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January 23, 2026

Via E-Filing
Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: Letter of Notification of Transource Pennsylvania, LLC, Filed Pursuant To 52 Pa. Code Chapter 57 Subchapter G, For Approval To Site Seven Substation Cut-In Lines From the Bramah Substation to Points of Interconnection in Peach Bottom Township, York County, Pennsylvania
Docket No. A-2026-

Dear Secretary Homsher:

Enclosed please find Transource Pennsylvania, LLC ("Transource PA")'s Letter of Notification ("LON") in the above-captioned matter. Please note that the applicable filing fee of $350.00 was paid upon e-filing the same.

Copies of this LON are being served on the Parties listed in the attached Certificate of Service. Please contact the undersigned if you have any questions or concerns. Thank you for your attention to this matter.

Very truly yours,

John F. Povilaitis
Counsel for Transource Pennsylvania, LLC

JFP/psm
cc: Certificate of Service

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Letter of Notification of Transource Pennsylvania, LLC, Filed Pursuant To 52 Pa. Code Chapter 57 Subchapter G, For Approval To Site Seven Substation Cut-In Lines From the Bramah Substation to Points of Interconnection in Peach Bottom Township, York County, Pennsylvania	:	Docket No. A-2026-_____

LETTER OF NOTIFICATION OF TRANSOURCE PENNSYLVANIA, LLC

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Transource Pennsylvania, LLC ("Transource PA") hereby files this Letter of Notification ("LON") pursuant to Section 57.72(d)(1)(vi) of the Pennsylvania Public Utility Commission's ("Commission" or "PUC") regulations[1] to construct seven aerial lines extending from the previously-approved Transource PA Bramah Substation to points of interconnection ("POI") with seven nearby PECO Energy Company ("PECO") high-voltage transmission lines and transmission line structures called "Cut-In" lines (the "Project").

The Project involves the interconnection of various high voltage transmission lines to be sited and constructed by PECO to a high volage electric substation being built by Transource PA.

The Project will be constructed in Peach Bottom Township, York County, Pennsylvania. Transource PA previously provided information regarding the Bramah Substation and its Cut-In lines to all identified relevant political subdivisions. Four of the seven proposed aerial cut-in lines will require right-of-way easements located on one landowner's property and adjacent to PECO's

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[1] 52 Pa. Code § 57.72(d)(1)(vi).

existing high-voltage transmission line rights-of-way. Three aerial cut-in lines will be constructed on property owned by Transource PA. Construction of the Project will commence after the Commission's approval of this filing in a final and unappealable order, with an estimated construction start date in August 2027 in support of an initial anticipated in-service date of the Fall of 2027.[2] The total estimated cost of the Project, as described below, is approximately $5 million, and the cost for the Project will be paid by Transource PA. Given PJM Interconnection, L.L.C.'s ("PJM")[3] expectation of when the first interconnection will be achieved, Transource PA is seeking the Commission's approval of this LON by no later than June 2026.

In support thereof, Transource PA states as follows:

I. INTRODUCTION

1. This LON is filed by Transource PA, a public utility certificated to provide electric transmission service in Peach Bottom Township, York County, Pennsylvania. In an order entered by the Commission on December 19, 2024 in *Application of Transource Pennsylvania, LLC for Approval to Offer, Render, Furnish, or Supply Electric Transmission Service to the Public in the Commonwealth of Pennsylvania*, Docket No. A-2024-3049272 ("CPC Order"), the Commission granted Transource PA a certificate of pubic convenience ("CPC") to begin to offer, render, furnish, or supply electric transmission service to the public in Peach Bottom Township, York County, Pennsylvania pursuant to 66 Pa. C.S. Section 1102(a)(1)(i).

[2] Construction of the seven Cut-In lines will occur over a multi-year period. The initial in-service date is associated with the estimate of when the first interconnecting line will be completed and energized.

[3] PJM is a regional transmission organization ("RTO") that coordinates the movement of wholesale electricity in all or parts of 13 states and the District of Columbia. https://www.pjm.com/about-pjm.

2. Transource PA's address is as follows:

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

3. Transource PA's attorneys are:

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Transource PA's attorneys are authorized to receive all notices and communications regarding this LON.

4. 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.

5. Transource PA is a "public utility" as defined in Section 102 of the Pennsylvania Public Utility Code, 66 Pa.C.S. § 102 and was formed to construct, own, operate and maintain transmission facilities within Pennsylvania.

6. As noted in the CPC Order, Transource PA was selected via a competitive process to construct a new electric transmission substation, known as the "Bramah Substation", in Peach Bottom Township, York County, Pennsylvania, as part of the larger North Delta Project to meet multiple needs: (1) the reliability requirements associated with the integration of proposed New Jersey wind generation into the PJM system (CPC Order, pp. 3-4) and (2) issues identified in 2023 due to the planned retirement of the Brandon Shores Generating Station in Maryland, changes to generation flow patterns and numerous reliability issues associated with the increased load in the PJM footprint, particularly in the Doubs and Northern Virginia areas, further exacerbating reliability issues in the area of the proposed North Delta Project in Pennsylvania. CPC Order, p. 4. The seven HV Cut-in lines that will interconnect to the Bramah Substation include lines that interconnect with an existing natural gas fired generating unit as well as the Peach Bottom Nuclear Generating Station.

7. The Project's construction is scheduled to begin August 2027 in order to meet the overall required in-service date for the Bramah Substation of the end of 2027.

8. This LON includes the following accompanying Attachments:

- Attachment 1 Need Statement.
- Attachment 2 Engineering Statement.
- Attachment 3 Description of Project Area.
- Attachment 4 Design Criteria and Safety.
- Attachment 5 Landowners and Agencies List.
- Attachment 6 PA Department of Agriculture Opinion Letter.

9. This LON and accompanying Attachments, which are incorporated herein by reference, contain all the information required by 52 Pa. Code § 57.72(d)(4).

II. THE PROJECT

A. NEED FOR THE PROJECT[4]

10. The Project involves the siting and construction by Transource PA of seven overhead aerial Cut-In transmission electric lines necessary to (i) connect high voltage electric lines separately being constructed and sited by PECO[5] to enter and/or exit the Bramah Substation and (ii) have the Bramah Substation in service and operational by the end of 2027. Transource PA will connect the Cut-In lines at the Bramah Substation to the first structure outside the Bramah Substation (i.e., the Point of Interconnection ("POI")), which will be owned by the incumbent transmission line owner PECO, leaving all other transmission line work, including up to and including the POIs, to PECO for completion.[6] Transource PA's construction of the Cut-In lines to the POIs will complete the physical connection of PECO's transmission lines with the Bramah Substation. The need for the Project is explained in greater detail below and in Attachment 1 – Need Statement.

11. The Project addresses the interconnection of PECO's high voltage transmission lines into and out of the Bramah Substation in a cost-efficient manner and is the lowest cost option.

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[4]This LON provides additional background on the "need" for the Cut-In lines in Attachment 1. Transource PA notes that on September 5, 2025, the U.S. Court of Appeals for the Third Circuit issued a decision in *Transource Pennsylvania, LLC v. Steven M. DeFrank, et al.*, Docket No. 24-1045 ("*Transource Case*"), addressing the interdependence between federal and state determinations concerning interstate transmission projects. Although the present case is unrelated to the *Transource Case*, Transource PA nevertheless reserves its rights on the issue of need relative to PJM awarded projects.

[5] PECO's purchase of a line from Calpine Mid Merit LLC ("Calpine") has been approved by the Federal Energy Regulatory Commission. *See* Calpine Mid Merit LLC and PECO Energy Company, 192 FERC ¶ 61,043 (2025) and, in an order entered October 23, 2025, the Commission approved PECO's acquisition of associated easements from Calpine. *See* Application of PECO Energy Company for a Certificate of Public Convenience under Section 1102(a)(3) and 1103 of the Public Utility Code for Acquisition of Property Rights, Docket No. A-2025-3055493 (Application filed June 2, 2025).

[6] Transource PA's ownership of the Cut-In lines extending from the Substation to PECO's POIs will allow Transource PA to limit access by other parties to the interior of the Substation. This enhances the security of the Substation.

The Cut-In lines are short in length and will connect the Commission-approved Bramah Substation to the PECO structures at seven POIs, whose locations have also been approved by the Commission in Orders entered on August 28, 2025 in *Application of PECO Energy Company Filed Pursuant to 52 Pa. Code §§ 57.71 et seq. for Approval of the PJM 2022 Reliability Window #3 Project Located in Peach Bottom Township, York County, Pennsylvania and Petition for Waiver of 52 Pa. Code § 57.72(c)(10)*, Docket No. A-2024-3051463; and *Application of PECO Energy Company for Approval of the Siting and Construction of the Brandon Shores Retirement Mitigation Project Located in Peach Bottom Township, York County, Pennsylvania and Petition for Waiver of 52 Pa. Code § 57.72(c)(10)*, Docket No. A-2024-3051467.[7] The end points of the lines to be constructed are close to each other, fixed in their locations and already approved by the Commission, thus alternative routes for the Cut-In lines are not relevant or necessary. Therefore, and for the reasons more fully explained below, the Commission should approve the Project as proposed.

B. THE PROPOSED PROJECT

12. In order to interconnect with PECO's high voltage transmission lines into and out of the Bramah Substation, Transource PA proposes to construct seven new 500 kV and 230 kV aerial transmission Cut-In lines from the Bramah Substation to the first transmission line structure outside of substation owned by PECO as follows:

1) Approximately 0.11 miles of 230 kV Cut-In from the Bramah Substation to the new PECO-owned 220-93 Bramah – Cooper 230 kV line;

[7] The first of the seven interconnection transmission lines between PECO and the Bramah Substation is the subject of a separate PECO LON filing. *Letter of Notification 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. This LON request was filed July 25, 2025 and was approved by the Commission in an order entered December 18, 2025.

2) Approximately 0.12 miles of 500 kV Cut-In from the Bramah Substation to the new PECO-owned 5042 Bramah – Graceton 500 kV line;

3) Approximately 0.1 miles of 500 kV Cut-In from the Bramah Substation to the new PECO-owned 5047 Bramah – High Ridge 500 kV line;

4) Approximately 0.1 miles of 500 kV Cut-In from the Bramah Substation to the new PECO-owned 5034 Bramah – York 500 kV line.

5) Approximately 0.08 miles of 500 kV Cut-In from the Bramah Substation to the new PECO-owned 5041 Bramah – Peach Bottom South No. 2 500 kV line;

6) Approximately 0.09 miles of 500 kV Cut-In from the Bramah Substation to the new PECO-owned 5012 Bramah – Peach Bottom South No. 1 500 kV line;

7) Approximately 0.12 miles of 500 kV Cut-In from the Bramah Substation to the new PECO-owned 5014 Bramah – Rock Springs 500 kV line;

13. The Project will be constructed in accordance with, and meet, the requirements of current Transource PA Electric standards, and will comply with Good Utility Practice[8], and PJM's minimum planning and design standards.

