy Company filed Pursuant to 52 Pa. Code §§ 57.71 *et seq.* for Approval of the Siting and Construction of the 5034 Line Located in Peach Bottom Township, York County, Pennsylvania  
Docket No. A-2025-3056499

Dear Secretary Homsher:

Enclosed please find Transource Pennsylvania, LLC's Petition to Intervene ("Petition") filed in the above captioned matter. The Petition has been served as indicated on the attached Certificate of Service.

Thank you for your attention to this matter.

Sincerely,

BUCHANAN INGERSOLL & ROONEY PC

By:

  
\_\_\_\_\_  
John F. Povilaitis, Esquire

JFP/psm  
Enclosures  
cc: Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Letter of Notification Application of PECO Energy :  
Company Filed Pursuant to 52 Pa. Code §§ 57.71 *et seq.* :  
for Approval of the Siting and Construction of the 5034 : Docket No. A-2025-3056499  
Line Located in Peach Bottom Township, York County, :  
Pennsylvania :

**PETITION TO INTERVENE OF TRANSOURCE PENNSYLVANIA, LLC**

Pursuant to Sections 5.71-5.74 of the Pennsylvania Public Utility Commission's ("PaPUC" or "Commission") regulations, 52 Pa. Code § 5.71-5.74, Transource Pennsylvania, LLC ("Transource PA") hereby files this Petition to Intervene in connection with PECO Energy Company's ("PECO") recently filed Letter of Notification for Approval of the Siting and Construction of the 5034 Line Located in Peach Bottom Township, York County, Pennsylvania ("LON").

In support thereof, Transource PA represents as follows:

**I. Petition to Intervene and Transource PA Interest**

1. The proposed Intervenor is Transource PA, with the following address:

Transource Pennsylvania, LLC  
1 Riverside Plaza  
Columbus, Ohio 43215-2372

2. Transource PA's attorneys who are designated to receive service on behalf of

Transource PA are:

John F. Povilaitis (PA ID No. 28944)  
Alan M. Seltzer (PA ID No. 27890)  
409 N. Second Street, Suite 500  
Harrisburg, PA 17101  
Phone: (717) 237-4800  
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Email: [john.povilaitis@bipc.com](mailto:john.povilaitis@bipc.com)  
Email: [alan.seltzer@bipc.com](mailto:alan.seltzer@bipc.com)

Hector Garcia Santana (VA ID No. 48304)  
American Electric Power Service Corporation  
1 Riverside Plaza, 29<sup>th</sup> Floor  
Columbus, OH 43215  
Phone: 614-716-3410  
Fax: 614-716-1613  
E-mail: hgarcia1@aep.com

3. Transource PA is a limited liability company, organized and existing under the laws of Delaware. Transource PA is a wholly owned subsidiary of Transource Energy, LLC (“Transource Energy”), a partnership between two investor-owned utilities, American Electric Power Company, Inc. (“AEP”) and Evergy, Inc., formed to develop and invest in competitive electric transmission projects across the United States.

4. Transource PA was formed to construct, own, operate and maintain transmission facilities within the Commonwealth of Pennsylvania. Substations are a necessary component of electric transmission systems.

5. As noted in the LON, the PaPUC entered an order issuing a certificate of public convenience (“CPC”) to Transource and providing other approvals requested by Transource to proceed with construction of the Bramah Substation on December 19, 2024. *See Application of Transource Pa., LLC for Approval to Offer, Render, Furnish, or Supply Electric Transmission Service to the Public in the Commonwealth of Pa.*, Docket No. A-2024-3049272, & *Affiliated Interest Agreement of Transource Pa., LLC*, Docket No. G-2024-3049271 (Order entered Dec. 19, 2024). LON, p. 1, fn. 2.

6. As will be described further below, Transource PA has a direct, immediate and substantial interest in the relief requested by PECO in the LON, largely to ensure timely coordination of the construction and operation of the proposed Bramah electric transmission

substation into which the 5034 Line will interconnect and deliver energy. Transource PA therefore seeks to protect its interests in connection with PECO's request for siting authorization for the 5034 Line at issue in the LON.

## **II. Background**

7. On July 25, 2025, PECO filed the LON seeking, among other things, PaPUC approval to rebuild and relocate a short section of the existing electric transmission line and related structures in connection with the 5034 Line within Peach Bottom Township, York County, Pennsylvania ("Project").

8. PECO furnishes electric service to approximately 1.7 million electric customers and also serves over 553,000 natural gas customers throughout its certificated service territory, which encompasses approximately 2,100 square miles in Pennsylvania. PECO owns approximately 1,050 miles of transmission lines, approximately 13,000 miles of aerial distribution facilities, and approximately 9,000 miles of underground distribution facilities. In addition, PECO owns approximately 13,800 miles of natural gas mains and services. LON, ¶ 4.

9. In a letter dated July 25, 2025, the PaPUC acknowledged the filing of the LON and advised PECO that it will be advised of any further necessary procedure.

## **III. Standards for Intervention**

10. Eligibility to intervene in PaPUC proceedings is governed by 52 Pa. Code § 5.72, which provides in relevant part that "[a] petition to intervene may be filed by a person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate to the administration of the statute under which the proceeding is brought." 52 Pa. Code § 5.72(a). Section 5.72 further provides that the right or interest may be one "which may be directly affected,

and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding.” 52 Pa. Code. § 5.72(a)(2).