14. The Project addresses all issues required in a LON and in Attachment 1– Need Statement. The estimated cost of the Project is approximately $5 million, and the cost of the Project will be paid by Transource.[9]

15. There is currently no pending litigation regarding the right of way or environmental matters related to the Project.

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[8] Federal Energy Regulatory Commission ("FERC") Order No. 888 defined "Good Utility Practice" in section 1.14 of the *pro forma* Open Access Transmission Tariff ("OATT") as follows: "Any of the practices, methods and acts engaged in or approved by a significant portion of the electric utility industry during the relevant time period, or any of the practices, methods and acts which, in the exercise of reasonable judgment in light of the facts known at the time the decision was made, could have been expected to accomplish the desired result at a reasonable cost consistent with good business practices, reliability, safety and expedition. *Good Utility Practice is not intended to be limited to the optimum practice, method, or act to the exclusion of all others, but rather to be acceptable practices, methods, or acts generally accepted in the region*." (Emphasis added). *Policy Statement on Matters Related to Bulk Power System Reliability*, Docket No. PL04-5-000 (Order issued April 19, 2004), p. 8.

[9] The estimated cost was developed using averages of recent costs for similar projects and without an in- depth analysis or field investigation. The cost is subject to change as the constructability of the Project, sequence of construction, and other factors that may affect cost are identified and analyzed as the Project progresses.

III. DESCRIPTION OF THE PROJECT AREA

16. The Project construction and related work will take place entirely within property owned in fee simple by Transource PA at the site of the proposed Bramah Substation in Peach Bottom Township, York County, Pennsylvania or on an adjacent parcel over which Transource PA has entered into a Letter of Intent that will facilitate its acquisition of the needed Right of Way ("ROW"). The specific Project Area consists of the Bramah Substation property, the proposed ROW for four of the seven Cut-In lines and the area within 0.25 miles (i.e., 1320 feet) of the proposed Bramah Substation. Attachment 3, Section 2.0.

17. A more detailed description of the transmission line equipment for the Project is set forth in Attachment 2 - Engineering Statement.

18. Each Cut-In line will be located entirely within Transource PA fee-owned property or upon ROW to be obtained from a private landowner of an adjacent parcel under the executed Letter of Intent. Figure 1-2 of Attachment 1 depicts the location of each Cut-In line that will interconnect PECO's facilities to the Bramah Substation.

19. A detailed aerial exhibit of the Project alignment is provided as Figure 3.1 in Attachment 3 – Description of Project Area.

20. The new 500 kV and 230 kV Cut-In lines will be constructed with high-capacity conductors and overhead ground wires, as detailed in Attachment 2, Table 2-1.

IV. HEALTH AND SAFETY

21. The proposed Cut-In lines will not create any unreasonable risk of danger to public health or safety. They will be designed, constructed, operated, and maintained in a manner that

meets or surpasses all applicable National Electrical Safety Code[10] ("NESC") minimum standards and all applicable legal requirements. The design, construction and operation of the Project will meet or exceed the requirements specified in the latest revisions of the NESC and all applicable safety standards established by the Occupational Safety and Health Administration ("OSHA"). Descriptions of the NESC standards, Transource PA design criteria, and Transource PA safety practices are provided in Attachment 4 to this LON.

22. Attachment 4 accompanying this LON confirms that there are no state or federal Electric and Magnetic Field or audible noise requirements or limitations for the Project. An EMF calculation will be performed using PLS-CADD EMF calculator.[11]

23. Transource PA will construct the Project with ground clearances that meet or exceed the NESC 2023 requirements. See Attachment 4, Section 4.5.2. With respect to vertical clearances, Transource PA designs these facilities to meet the NESC rules, plus 4 additional feet of vertical clearance. Similarly, Transource PA adds an additional 4 feet of horizontal clearance beyond the NESC horizontal clearance rules.

V. LAND USE AND ENVIRONMENTAL EVALUATION

24. The proposed Project will be constructed entirely within the Transource PA fee-owned property and/or within ROW immediately adjacent to PECO's existing high-voltage

[10]Published exclusively by the Institute of Electrical and Electronics Engineers ("IEEE") and updated every five years to keep it up-to-date with changes in the industry and technology, the National Electrical Safety Code® (NESC®) sets the ground rules and guidelines for practical safeguarding of utility workers and the public during the installation, operation, and maintenance of electric supply, communication lines and associated equipment. https://standards.ieee.org/products-programs/nesc/

[11]The PLS-CADD EMF calculator is a tool within the PLS-CADD software for calculating and visualizing three-dimensional electric and magnetic fields around overhead power lines, allowing engineers to assess potential exposure and ensure compliance with safety standards by generating field contour maps and 3D models. It accounts for complex factors like multiple circuits, ground surfaces, adjacent lines, and structural members.

transmission lines and the Bramah Substation, to be obtained from one private landowner, Grimmel Farms LP. As described further below, Transource PA has executed a Letter of Intent with Grimmel Farms LP for the purchase of temporary and permanent easements for the Project. The proposed Cut-In lines are aerial only and no proposed Transource PA structures are required. Therefore, it is anticipated that the Project will have minimal incremental impacts on land use in the area.

25. A network of existing access roads or temporary roads will be utilized during construction of the new and rebuilt transmission lines. Use of these access roads for construction will reduce interference with existing uses and minimize land use impacts. A detailed description of the route of each individual interconnecting transmission line/Cut-In component of the Project can be found in Attachment 1.

26. Land uses immediately surrounding the proposed Bramah Substation predominantly consist of agricultural land and forest.

27. No communications towers are located within the Project Area. The Project does not cross any railroads or gas pipelines and none are in the area.

28. The closest active airport to the Project Area is Pembroke Farms, a privately owned facility, located approximately 4.6 miles southeast of the Project. Transource PA does not anticipate any interference with airport or heliport operations since the Project is located in an area where there are existing electrical facilities. However, Transource PA will comply with any applicable requirements of the Federal Aviation Administration and the Pennsylvania Department of Transportation, Bureau of Aviation.

29. The Project will not affect any national parks, state parks, local parks, or natural landmarks.

30. Short stretches of four of the seven Cut-In lines will run over a parcel adjacent to the Bramah Substation property that is owned by Grimmel Farms LP, the majority of which is subject to an Agricultural Security Easement in which both the Commonwealth of Pennsylvania Department of Agriculture ("PADOA") and the United States Department of Agriculture ("USDOA") have an interest, as a result of an agricultural easement established by the property owner in 2014 ("2014 AG Easement").

31. ROWs for electric lines are permitted under the 2014 AG Easement upon compliance with certain requirements

32. Because only short stretches of four of the seven overhead Cut-In lines will be located over those portions of the Grimmel Farms LP Parcel that are subject to the 2014 AG Easement, in Transource PA's view, there will be no encroachment on the 2014 AG Easement by the Project because Transource PA will not be constructing ground structures, there will be no associated earth disturbance, and the Project will have no negative impact on the agricultural viability or uses of the Grimmel Farms LP parcel or its soils, or on the uses of properties or their soils in the surrounding area.

33. Transource PA will be filing shortly a submittal to the USDOA to demonstrate that the agricultural viability and the soil quality of those portions of the Grimmel Farms LP parcel that are subject to the 2014 AG Easement will not be negatively impacted by the Project, with a corresponding request that the USDOA confirm that the Project is permitted by terms of the 2014 AG Easement.

34. On October 8, 2025, the PADOA issued to Transource PA an Opinion Letter concluding that it has no objection to part of the Project running over the portion of the Grimmel

Farms LP property that is subject to the 2014 AG Easement. A copy of the October 8, 2025 PADOA letter is attached hereto as Attachment 6.

35. As noted above, Transource PA has executed a Letter of Intent to obtain a ROW for a portion of the Cut-In lines separate and apart from the 2014 AG easement.

36. Because the Project work is so minimal and generally consistent with existing land uses, no significant impacts to recreational areas are anticipated.

37. Transource PA conducted an online review of the Project Area and surrounding landscape through the Pennsylvania Historical and Museum Commission ("PHMC") State Historic and Archaeological Resource Exchange site. No State Historic Preservation Office ("SHPO") eligible or listed structures and districts are within the Project Area and, therefore, Transource PA anticipates that the Project will have no adverse effect on archaeological or historic architectural resources and no further cultural resource work will be necessary. On July 8, 2025 SHPO concurred in these conclusions.

38. No unique geological, scenic, or natural areas are located within the Project Area, according to the Pennsylvania Department of Conservation and Natural Resources ("DCNR").

39. Erosion and Sedimentation ("E&S") control plans, approvals from the York County Conservation District, and National Pollutant Discharge Elimination System ("NPDES") permits from the Pennsylvania Department of Environmental Protection ("PADEP") are not required because no ground disturbance is anticipated in the Project, which involves aerial transmission line facilities not touching the ground. Impacts to local soil resources are anticipated to be minimal.

40. Transource PA retained an environmental consultant to identify and delineate all waterways and wetlands within the Project Area. Three isolated freshwater emergent wetlands and eight streams were identified in the Project Area. None of these features are crossed by the Project

Area; therefore, no permits regarding crossings or impacts to wetlands and waterways are required from PaDEP and the United States Army Corps of Engineers.

41. The National Flood Hazard Layer for York County, Pennsylvania was obtained through the Federal Emergency Management Agency ("FEMA") Flood Map Service Center website and analyzed for 100-year floodplains and regulatory floodways within the Project Area and surrounding landscape. Based on review of this data, the southern portion of the Project Area crosses a FEMA 100-year floodplain. No streams or rivers are crossed by the Project as indicated by the United States Geological Survey ("USGS") National Hydrology Dataset ("NHD"); however, the identified floodplain appears to be associated with an unnamed tributary ("UNT") of the Susquehanna River, located approximately 0.6 miles to the east.

42. The Project is not located within the 100-year floodplain area. Therefore, no impacts to regulatory floodway areas are anticipated.

43. Transource PA will coordinate with local agencies for regulated floodplain activities where required.

44. Vegetative cover in the Project Area primarily consists of maintained ROW or agricultural cropland. The new ROW area for the 5014 Bramah – Rock Springs 500 kV, 5012 Bramah – Peach Bottom South No. 1 and No. 2 500 kV, and 220-93 Bramah – Cooper 230 kV Cut-In lines will require vegetation clearing. Transource PA will apply its Transmission Forestry Right-of-Way Construction Clearing Guideline" to minimize potential impacts. Minimal vegetation clearing is anticipated for the Project.

45. Based on review of the Natural Heritage Inventories of York County, Pennsylvania, published by The Nature Conservancy in 2004, the Project Area does not cross any Pennsylvania Natural Heritage identified natural areas.

46. A Pennsylvania Natural Diversity Inventory ("PNDI") was run for the Project on October 25, 2024, to assess the potential presence of threatened and endangered species and/or special concern species. The following agencies reviewed the Project: Pennsylvania Game Commission ("PGC"), Pennsylvania Fish and Boat Commission ("PFBC"), DCNR, and United States Fish and Wildlife Service ("USFWS").

47. Transource PA conducted an onsite field investigation in the Project Area in December 2024 to assess suitable habitat for the broad-headed skink, a sensitive concern species. Potential habitat was observed within the limits-of-disturbance ("LOD"). However, the PFBC indicated that the Project is at the northern range of the species, and no positive observations of the species have occurred west of the Susquehanna River in this area. Transource PA's permitting consultant submitted updated plans to the PFBC depicting the amount of tree clearing and grading within the LOD for the Project in January 2025. The PFBC has issued a clearance letter of no adverse impacts, which was received on January 30, 2025.

48. In October 2024, Transource PA conducted a Phase I Bog Turtle Survey for the Project per USFWS guidance. The survey report, which covered areas encompassing the Project Area, was provided to USFWS in November 2024. The Phase I Bog Turtle Survey determined no bog turtle habitat was located in the Project Area. Therefore, no impacts to the bog turtle are anticipated. Transource PA is awaiting USFWS determination that the effects of the Project on the bog turtle are insignificant or discountable.

49. The remaining agencies reported no known impacts to threatened and endangered species and/or special concern species and resources within the Project Area. Therefore, no further consultation with PGC, DCNR, PFBC is required for the Project. Transource PA will continue to consult with USFWS.

50. Section 27, Article I of the Pennsylvania Constitution is known as the Environmental Rights Amendment ("ERA"). The ERA reads as follows:

> The people have a right to clean air, pure water, and to the preservation of the natural, scenic, historic and esthetic values of the environment. Pennsylvania's public natural resources are the common property of all the people, including generations yet to come. As trustee of these resources, the Commonwealth shall conserve and maintain them for the benefit of all the people.

PA. CONST. art. I, § 27.

51. The ERA imposes on the PUC the obligation to consider "the environmental impacts of placing [a building] at [a] proposed location," while also deferring to environmental determinations made by other agencies with primary regulatory jurisdiction over such matters. *See Del-AWARE Unlimited, Inc. v. Pa. Pub. Util. Comm'n*, 513 A.2d 593, 596 (Pa. Cmwlth. 1986).

52. The PUC and its adjudicatory decisions and regulations are subject to the ERA, and all agencies of the Commonwealth are bound by the ERA. *Energy Conservation Council of Pa. v. Pub. Util. Comm'n*, 25 A.3d 440, 446-47 (Pa. Cmwlth. 2011) ("Any decision by the [Commission] as to the environmental impact [of a public utility project] must be set against the backdrop of [the ERA]."); *Pennsylvania Environmental Defense Foundation v. Commonwealth of Pennsylvania*, 161 A.3d 911 (Pa. 2017).

53. The PUC has recognized and acknowledged its obligation to assess the environmental impacts of its decisions in the context of Transource PA's previous filing with the PUC at Docket No. P-2024-3049273 for an exemption from local zoning regulation in connection with the construction of a control building at the Bramah Substation:

> Transource PA's Zoning Petition was unprotested, and the Petition and the manner in which it was filed conform to the requirements of 52 Pa. Code §5.41, 53 P.S. §10619, and the Environmental Rights Amendment, or Article I, Section 27, of the Pennsylvania

> Constitution. [footnote omitted]. The substation will help to address the State of New Jersey's public policy need pursuant to the SAA process as well as the reliability needs identified by PJM, and the control building is necessary to properly operate the substation. Moreover, in our review, done consistent with our responsibilities set forth in *Marple Twp.,* we do not have any concerns at this time that the control building will have an adverse impact on the environment.

Petition of Transource Pennsylvania, LLC for Confirmation of an Exemption from Local Zoning Regulation and for the Construction of Buildings in connection with the construction of a proposed Substation in Peach Bottom Township, York County, Commonwealth of Pennsylvania, Docket No P-2024-3049273 (Order entered April 24, 2025), at 11.

54. Based on the representations contained in this LON and the detailed environmental studies and analyses conducted by Transource PA and its consultants attached hereto, the Project will not have an adverse impact on the environment, and Transource PA requests that the PUC make such finding in discharging its obligations under the ERA in its final order in this proceeding.

VI. NOTICE

55. Transource PA provided information regarding the Project to representatives of Peach Bottom Township, York County and the York County Planning Commission when the application for approval of the Bramah Substation was submitted to the Commission.

56. Copies of the LON will be served upon all state agencies, federal agencies, county agencies, municipalities, and landowners in accordance with 52 Pa. Code § 57.72(d)(3). A list of those impacted or potentially impacted by the Project is provided in Attachment 5 – Agency and Landowner List.

VII. LETTER OF NOTIFICATION

57. Transource PA is proceeding by means of a Letter of Notification, instead of a full Siting Application, pursuant to the Commission's regulations at 52 Pa. Code § 57.72(d)(1)(vi).

58. The Project qualifies for use of a LON because each Cut-In line in the Project has a proposed route of two miles or less.

59. This LON is filed on the date set forth below. As provided in 52 Pa. Code § 57.72(d)(5), the Commission will review and, by order, approve or disapprove this LON. If the Commission approves this LON, the proposed Project will be constructed as proposed herein without the formal application process set forth at 52 Pa. Code §§ 57.71, *et seq.*

VIII. CONCLUSION

WHEREFORE, Transource Pennsylvania, LLC respectfully requests that the Pennsylvania Public Utility Commission (i) approve this Letter of Notification and the siting of the proposed Bramah Cut-In lines Project located in Peach Bottom Township, York County, Pennsylvania as described and requested herein; (ii) find the necessity and propriety of the Cut-In lines Project; (iii) find that Transource Pennsylvania, LLC has fully evaluated the proposed environmental impacts of the Cut-In lines Project consistent with applicable Pennsylvania law and (ii) and grant Transource Pennsylvania, LLC such other relief as may be just and reasonable under the circumstances.

Respectfully submitted,

Dated: January 23, 2026

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Attorneys for Transource Pennsylvania, LLC

TRANSOURCE PENNSYLVANIA, LLC

BRAMAH CUT-INS

INTERCONNECTION PROJECT

ATTACHMENT 1

NEED STATEMENT

BRAMAH CUT-INS
INTERCONNECTION PROJECT

TABLE OF CONTENTS

LIST OF FIGURES

1.0 INTRODUCTION

Transource Pennsylvania, LLC (Transource PA) seeks approval from the Pennsylvania Public Utility Commission ("PUC" or "Commission") to construct approximately 0.7 miles of new 500 kV and 230 kV electric transmission lines ("Bramah Cut-Ins Interconnection Project" or "Cut-Ins") in Peach Bottom Township, York County, Pennsylvania to interconnect the approved Bramah 500/230 kV Substation ("Bramah Substation') to the electric grid (the "Bramah 500/230 kV Substation Project. Specifically, Transource PA proposes constructing seven new aerial 500 kV and 230 kV Cut-Ins from inside of the Bramah 500/230 kV Substation to the first PECO Energy Company ("PECO") transmission line structure outside of the substation (i.e., the point of interconnection or "POI") owned by PECO. The Bramah Cut-Ins Interconnection Project does not involve the construction of any structures, but only the aerial lines connecting from Bramah Substation to the POIs. Specifically these include:

1) Approximately 0.11 miles of 230 kV Cut-In from the Bramah Substation to the new PECO-owned 220-93 Bramah – Cooper 230 kV line[1];
2) Approximately 0.12 miles of 500 kV Cut-In from the Bramah Substation to the new PECO-owned 5042 Bramah – Graceton 500 kV line[2];
3) Approximately 0.1 miles of 500 kV Cut-In from the Bramah Substation to the new PECO-owned 5047 Bramah – High Ridge 500 kV line[3];
4) Approximately 0.1 miles of 500 kV Cut-In from the Bramah Substation to the new PECO-owned 5034 Bramah – York 500 kV line[4].
5) Approximately 0.08 miles of 500 kV Cut-In from the Bramah Substation to the new PECO-owned 5041 Bramah – Peach Bottom South No. 2 500 kV line[5];

[1] Pa. PUC Docket No. A-2024-3051467 and P-2025-3053944.

[2] Pa. PUC Docket No. A-2024-3051467 and P-2025-3053944 and A-2024-3051463 (Application approved August 28, 2025).

[3] Pa. PUC Docket No. A-2024-3051463 (Application approved August 28, 2025).

[4] Pa. PUC Docket No. A-2025-3056499. PECO's purchase of the line from Calpine Mid Merit LLC ("Calpine") has been approved by the Federal Energy Regulatory Commission. *See* Calpine Mid Merit LLC and PECO Energy Company, 192 FERC ¶ 61,043 (2025) and, in an order entered October 23, 2025, the Commission approved PECO's acquisition of associated easements from Calpine. *See* Application of PECO Energy Company for a Certificate of Public Convenience under Section 1102(a)(3) and 1103 of the Public Utility Code for Acquisition of Property Rights, Docket No. A-20253055493 (Application filed June 2, 2025).

[5] Pa. PUC Docket No. A-2024-3051463.

6) Approximately 0.09 miles of 500 kV Cut-In from the Bramah Substation to the new PECO-owned 5012 Bramah – Peach Bottom South No. 1 500 kV line[6];
7) Approximately 0.12 miles of 500 kV Cut-In from the Bramah Substation to the new PECO-owned 5014 Bramah – Rock Springs 500 kV line[7];

Construction of the approved Bramah 500/230 kV Substation Project will begin in early 2026 to support an initial in-service date at the end of 2027. Construction of the first Cut-In for the Bramah Cut-Ins Interconnection Project will begin in August 2027 to support a fall 2027 in-service date.[8] Subject to the Commission's approval, Transource PA will construct, own, operate, and maintain the Cut-Ins connecting to PECO POIs. PECO will construct, own, operate, and maintain all other 500 kV and 230 kV transmission lines, up to and including the POIs for connecting its existing facilities to the Bramah Substation. When completed, the Cut-Ins from the Bramah Substation to the POIs of the various transmission lines will complete the physical connection of those lines with the Bramah Substation. The total estimated cost of the Bramah Cut-Ins Interconnection Project, as described below, is approximately $5 million.[9]

[6] Pa. PUC Docket No. A-2024-3051467 and P-2025-3053944 and A-2024-3051463.

[7] Pa. PUC Docket No. A-2025-3056499 (Application filed July 25, 2025).

[8] Construction of the seven Cut-Ins will occur over a multi-year period. The initial in-service date is associated with the estimate of when the first interconnecting line will be completed and energized.

[9] The estimated cost was developed using preliminary engineering and initial field investigations. The estimated cost is subject to change as engineering, constructability analysis of the Project, sequence of construction, and other factors that may affect final costs are identified and analyzed as the Project progresses.

2.0 TRANSMISSION SYSTEM PLANNING PROCESS

In an Order issued February 16, 2021, the Federal Energy Regulatory Commission ("FERC") accepted a State Agreement Approach Study Agreement ("Study Agreement") between PJM Interconnection, L.L.C. ("PJM")[10] and the New Jersey Board of Public Utilities ("NJ BPU"), implementing the State Agreement Approach ("SAA") pursuant to PJM's Amended and Restated Operating Agreement. The SAA is a supplementary transmission planning and cost allocation mechanism through which one or more state governmental entities authorized by their respective states, individually or jointly, may agree voluntarily to be responsible for the allocation of all costs of a proposed transmission expansion or enhancement that addresses state public policy requirements identified or accepted by the state or states in the PJM region.[11] The transmission expansion or enhancement is then reflected in PJM's Regional Transmission Expansion Plan ("RTEP").[12]

In an Order issued April 14, 2022[13], FERC accepted an executed State Agreement Approach Agreement between PJM and NJ BPU ("SAA Agreement") intended to implement the state of New Jersey's public policy to expand the transmission system to accommodate a buildout of 7,500 megawatts ("MW") of offshore wind generation by 2035. A map of the existing system configuration is provided as **Figure 1-1**.