#### **IV. Reasons for Intervention**

11. Both Transource PA’s Bramah Substation and the proposed PECO 5034 Line relate broadly to the same transmission projects directed by PJM Interconnection, L.L.C. (“PJM”). Both the Project at issue in the LON and Transource PA’s Bramah Substation were borne out of the same PJM process to in part ensure regional electric reliability. Both Transource PA and PECO were selected to construct different but related projects as part of this PJM process. As noted above, PECO’s 5034 Line when constructed will interconnect with the Bramah Substation to be constructed and operated by Transource.

12. Transource PA requests to intervene in this proceeding to protect its interests in the event any issues arise that could be adverse to its ability to coordinate with PECO in interconnecting Transource PA’s facilities to a point of interconnection with PECO’s transmission lines and to otherwise assure there is no confusion or inconsistency between the facilities to be constructed and sited by Transource PA and PECO at or near the Bramah Substation.

13. For the reasons noted above, Transource PA has a substantial, immediate and direct interest in the relief granted in this proceeding in order to, among other things, ensure there is no confusion or inconsistency between PECO’s 5034 Line coming into the Bramah Substation and the facilities to be constructed and operated by Transource PA to facilitate the interconnection of that line to the Bramah Substation. Therefore, not only will Transource PA be directly affected by the outcome of this proceeding, but its interest is also not adequately protected by other participants in this proceeding.

**WHEREFORE**, Transource PA respectfully requests that the PaPUC grant this Petition to Intervene and any other relief that is deemed to be just, reasonable and appropriate under the circumstances.

Respectfully submitted,

Date: August 21, 2025

  
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*Counsel for Transource Pennsylvania, LLC*

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Pennsylvania :

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of § 1.54 (relating to service by a party).

Darryl A. Lawrence  
Office of Consumer Advocate  
555 Walnut Street  
Forum Place – 5th Floor  
Harrisburg, PA 17101-1921

Allison C. Kaster  
Bureau of Investigation and Enforcement  
PA Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor West  
Harrisburg, PA 17120

NazAarah Sabree  
Office of Small Business Advocate  
555 Walnut Street  
Forum Place – 1st Floor  
Harrisburg, PA 17101

York County Commissioners  
28 East Market Street – 2nd Floor  
York, PA 17401  
Attn: Julie Wheeler, President Commissioner

York County Planning Commission  
York County Administrative Center  
28 E Market Street, 3rd Floor  
York, PA 17401  
Attn: Wade Gobrecht, Director

Jonelle Harter Eshbach, Esq.  
York County Solicitor  
Administrative Center  
28 East Market Street  
York, PA 17401

Craig S. Sharnetzka, Esq.  
Peach Bottom Township Solicitor  
CGA Law Firm  
135 North George Street  
York, PA 17401

Peach Bottom Township  
6880 Delta Road, Suite 3  
Delta, PA 17314  
Attn: David E. Gemmill, Chairperson

PA Department of Environmental Protection  
Market Street State Office Building  
P.O. Box 2063  
Harrisburg, PA 17105-2063  
Attn: Office of Field Operations

The Department of Environmental Resources  
101 S. Second Street  
P.O. Box 2357  
Harrisburg, PA 17120  
Attn: Bureau of Environmental Planning

PA Department of Transportation  
Commonwealth Keystone Building  
400 North Street, 5th Floor  
Harrisburg, PA 17120  
Attn: Jeffery Spotts, Chief Counsel

PA Historical & Museum Commission  
Bureau for Historic Preservation  
Commonwealth Keystone Building, 2nd Fl.  
400 North Street  
Harrisburg, PA 17120-0053  
Attn: Andrea MacDonald, Bureau Director

York County Conservation District  
2401 Pleasant Valley Road  
Suite #101 RM #139,  
York, PA 17402  
Attn: Eric Jordan, Program Manager

U.S. Fish and Wildlife Service  
Pennsylvania Field Office  
110 Radnor Rd, Suite 101  
State College, PA 16801-4850  
Attn: Lesa Lindsay, Administrative Officer

Federal Aviation Administration  
Eastern Obstruction Evaluation  
10101 Hillwood Parkway  
Fort Worth, TX 76177

PA Department of Conservation & Natural Resources  
Rachel Carson State Office Building  
400 Market St.  
Harrisburg, PA 17105-8767  
Attn: Rebecca Bowen, Conservation Science and  
Ecological Services Division Chief

PA Fish and Boat Commission  
Natural Diversity Section  
450 Robinson Lane  
Bellefonte, PA 16823-9620  
Attn: Christopher A. Urban, Chief

PA Game Commission  
2001 Elmerton Avenue  
Harrisburg, PA 17110-9797  
Attn: Dr. Matthew Schnupp, Director

U.S. Army Corps of Engineers  
Baltimore District Corporate  
Communication Office  
2 Hopkins Plaza  
Baltimore, Maryland 21201  
Attn: Planning Division

PA Department of Agriculture  
2301 N. Cameron St.  
Harrisburg, PA 17110  
Attn: Stephanie Zimmerman,  
Bureau of Farmland Preservation Director

Grimmel Farms LP  
3855 Federal Hill Rd  
Jarrettsville, MD 21084

Calpine Corporation  
401 West A Street Suite 500  
San Diego, CA 92101  
Attn: Andrew Novotny, President

Troyer Farms LLC  
17905 Troyer Rd  
White Hall, MD 21161-9456

Kenneth M. Kulak, Esquire  
Morgan Lewis & Bockius, LLP  
2222 Market Street  
Philadelphia, PA 19103-2921  
*Counsel for PECO Energy Company*

Date: August 21, 2025

  
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John F. Povilaitis