On October 26, 2022, the NJ BPU issued an order on the SAA proposals and selected a portfolio of fifty-two (52) transmission projects ("NJ BPU Order") to address the reliability requirements associated with the integration of offshore wind generation into the PJM system. Transource PA was competitively selected to construct a component of one of those projects, a new transmission substation in Pennsylvania. Transource PA was selected by a competitive process initiated by the NJ BPU, with

[10] PJM is a regional transmission organization ("RTO") that coordinates the movement of wholesale electricity in all or parts of 13 states and the District of Columbia. https://www.pjm.com/about-pjm.

[11] PJM Interconnection, L.L.C., 142 FERC ¶ 61,214, at P 142 (2013) (Compliance Order), order on reh'g (rehearing) and compliance, 147 FERC ¶ 61,128 (2014) (Second Compliance Order), order on reh'g and compliance, 150 FERC ¶ 61,038, order on reh'g and compliance, 151 FERC ¶ 61,250 (2015).

[12] PJM Interconnection, L.L.C., 174 FERC ¶ 61090 (2021).

[13] PJM Interconnection, L.L.C., 179 FERC ¶ 61024 (2022). Subsequently, the state of New Jersey increased its target offshore wind generation to 11,000 MW by 2040. On April 26, 2023, the NJ BPU formally requested that PJM open another competitive proposal window under the State Agreement Approach process to accommodate the State's increased public policy requirement of 11,000 MW by 2040. On February 2, 2024, PJM filed with FERC an executed State Agreement Approach Study Agreement to implement New Jersey's proposed increased offshore wind requirement. PJM Interconnection L.L.C., Docket No. ER24-1187-000.

support from PJM under PJM's FERC-approved SAA, to construct an electric transmission substation, originally known as the North Delta Substation[14] and later changed to the "Bramah Substation," as a baseline upgrade as part of PJM's 2021 RTEP process ("Original Work Scope").[15] Further, the Original Work scope for the Bramah Substation's was expanded by PJM, reemphasizing the importance of and the public need for the Bramah Substation, including to PJM, the region, customers and all other key stakeholders.

The Original Work Scope for the Bramah Substation was expanded by PJM (the "Incremental Scope") in 2023 due to the planned retirement of the Brandon Shores Generating Station in Maryland, changes to generation flow patterns and numerous reliability issues associated with the increased load in the PJM footprint, particularly in the Doubs (Allegheny Power System) and Northern Virginia (Dominion Energy) areas, further exacerbating reliability issues in the area of the proposed North Delta Project in Pennsylvania. The Incremental Scope now includes developing and constructing the Bramah Substation to allow for a 230 kV and several 500 kV electric transmission lines to connect with the new Bramah Substation. Specifically, as in the Original Work Scope, the existing 500 kV generator tie-line from Calpine's York Energy Center will be connected with the Bramah Substation, effectively bisecting an existing transmission line that presently runs to and connects with the Peach Bottom South Substation. An existing 500 kV transmission line operated by Baltimore Gas and Electric ("BGE") in Maryland, and PECO in Pennsylvania will also be connected with the Bramah Substation (i.e., High Ridge – Bramah). BGE and PECO16 will own and operate several 500 kV lines to be connected with the Bramah Substation (i.e., Graceton–Bramah, and two Peach Bottom South Substation – Bramah lines). Another 500 kV transmission line will connect the Rock Springs Substation to the Bramah Substation through the resultant network upgrade, which results from bisecting Calpine's existing generator tie-line that originally terminated at the Peach Bottom South Substation (i.e., Rock Springs 5014, via 5034 to

[14] References to a Pennsylvania "North Delta Substation" by the NJ BPU and PJM in various North Delta Project documents should be considered references to the "Bramah Substation" due to a change in the Substation's name.

[15] PJM's RTEP identifies transmission system upgrades and enhancements to provide for the operational, economic and reliability requirements of PJM customers. PJM's region-wide RTEP approach integrates transmission with generation and load response projects to meet load-serving obligations. The rules and procedures for the RTEP process are set forth in schedule 6 of the PJM Operating Agreement. In accordance with those rules, PJM prepares a plan for the enhancement and expansion of transmission facilities in the PJM region. https://www.pjm.com/planning/rtep-development.

[16] With respect to the Graceton-Bramah line, BGE operates the line in Maryland, and PECO operates the line in Pennsylvania)

Bramah). Finally, a new PECO 230 kV line will connect the Bramah Substation to the existing Cooper Substation (i.e., Cooper – Bramah). The seven HV Cut-In lines that will interconnect to the Bramah Substation include lines that interconnect with an existing natural gas fired generating unit as well as the Peach Bottom Nuclear Generating Station.

3.0 THE NEED FOR THE BRAMAH CUT-INS INTERCONNECTION PROJECT

3.1 Background on Planning Process and Project Need

The Bramah Cut-Ins Interconnection Project is the culmination of various regulatory actions and approvals at the federal and state level that have been underway for over a decade. In Order No. 1000[17], the FERC directed transmission providers to "describe procedures that provide for the consideration of transmission needs driven by Public Policy Requirements in the regional transmission planning processes."[18] In PJM's initial Order No. 1000 compliance filing[19], PJM included the SAA planning mechanism to provide a supplemental process for PJM to consider state public policies in its regional planning process. The SAA process was developed through the collaborative efforts of PJM, PJM stakeholders, and the Organization of PJM States, Inc. ("OPSI").[20]

PJM's existing SAA is a means by which a state (or states) can include its public policy requirements in PJM's transmission planning parameters and voluntarily agree to develop the necessary transmission under PJM's RTEP development process to achieve these state public policy goals, regardless of whether the state-sponsored project is needed to address PJM's required planning criteria specific to reliability, operational performance or market efficiency.[21] The SAA process was designed to allow a state governmental entity (or a group thereof), authorized by their respective state(s), to submit a project that addresses public policy goals identified by such state(s).[22] Costs for transmission projects arising from the SAA process are allocated to the customers of the state utilizing the SAA process. In January 2020, the State of New Jersey formally set forth its state public policy to expand the transmission system to accommodate a buildout of 7,500 MW of offshore wind generation by 2035.[23] On November 18, 2020,

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[17] Transmission Planning and Cost Allocation by Transmission Owning and Operating Public Utilities, Order No. 1000, 136 FERC ¶ 61,051 (2011), order on reh'g, Order No. 1000-A, 139 FERC ¶ 61,132, order on reh'g and clarification, Order No. 1000-B, 141 FERC ¶ 61,044 (2012), aff'd sub nom. S. C. Pub. Serv. Auth. v. FERC, 762 F.3d 41 (D.C. Cir. 2014) ("Order No. 1000").

[18] Order No. 1000 at P 203.

[19] Transmission Planning and Cost Allocation by Transmission Owning and Operating Public Utilities, Docket No. ER13-198-000, Compliance Filing of PJM Interconnection, L.L.C. (Oct. 25, 2012) ("PJM October 2012 Compliance Filing").

[20] OPSI is an inter-governmental organization of utility regulatory agencies of 14 jurisdictions that are wholly or partly in the PJM service area. https://opsi.us/

[21] PJM October 2012 Compliance Filing at 48.

[22] See PJM Operating Agreement, Schedule 6, section 1.5.9.

[23] State of New Jersey, 2019 Energy Master Plan, Pathway to 2050 (2019),https://nj.gov/emp/docs/pdf/2020_NJBPU_EMP.pdf.

the NJ BPU issued an order requesting that PJM, pursuant to the SAA, open a competitive proposal window to solicit transmission proposals to interconnect and ensure deliverability of 7,500 MW of offshore wind generation by 2035.[24] On February 16, 2021, the FERC entered an order ("Study Agreement Order") accepting the Study Agreement between PJM and the NJ BPU to effectuate the NJ BPU's formal request that PJM solicit transmission project proposals under the SAA to integrate New Jersey's planned offshore wind resources.[25]

In accordance with the FERC Study Agreement Order, PJM opened a competitive proposal window on April 15, 2021 and received transmission project proposals until the window closed on September 17, 2021. On April 14, 2022, the FERC accepted Rate Schedule No. 49, which is the SAA Agreement between PJM and the NJ BPU.[26] The SAA Agreement established the process for the review and selection of specific transmission projects, which could be onshore or offshore facilities, to effectuate New Jersey's public policy goals. On October 26, 2022, the NJ BPU Order was issued on the SAA proposals and it selected 52 transmission projects.[27] Transmission system expansion and upgrades in New Jersey and Pennsylvania, including the North Delta Project, are necessary to resolve reliability issues that arise from integrating the new offshore wind generation into the existing grid.

Specifically, as in the Original Work Scope, the existing 500 kV generator tie-line from Calpine's York Energy Center will be connected with the Bramah Substation (i.e., York Energy Center – Bramah), effectively bisecting an existing transmission line that presently runs to and connects with the Peach Bottom South Substation. An existing 500 kV transmission line operated by Baltimore Gas and Electric ("BGE") in Maryland and PECO Energy Company ("PECO") in Pennsylvania will also be connected with the Bramah Substation (i.e., High Ridge – Bramah). BGE and PECO will own and operate several 500 kV lines to be connected with the Bramah Substation (i.e., Graceton [BGE operates the line in Maryland, and PECO operates the line in Pennsylvania] – Bramah, and two Peach Bottom South Substation – Bramah lines). Another 500 kV transmission line will connect the Rock Springs Substation

[24] See PPL Elec. Utils. Corp., 181 FERC ¶ 61,178 at P 4 (citing In the Matter of Offshore Wind Transmission, Order, NJ BPU Docket No. QO20100630, at 7-8 (Nov. 18, 2020)).

[25] PJM Interconnection, L.L.C., 174 FERC ¶ 61,090 (2021).

[26] See SAA Agreement Order, 179 FERC ¶ 61,024.

[27] See NJ BPU, In The Matter Of Declaring Transmission To Support Offshore Wind A Public Policy Of The State Of New Jersey, Docket No. QO20100630 (Oct. 26, 2022).

to the Bramah Substation through the resultant network upgrade[28], which results from bisecting Calpine's existing generator tie-line that originally terminated at the Peach Bottom South Substation (i.e., Rock Springs 5014, via 5034 to Bramah). Finally, a new PECO 230 kV line will connect the Bramah Substation to the existing Cooper Substation (i.e., Cooper – Bramah).

The Bramah Substation, including the Original Work Scope and the Incremental Scope, is considered by PJM to be an "Incremental Multi-Driver Project," and the costs associated with the facility will be assigned using PJM's Incremental Multi-Driver Project cost allocation methodology. Under PJM's Open Access Transmission Tariff and Operating Agreement, a MultiDriver Project is "…a transmission enhancement or expansion that addresses more than one of the following: reliability violations, economic constraints or State Agreement Approach initiatives." See PJM Open Access Tariff, Definitions and the Amended and Restated Operating Agreement of PJM Interconnection, L.L.C., Section 1 Definitions. An "Incremental Multi-Driver Project" is one involving "expanding or enhancing a proposed single driver solution to include one or more additional component(s) to address a combination of reliability, economic and/or public policy drivers…" See PJM Amended and Restated Operating Agreement of PJM Interconnection, L.L.C., Schedule 6, Section 1.5.10(h).

A map of the proposed system alignment is provided as **Figure 1-2**.

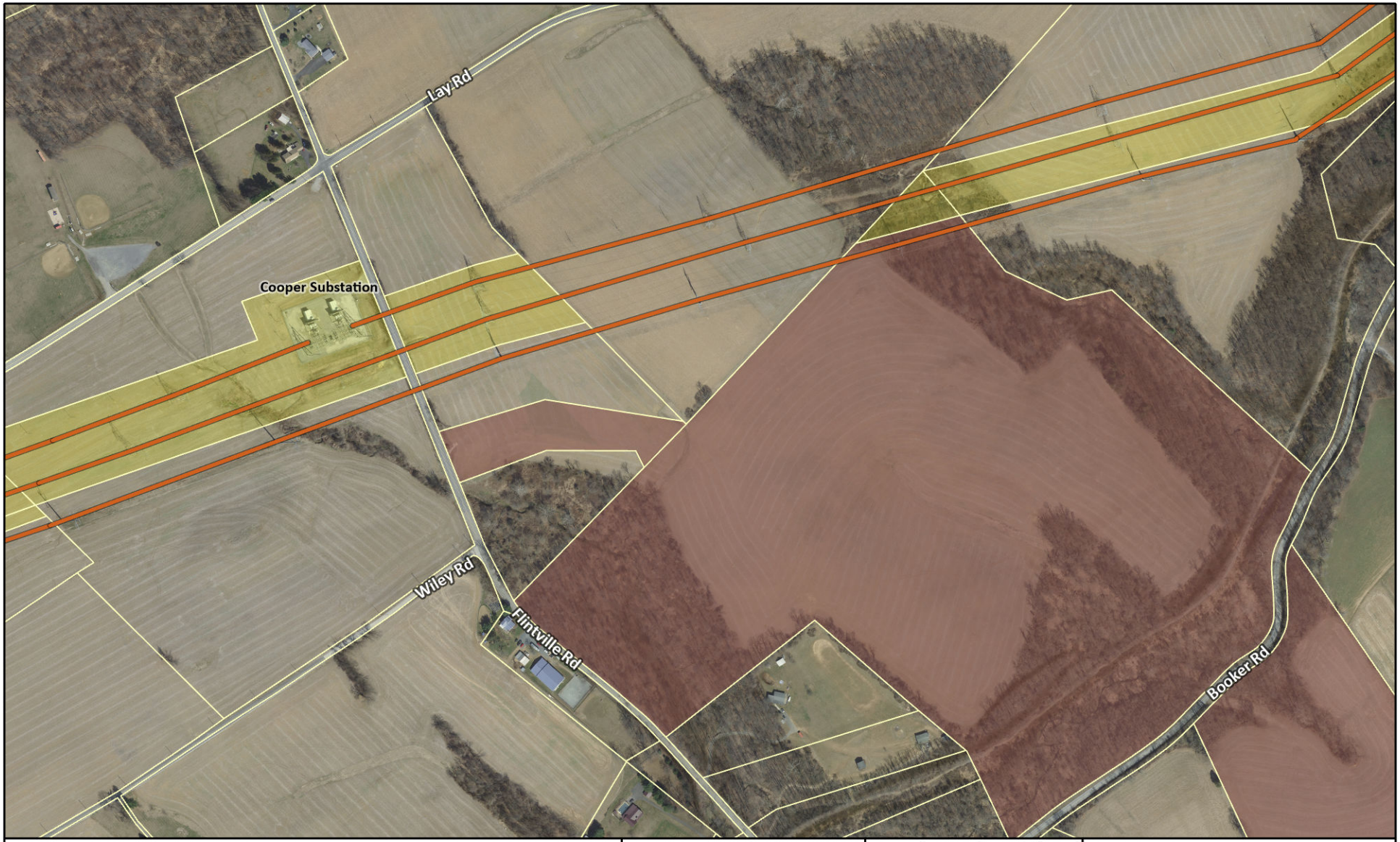
3.2 Bramah Cut-Ins Interconnection Project Impact

The Bramah Substation will assist with the State of New Jersey's SAA offshore wind generation policy objectives, ensure reliability and reduce congestion within the electric transmission system. The Bramah Cut-Ins Interconnection Project was approved by PJM through its RTEP process as a baseline upgrade. A baseline upgrade is a transmission project that results from PJM's annual RTEP process, a robust and transparent planning process regulated by FERC to address regional reliability issues.

As noted above, PJM determined the anticipated retirement of the Brandon Shores Generating Facility further exacerbated reliability issues in the general area of the North Delta Project. PJM's 2023 analysis concluded that the combined injection of New Jersey's offshore wind generation, changes to generation

[28] "Network Upgrades" are modifications or additions to transmission-related facilities that are integrated with and support the overall transmission system for the general benefit of all users of the transmission system. In contrast, a generator tie line is a radial interconnection (i.e., connected to the transmission system through a single point of interconnection) from a generating unit to a network facility.

flow patterns and numerous reliability issues associated with the increased load in the PJM footprint particularly in the Doubs (Allegheny Power Systems) and Northern Virginia (Dominion Energy) areas, required changing the Original Work Scope through additional baseline upgrades, including the interconnection of additional 500 kV lines, to ensure continued reliability for the region. The seven HV Cut-in lines that will interconnect to the Bramah Substation include lines that interconnect with an existing natural gas fired generating unit as well as the Peach Bottom Nuclear Generating Station.



Existing Transmission Line
Parcel Boundary
Transource Parcel
PECO Parcel

Imagery: PEMA 2018-2020

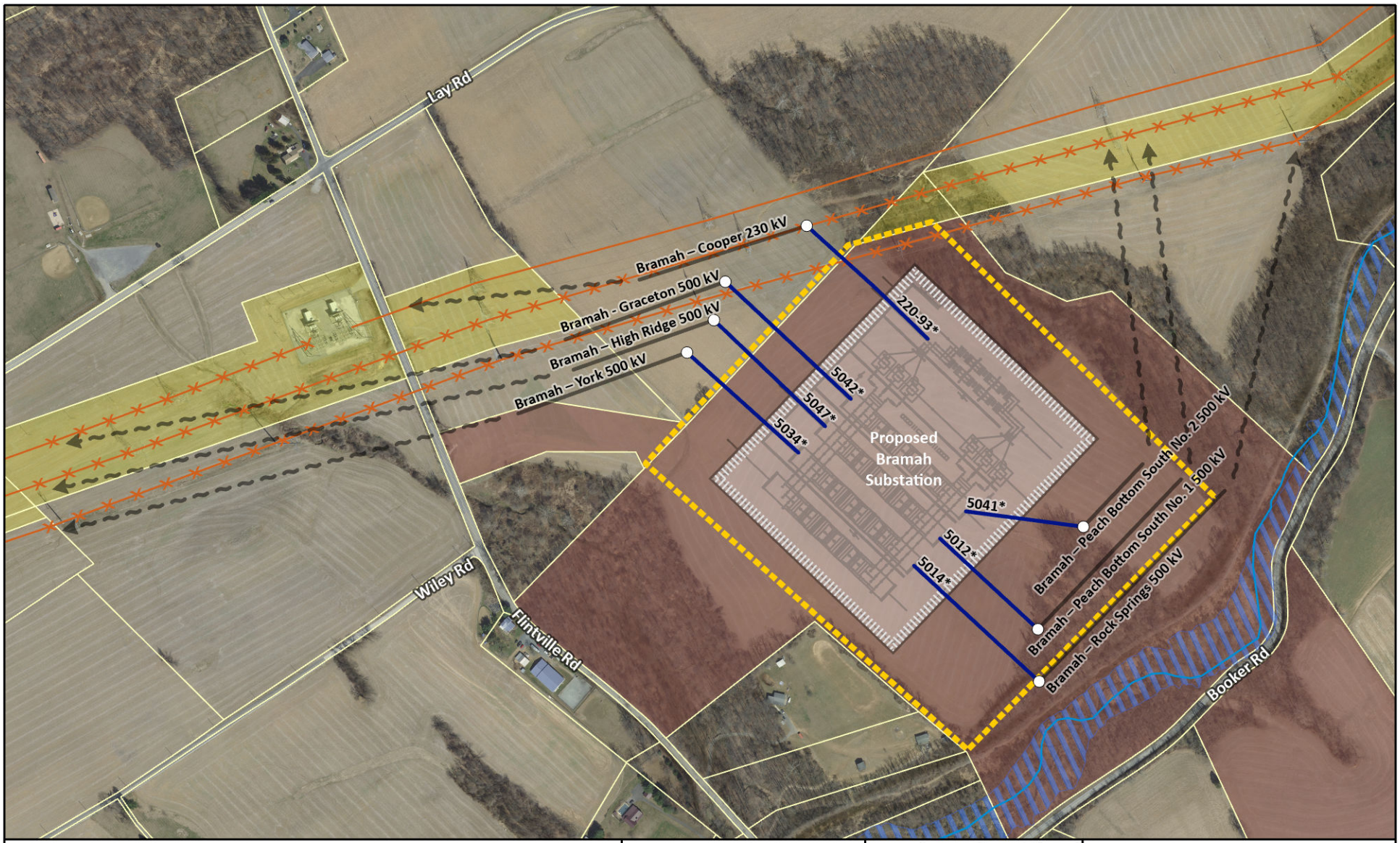
Coordinate System:
State Plane PA South
Datum: North American 1983

December 19, 2025

Figure 2-1
Existing Facilities

TRANSOURCE wsp

0 250 500 Feet



Proposed Incumbent Structure [1]
Proposed Transource Transmission Line
Proposed PECO Transmission Line [1]
Conceptual Route Connection (PECO) [1]
Existing Transmission Line to Remain
Existing Transmission Line to Remove
*Existing and proposed circuit numbers

Proposed Substation Site
Substation Fenceline
Parcel Boundary
PECO Parcel
Transource Parcel
Unnamed Stream
FEMA Floodplain

Imagery: PEMA 2018-2020

[1] Incumbent structures and PECO transmission lines are not a subject of this filing. Conceptual route connections and existing transmission line reconfigurations are approximate.

Coordinate System:
State Plane PA South
Datum: North American 1983

December 19, 2025

Figure 2-2
Proposed Facilities

TRANSOURCE

wsp

0 250 500 Feet

TRANSOURCE PENNSYLVANIA, LLC

BRAMAH CUT-INS
INTERCONNECTION PROJECT

ATTACHMENT 2
ENGINEERING STATEMENT

BRAMAH CUT-INS
INTERCONNECTION PROJECT

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List of Tables

1.0 INTRODUCTION

Transource PA proposes constructing seven new single-circuit 500 kV and 230 kV Cut-Ins from inside of the Bramah 500/230 kV Substation to the POI, i.e., the first transmission line structure outside of the substation owned by PECO. The Bramah Cut-Ins Interconnection Project does not involve the construction of any structures, but only the aerial lines connecting from Bramah Substation to the POIs.

The proposed transmission line Cut-Ins will be designed according to, and generally exceed, all National Electrical Safety Code ("NESC") standards. Design specifications and safety rules adhered to by Transource PA are included as **Attachment 4**.

2.0 DESCRIPTION OF THE PROPOSED LINES

220-93 Bramah – Cooper 230 kV Cut-In

From within the Bramah Substation, the new 220-93 Bramah – Cooper 230 kV Cut-In will extend 0.11 miles northwest to PECO's proposed structure (Structure 1/1). The Cut-In will utilize new conductor and shield wire.

5042 Bramah – Graceton 500 kV Cut-In

From within the Bramah Substation, the new 5042 Bramah – Graceton 500 kV Cut-In will travel northwest for 0.12 miles to PECO's proposed structure (1/1). The Cut-In will utilize new conductor and shield wire.

5047 Bramah – High Ridge 500 kV Cut-In

From within the Bramah Substation, the new 5047 Bramah – High Ridge 500 kV Cut-In will travel 0.1 miles northwest and to PECO's proposed Structure 1/1. None of the existing conductor or guide wires for the existing transmission lines will be replaced.

5034 Bramah – York 500 kV Cut-In

The 5034 Bramah – York 500 kV Cut-In will begin within the Bramah Substation. The Cut-In will extend 0.1 miles northwest to a new structure (Structure 13B), owned by PECO. The Cut-In will utilize new conductor and shield wire.

5041 Bramah – Peach Bottom South No. 2 500 kV Cut-In

From within the Bramah Substation, the new 5041 Bramah – Peach Bottom South No. 2 500 kV Cut-In will extend southeast 0.08 miles to PECO's Structure 2/6. The Cut-In will utilize new conductor and shield wire.

5012 Bramah – Peach Bottom South No. 1 500 kV Cut-In

From within the Bramah Substation, the new 5012 Bramah – Peach Bottom South No. 1 500 kV Cut-In will extend 0.09 miles south to Structure 2/6, which is owned by PECO. The Cut-In will utilize new conductor and shield wire.

5014 Bramah – Rock Springs 500 kV Cut-In

From within the Bramah Substation, the new 5014 Bramah – Rock Springs 500 kV Cut-In will extend 0.12 miles south to a new PECO owned structure (Structure 12B). The Cut-In will utilize new conductor and shield wire.

A detailed aerial exhibit of the Project alignment is provided as **Figure 1-2** in **Attachment 1.** The new 500 kV and 230 kV Cut-Ins will be constructed with new PECO steel monopoles, high-capacity conductors, and overhead ground wires, as detailed in **Table 2-1**. Transource PA is working to finalize all necessary easements for the seven (7) Cut-Ins from Bramah Substation. Transource PA has executed a Letter of Intent with Grimmel Farms to obtain the necessary easements.

The configuration of conductor varies along the circuits due to the varying fiber path taken along each circuit. Transource PA will construct the seven (7) Cut-Ins from the Bramah Substation to PECO's new structures.

Table 2-1. New Cut-In Structure Design Criteria			
Cut-In	**Section Length**	**Conductor**	**Wire Type**
220-93 Bramah – Cooper	0.11 miles	Single bundle 959 kcmil, 22/7 stranding, "Suwannee" ACSS	Two 7#8 Alumoweld overhead ground wires
5042 Bramah – Graceton	0.12 miles	Triple bundle 959 kcmil[1], 22/7 stranding, "Suwannee" ACSS[2]	Two 7#8 Alumoweld overhead ground wires (OHGW)
5047 Bramah – High Ridge	0.1 miles	Triple bundle 959 kcmil[3], 22/7 stranding, "Suwannee" ACSS[4]	Two 7#8 Alumoweld overhead ground wires
5034 Bramah - York	0.1 miles	Double bundle 1590 kcmil, 54/19 "Falcon" ACSR	Two 7#8 Alumoweld overhead ground wires
5041 Bramah – Peach Bottom South No. 2	0.08 miles	Double bundle 2493 kcmil, 54/37 ACAR	Two 7#8 Alumoweld overhead ground wires
5012 Bramah – Peach Bottom South No. 1	0.09 miles	Double bundle 2493 kcmil, 54/37 ACAR[5]	Two 7#8 Alumoweld overhead ground wires
5014 Bramah – Rock Springs	0.12 miles	Double bundle 1590 kcmil, 54/19 "Falcon" ACSR[6]	Two 7#8 Alumoweld overhead ground wires
Total Length	**0.72 miles**		

[1] A kcmil wire size is the equivalent cross sectional area in thousands of circular mils. A circular mil is the area of a circle with a diameter of one thousandth (0.001) of an inch.
[2] Aluminum conductor steel supported.
[3] A kcmil wire size is the equivalent cross sectional area in thousands of circular mils. A circular mil is the area of a circle with a diameter of one thousandth (0.001) of an inch.
[4] Aluminum conductor steel supported.
[5] Aluminum conductor alloy reinforced.
[6] Aluminum conductor steel reinforced.

Table 2-2: Design Minimum Conductor Clearances for 230 kV Single Bundle 959 kcmil 22/17 ACSS "Suwannee"	
Condition	**Design Clearance-to-Ground**
Heavy Ice (1.5" Ice at 0°C ambient temperature)	26.5 feet
Max Operating Temperature (482°F conductor temperature)	26.5 feet
Predicted blowout (6 psf, 60° F ambient temperature)	26.5 feet

Table 2-3: ACSR Conductor Thermal Rating for 230 kV Single Bundle 959 kcmil 22/17 ACSS "Suwannee"				
Condition	**Conductor Temperature °F**	**Ambient Temperature °F**	**Wind Speed ft/sec**	**Ampacity (Amps)**
Summer Normal	482	95	2.93	2259
Summer Emergency	482	95	2.93	2259
Winter Normal	482	35	2.93	2382
Winter Emergency	482	35	2.93	2382

Table 2-4: Design Minimum Conductor Clearances for 500 kV Triple Bundle 959 kcmil 22/17 ACSS "Suwannee"	
Condition	**Design Clearance-to-Ground**
Heavy Ice (1.5" Ice at 0°C ambient temperature)	32.4 feet
Max Operating Temperature (482°F conductor temperature)	32.4 feet
Predicted blowout (6 psf, 60° F ambient temperature)	32.4 feet

Table 2-5: ACSR Conductor Thermal Rating for 500 kV Triple Bundle 959 kcmil 22/17 ACSS "Suwannee"				
Condition	**Conductor Temperature °F**	**Ambient Temperature °F**	**Wind Speed ft/sec**	**Ampacity (Amps)**
Summer Normal	482	95	2.93	6778

Table 2-5: ACSR Conductor Thermal Rating for 500 kV Triple Bundle 959 kcmil 22/17 ACSS "Suwannee"				
Condition	**Conductor Temperature °F**	**Ambient Temperature °F**	**Wind Speed ft/sec**	**Ampacity (Amps)**
Summer Emergency	482	95	2.93	6778
Winter Normal	482	35	2.93	7146
Winter Emergency	482	35	2.93	7146

Table 2-6: Design Minimum Conductor Clearances for 500 kV Double Bundle 1590 kcmil 54/19 stranding ACSR "Falcon"	
Condition	**Design Clearance-to-Ground**
Heavy Ice (1.5" Ice at 0°C ambient temperature)	32.4 feet
Max Operating Temperature (482°F conductor temperature)	32.4 feet
Predicted blowout (6 psf, 60° F ambient temperature)	32.4 feet

Table 2-7: ACSR Conductor Thermal Rating for 500 kV Double Bundle 1590 kcmil 54/19 stranding ACSR "Falcon"				
Condition	**Conductor Temperature °F**	**Ambient Temperature °F**	**Wind Speed ft/sec**	**Ampacity (Amps)**
Summer Normal	203	95	2.93	3250
Summer Emergency	311	95	2.93	4676
Winter Normal	203	35	2.93	4120
Winter Emergency	311	35	2.93	5212

Table 2-8: Design Minimum Conductor Clearances for 500 kV Double Bundle 2493 kcmil 54/37 stranding ACSR	
Condition	**Design Clearance-to-Ground**
Heavy Ice (1.5" Ice at 0°C ambient temperature)	32.4 feet
Max Operating Temperature (482°F conductor temperature)	32.4 feet
Predicted blowout (6 psf, 60° F ambient temperature)	32.4 feet

Table 2-9: ACSR Conductor Thermal Rating for 500 kV Double Bundle 2493 kcmil 54/37 stranding ACSR				
Condition	**Conductor Temperature °F**	**Ambient Temperature °F**	**Wind Speed ft/sec**	**Ampacity (Amps)**
Summer Normal	203	95	2.93	4069
Summer Emergency	239	95	2.93	4806
Winter Normal	203	35	2.93	5168
Winter Emergency	239	35	2.93	5725

TRANSOURCE PENNSYLVANIA, LLC

BRAMAH CUT-INS
INTERCONNECTION PROJECT

ATTACHMENT 3
DESCRIPTION OF PROJECT AREA

BRAMAH CUT-INS
INTERCONNECTION PROJECT

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1.0 INTRODUCTION

The Introduction of **Attachment 1** includes a description of the Bramah Substation Project and the seven new 500 kV and 230 kV Cut-Ins to be constructed by Transource PA, herein the Bramah Cut-Ins Interconnection Project (or the "Project") and the subject of the filing, that will connect the Bramah Substation to PECO transmission lines at POI structures to be constructed by PECO.

2.0 LAND USE

Transource PA evaluated the existing land uses on the proposed Bramah Substation property, within the proposed ROW for the seven cut ins and within 0.25 mile (1,320 feet) of Bramah Substation ("Project Area"). This broader Project Area was reviewed to provide a sense of the landscape in which the Project is located. Based on review of current aerial maps, land use in the Project Area is approximately 70% agricultural/croplands and 30% forest. Minimal vegetation clearing is anticipated and no earth disturbance will occur for the Project.

No communication towers are in the Project Area. The Project does not cross any railroads or gas pipelines and none are in the Project Area. The closest active airport to the Project Area is Pembroke Farms, a privately owned facility, located approximately 4.6 miles southeast of the Project. Transource PA does not anticipate any interference with airport or heliport operations since the Project is located in an area where there are existing electrical facilities. However, Transource PA will comply with any applicable requirements of the Federal Aviation Administration and the Pennsylvania Department of Transportation, Bureau of Aviation.

Conserved Lands

The proposed Project will not affect any national parks, state parks, local parks, or natural landmarks. The Project will run over a small portion of a parcel adjacent to the Bramah Substation property upon which there is a USDA Agricultural Conservation Easement ("AG Easement"). The AG Easement does not prohibit electric transmission lines, there will be no earth disturbance associated with the Project, and the Project will have no impact on the agricultural viability of the land subject to the AG Easement or the soils thereon.

3.0 CULTURAL RESOURCES

An online review of the Project Area and surrounding landscape was conducted through the Pennsylvania Historical and Museum Commission ("PHMC") State Historic and Archaeological Resource Exchange site. No State Historic Preservation Office ("SHPO") eligible or listed structures and districts are within the Project area and therefore, Transource PA anticipates that the Project will have no adverse effect on archaeological or historic architectural resources and no further cultural resource work would be necessary. In their July 8, 2025 responses, the SHPO provided their concurrence.

4.0 NATURAL FEATURES

Unique Natural Features

No unique geological, scenic, or natural areas are located within the Project Area, according to the Pennsylvania Department of Conservation and Natural Resources ("DCNR").

Soils

The Project Area is located on predominantly flat land, primarily surrounded by agricultural land with fragmented forested land uses. Topography within the Project Area ranges between approximately 300 feet to approximately 430 feet above mean sea level ("msl"). Soils present within the Project Area predominantly consist of silt and clay loams, ranging between 3 and 35 percent slopes.

Erosion and Sedimentation ("E&S") control plans, approvals from the York County Conservation District, and National Pollutant Discharge Elimination System ("NPDES") permits from the Pennsylvania Department of Environmental Protection ("PADEP") are not required as there will be no ground disturbance as part of the Project. Impacts to local soil resources are anticipated to be minimal.

Waterways and Wetlands

Transource PA retained an environmental consultant to identify and delineate all waterways and wetlands within the Project Area. Three isolated freshwater emergent (PEM) wetlands and eight streams were identified in the Project Area. None of these features are crossed by the Project; therefore, no permits are required from PADEP or the United States Army Corps of Engineers ("USACE").

100-Year Floodplains and Regulatory Floodway

The National Flood Hazard Layer for York County, Pennsylvania was obtained through the Federal Emergency Management Agency ("FEMA") Flood Map Service Center website and analyzed for 100-year floodplains and regulatory floodway within the Project Area and surrounding landscape. Based on review of this data, the southern portion of the Project Area crosses FEMA 100-year floodplain. No streams or rivers are crossed by the Project as indicated

by the United States Geological Survey (USGS) National Hydrology Dataset (NHD); however, the identified floodplain appear to be associated with an unnamed tributary (UNT) of the Susquehanna River, located approximately 0.6 miles to the east. The Project is not located within the 100-year floodplain area; therefore, no impacts to regulatory floodway areas are anticipated.

Transource PA will coordinate with local agencies for regulated floodplain activities where required.

Vegetation

Vegetative cover in the Project Area primarily consists of maintained ROW or agricultural cropland. The new ROW area for the 5014 Bramah – Rock Springs 500 kV, 5012 Bramah – Peach Bottom South No. 1 and No. 2 500 kV, and 220-93 Bramah – Cooper 230 kV Cut-Ins will require vegetation clearing. Transource PA will apply its Transmission Forestry Right-of-Way Construction Clearing Guideline to minimize potential impacts. Minimal vegetation clearing is anticipated for the Project.

5.0 THREATENED AND ENDANGERED SPECIES

Natural Areas Inventory

Based on review of the Natural Heritage Inventories of York County, Pennsylvania, published by The Nature Conservancy in 2004, the Project Area does not cross any Pennsylvania Natural Heritage identified natural areas. Natural areas identified in these documents generally focus on sites that provide habitat conditions for threatened and endangered plant or animal species.

Threatened and Endangered Species

A Pennsylvania Natural Diversity Inventory (PNDI) was run for the Project on October 25, 2024 to assess the potential presence of threatened and endangered species and/or special concern species. Specific agencies reviewing the Project included the following:

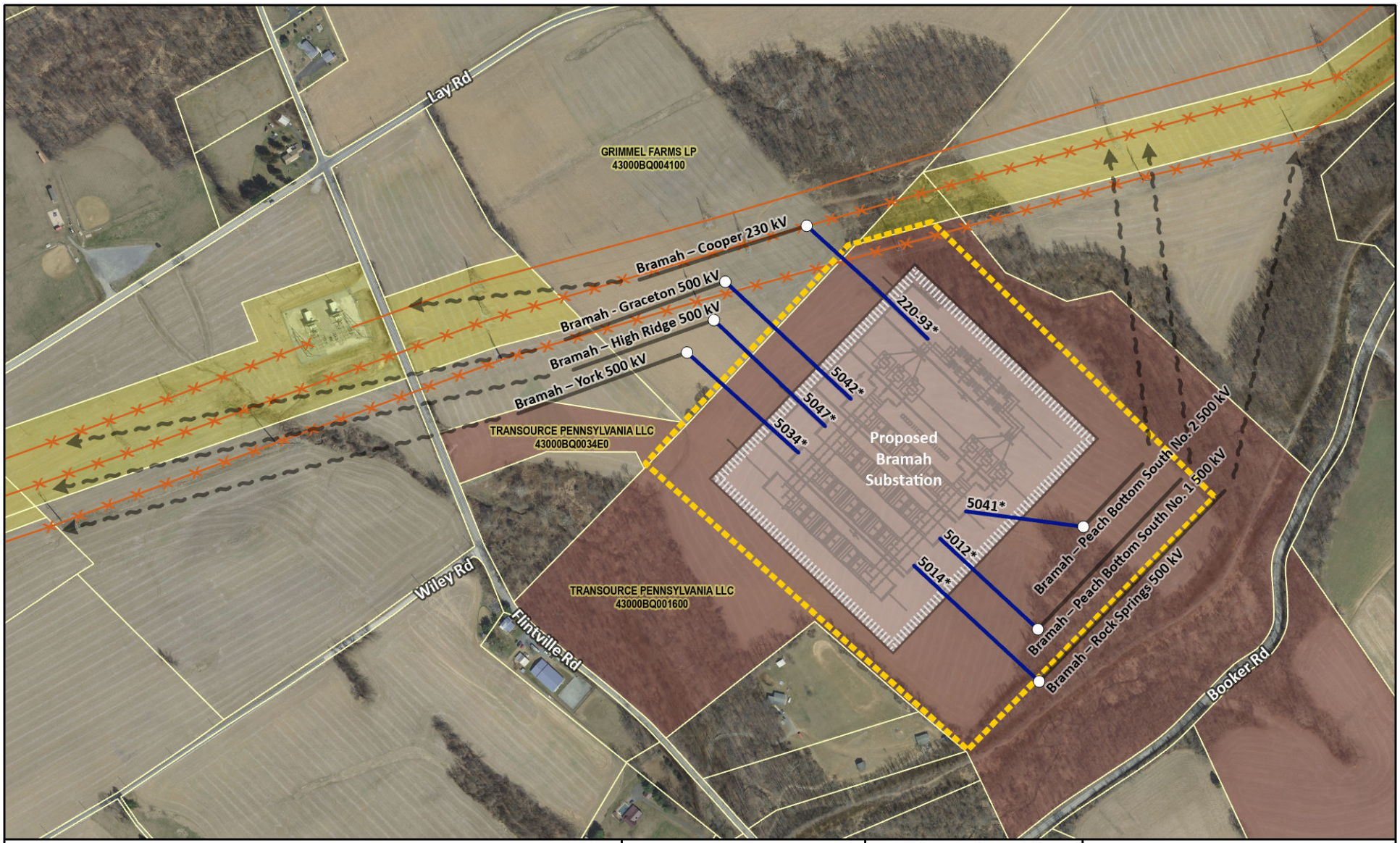
- Pennsylvania Game Commission (PGC),
- Pennsylvania Fish and Boat Commission (PFBC),
- Pennsylvania Department of Conservation and Natural Resources (DCNR), and
- U.S. Fish and Wildlife Service (USFWS).

In December 2024, Transource PA conducted an onsite field investigation in the Project area in December 2024 to assess suitable habitat for the broad-headed skink, a sensitive concern species. Potential habitat was observed within the limits-of-disturbance (LOD); however, PFBC had indicated that the Project is at the northern range of the species and no positive observations of the species have occurred west of the Susquehanna River in this area. Transource's permitting consultant submitted updated plans to PFBC depicting the amount of tree clearing and grading within the LOD for the Project in January 2025. The PFBC issued a clearance letter of no adverse impacts, received on January 30, 2025.

In October 2024, Transource PA conducted a Phase I Bog Turtle Survey for the Project per USFWS guidance. The survey report, which covered areas encompassing the Project Area, was provided to USFWS in November 2024. The Phase I Bog Turtle Survey determined no bog turtle habitat was located in the Project Area; therefore, no impacts to the bog turtle anticipated. Transource is awaiting USFWS determination that the effects of the Project on the bog turtle are insignificant or discountable.

The remaining agencies reported no known impacts to threatened and endangered species and/or special concern species and resources within the Project Area. Therefore, no further consultation with PGC, DCNR, PFBC is required for this Project. Transource will continue to consultant with USFWS.

Transource PA will continue to consult with the applicable jurisdictional agencies regarding potential impacts to protected species. Transource PA will obtain all approvals and permits necessary for the construction of the Project and will comply with any conditions placed on those permits.



Proposed Incumbent Structure [1]
Proposed Transource Transmission Line
Proposed PECO Transmission Line [1]
Conceptual Route Connection (PECO) [1]
Existing Transmission Line to Remain
Existing Transmission Line to Remove
*Existing and proposed circuit numbers

Proposed Substation Site
Substation Fenceline
Parcel Boundary
PECO Parcel
Transource Parcel

Imagery: PEMA 2018-2020

[1] Incumbent structures and PECO transmission lines are not a subject of this filing. Conceptual route connections and existing transmission line reconfigurations are approximate.

Coordinate System:
State Plane PA South
Datum: North American 1983

December 19, 2025

Figure 3-1
Landowner Map

TRANSOURCE

wsp

0 250 500 Feet

TRANSOURCE PENNSYLVANIA, LLC

BRAMAH CUT-INS

INTERCONNECTION PROJECT

ATTACHMENT 4

DESIGN CRITERIA AND SAFETY

BRAMAH CUT-INS
INTERCONNECTION PROJECT

TABLE OF CONTENTS

1. INTRODUCTION

Kiewit, the Project engineering firm, will design the transmission line spans from new Bramah Substation to the first PECO owned transmission Point of Interconnect (POI) structure. These lines consist of six 500kV and one 230kV circuits. TLES-0010-2023 Revision 1 6/6/2025(TLES-10) was used to create this design criteria. In no way is this document intended to replace the requirements in TLES-10. Any conflicts or omissions between this document and TLES-10, TLES-10 shall govern. TLES-10 Engineering Standards for New Transmission and Sub-Transmission Lines is a uniform set of design criteria for strength, clearances, and component application for all new AEP overhead transmission line facilities. All requirements contained in TLES-10 meet or exceed the requirements of the 2023 National Electrical Safety Code (NESC).

1.1 Bramah – Cooper 230kV

The Bramah to Cooper line will consist of new hardware, conductor and shield to string from the Bramah Substation takeoff structure[1] to PECO Str 1/1. One new galvanized steel pole, supported by a concrete drilled pier with full length anchor bolts, will be installed inside the Bramah Substation fence. Bramah Substation to structure 1/1 will consist of the following cables: 1-959.6 kcmil Type 16 Suwannee/ACSS/TW and (2) 7#8 Alumoweld shield wires

1.2 Bramah – Graceton 500kV

The Bramah to Graceton line will consist of new hardware, conductor and shield to string from Bramah Substation takeoff structure to PECO Str 1/1. Bramah Substation to structure 1/1 will consist of the following cables: 3-959.6 kcmil Type 16 Suwannee/ACSS/TW and (2) 7#8 Alumoweld shield wires.

[1] The Bramah Substation takeoff structures are defined as a substation asset within the Bramah Substation.

1.3 Bramah – Peach Bottom South No. 2 500kV

The Bramah to Peach Bottom South line will consist of new hardware, conductor and shield to string from Bramah Substation takeoff structure to PECO Str 2/6. Bramah Substation to structure 2/6 will consist of the following cables: 2-2493 kcmil 54/37 ACAR and (2) 7#8 Alumoweld shield wires.

1.4 Bramah – High Ridge 500kV

The Bramah to High Ridge line will consist of new hardware, conductor and shield to string from Bramah Substation takeoff structure to PECO Str 1/1. Bramah Substation to structure 1/1 will consist of the following cables: 3-959.6 kcmil Type 16 Suwannee/ACSS/TW and (2) 7#8 Alumoweld shield wires.

1.5 Bramah – Peach Bottom South No. 1 500kV

The Bramah to High Ridge line will consist of new hardware, conductor and shield to string from Bramah Substation takeoff structure to PECO Str 2/6. Bramah Substation to structure 2/6 will consist of the following cables: 2-2493 kcmil 54/37 ACAR and (2) 7#8 Alumoweld shield wires.

1.6 Bramah – York 500kV

The Bramah to York line will consist of new hardware, conductor and shield to string from Bramah Substation takeoff structure to PECO Str 13A. Bramah Substation to structure 12A will consist of the following cables: 2-1590 kcmil 54/19 ACSR Falcon and (2) 7#8 Alumoweld shield wires.

1.7 Bramah – Rock Springs 500kV

The Bramah to Rock Springs line will consist of new hardware, conductor and shield to string from Bramah Substation takeoff structure to PECO Str 13B. Bramah Substation to structure 13B will consist of the following cables: 2-1590 kcmile 54/19 ACSR Falcon and (2) 7#8 Alumoweld shield wires.

1.8 Project Description

Summary Information	
Client Name	Transource
Owner Name	Transource PA
Length	0.76 miles
Nominal Voltage	Bramah – Cooper: 230kV Bramah – Graceton: 500kV Bramah – Peach Bottom South No. 2: 500kV Bramah – High Ridge: 500kV Bramah – Peach Bottom South No. 1: 500kV Bramah – York: 500kV Bramah – Rock Springs: 500kV
County, State	York, Pennsylvania
Line Asset Number	Bramah – Cooper (TLN423:01484) Bramah – Graceton (TLN423:01485) Bramah – Peach Bottom South No. 2 (TLN423:01486) Bramah – High Ridge (TLN423:01487)

	Bramah – Peach Bottom South No. 1 (TLN423:01488) Bramah – York 500kV (TLN423:01489) Bramah – Rock Springs 500kV (TLN423:01490)
In Service Date	TBD
Terrain Type	Flat, Rural Terrain
Deadend Configuration	230kV Single Circuit Monopole, Vertical, Drilled Shafts
Soil Conditions	Generally Sandy Silt

1.9 Terrain and Elevation

The elevation along the transmission line routes ranges from approximately 350 to 400 feet above sea level with mostly rural.

1.10 Access Restrictions

Construction access will be along new Transource Right of Way. There are no known access restrictions at this time.

1.11 LiDAR

LiDAR provided by Transource with PLS-CADD Bramah_500kV_Substation_Handoff.bak file.

2. PERMITTING

2.1 FAA

The FAA's notification tool is used to determine if an aeronautical study is required. The FAA notification tool has been run and is complete. As a result, no FAA filings are required for this project.

3. GENERAL OVERVIEW OF THE PROJECT

The proposed transmission alignments are shown in **Figure 3-1, Attachment 3**.

4. ELECTRICAL DESIGN CRITERIA

4.1 Electrical Characteristics

	500kV	230kV
Phase to Phase Voltage	Nominal = 500kV Maximum = 550kV	Nominal = 230kV Maximum = 253kV
Phase to Ground Voltage	Nominal = 289kV Maximum = 318kV	Nominal = 133kV Maximum = 147kV
Max Current	Graceton = 7146 Amps Peach Bottom South No. 2 = 7146 Amps High Ridge = 7146 Amps Peach Bottom South No. 1 = 7146 Amps York = 5226 Amps Rock Springs = 5226 Amps	Cooper = 2382 Amps
Phase Transposition Utilized	No	No

4.2 Weather Cases

4.2.1 NESC District Based Weather Cases

The project is located in National Electric Safety Code (NESC-2023) Heavy zone.

District/Loading Zone

Grade Construction	B
NESC 250B Zone	Heavy: 0°F, 4 PSF Wind, 0.5" Ice, K=0.31
NESC 250C Zone	60°F, 90 MPH Wind, 0.0" Ice
NESC 250D Zone	15°F, 40 MPH Wind, 0.75" Ice
County / State Specific Loading: PJM	See PJM specific structure loading in Section 6.2

4.2.2 Client Based Weather Cases

The project weather cases will meet AEP's TLES-010-2023 Rev0 and PJM Designated Entity Design Standards Task Force Minimum Required Standards Version 2.0.4 Published March 30, 2020.

Minimum Mean Recurrence Interval(MRI) for extreme wind loading 500kV will be 300 year per TLES-010-2023 Rev0 13.6.2.2.

Load Case	Load Case
AEP Combined Ice and Wind(250D)	15°F, 40MPH Wind, 1.0" Ice
AEP Concurrent Extreme Wind	60°F, 105 MPH Wind, 0.0" Ice

- Assume a wire size, type, and phase bundle configuration to model load flows on the system.
- Identify the specific line to rebuild/re-conductor/build.
- Specify the line ratings:
  - Summer Normal (SN)

- Summer Emergency (SE)
- Winter Normal (WN)
- Winter Emergency (WE)

- Identify any considerations apart from thermal limitations, such as impedance
- Identify any RTO or customer considerations such as loss considerations, MVA requirements, cost considerations, reserve capacity
- Determine the cost weighting for cost evaluation of losses, capital costs, maintenance, resilience, and damage failure.
- Incorporate proposed and as-built conductor wire, type, and phase bundle into model of load flows.

Engineer Obligations:

- Meet ampacity requirements for SN, SE, WN, and WE with a conductor size, type, and phase bundle configuration
- Meet criteria from Planner for impedance, losses, and RTO requirements
- Provide a conceptual structure design to estimating and client targeting least total installed cost
- Meet clearance criteria in laws, codes, and client standards for clearance-grade, swing limits, and climbing requirements

- Address EMF, corona, and audible noise limitations for ultra, high voltages of 230 kV and higher

4.3 Conductor and Shield Wire

Circuit	Conductor	Shield Wire
Bramah – Cooper 230kV	1-959.6 kcmil Type 16 ACSS/TW	(2) 7#8 Alumoweld
Bramah – Graceton 500kV	3-959.6 kcmil Type 16 ACSS/TW	(2) 7#8 Alumoweld

Bramah – Peach Bottom South No. 2 500kV	2-2493 kcmil 54/37 ACAR	(2) 7#8 Alumoweld
Bramah – High Ridge 500kV	3-959.6 kcmil Type 16 ACSS/TW	(2) 7#8 Alumoweld
Bramah – Peach Bottom South No. 1 500kV	2-2493 kcmil 54/37 ACAR	(2) 7#8 Alumoweld
Bramah – York 500kV	2-1590 kcmil 54/19 ACSR	(2) 7#8 Alumoweld
Bramah – Rock Springs 500kV	2-1590 kcmil 54/19 ACSR	(2) 7#8 Alumoweld

Selected Cables

Name/ Code Word	Size	Type	Stranding	(Material) Core Type	Core Finish	Outer Layer	Finish
Suwannee ACSS/TW	959.6 kcmil	ACSS/TW Type 16	22/7	Coated Steel	Zinc-5% Aluminum Mischmetal Alloy	1350-O Aluminum	Non-Specular
Falcon ACSR	1590 kcmil	ACSR	54/19	Class A Galvanized Steel	Zinc-5% Aluminum Mischmetal Alloy	Aluminum 1350	Non-Specular

2493 ACAR	2493 kcmil	ACAR	54/37	6201-T81		1350-H19 Aluminum	Non-Specular
7 no. 8 alumoweld	0.375in	Alumoweld	6/1	Aluminum-clad Steel	Aluminum-clad Steel	Aluminum-clad Steel	Aluminum

Cable Properties

Name/Code Word	Rated Breaking Strength (lbs)	Diameter (in)	Area (in^2)	Unit Weight (lb/ 1,000 ft)	Cable File Source	Cable File Name
Suwannee ACSS/TW	30,700	1.108	0.8762	1.317	AEP	suwannee_acss_tw.wir
Falcon ACSR	54,500	1.545	1.407	1.407	AEP	falcon_acsr.wir
2493 ACAR	57,600	1.821	1.9576	2354	Southwire	2493.0 kcmil 54-37 ACAR.wir
7 no. 8 alumoweld	15,930	0.385	0.0908	261.8	AEP	7_No8_alumoweld.wir

Max Operating Temperature

Name/Code Word	Max Operating Temperature

959.6 ACSS/Suwanee	482°F*
1590 ACSR/Falcon	311°F*
2493 ACAR	239°F*
*Per TP-000786	

4.4 Tension Limits

4.4.1 Code Tension Limits

The project tension limits may not exceed the NESC, Client or PJM maximums listed below whichever is more stringent.

Code Tension Limits for All Wires

Wire	Weather Case	Condition	Sag/Tension Limit	Description
All wires	NESC 250B Fig. 250-1 (4#,1/2",0°F)	Final	60% RBS	NESC Limit 261H1a
All Wires	NESC 250C Fig. 250-2 (23.1#,0",60°F)	Final	80% RBS	NESC Limit 261H1a
All Wires	NESC 250D Fig. 250-3	Final	80% RBS	NESC Limit 261H1a

	(2.3#,0.75",15)			
n/a	Cold (0#,0",0deg)	Initial	35% RBS*	NESC Limit 261H1c
n/a	Cold (0#,0",0deg)	Final	25% RBS*	NESC Limit 261H1c
* The rated breaking strength limit called out in NESC Rule 261H1c is only required if tension is the only limiting method used to mitigate any potential Aeolian vibration damage.				

- Fatigue Driven Safe Installed Tension Levels (Southwire 5.18)

NESC Limits:

- Initial tension 35% of RBS at 60 deg F, no ice, no wind
- Final tension 25% of RBS at 60 deg F, no ice, no wind

EPRI Limits (requires dampers)

- Initial tension 32% of RBS at minimum stringing tension
- Creep final tension 24% of RBS at 60 deg F, no ice, no wind
- Final creep tension 27% of RBS at minimum temperature for the area
- Final after load tension 35% maximum load, worst conditions

Conventional Rules of Thumb

- Initial tension 20% of RBS at 60 deg F, no ice, no wind
  - Lower tension limit rarely has a fatigue failure per EPRI field data
- Final after creep tension 15% of RBS 60 deg F, no ice, no wind

4.4.2 Client Tension Limits

The project has tensions from the following AEP standards. AEP Tension Limits for wires as noted below.

Wire	Weather Case	Condition	Sag/Tension Limit	Description
All wires	NESC HV- 4#, 1/2", 0deg	Creep RS	45% RBS	NESC 250B Client TLES-0010-2023, Table 5
All wires	Heavy Ice HV- 0#,1.25",0deg	Creep RS	80% RBS	Extreme Ice Client TLES-0010-2023, Table 5
All wires	ASCE-74 XW- 105mph, 0", 60deg	Creep RS	80% RBS	Extreme Wind Client TLES-0010-2023, Table 5
All wires	NESC HWI- 4#,1",15deg	Creep RS	80% RBS	NESC 250D Client TLES-0010-2023, Table 5
All wires	COLD-0#,0",0deg	Initial RS	33.3% RBS	Aeolian Vibration Limit Client TLES-0010-2023, Table 6
All wires	COLD-0#,0",0deg	Final RS	25% RBS	Aeolian Vibration Limit Client TLES-0010-2023, Table 6
Shield Wire and Optical	Conductor: 0#, 0", 120deg	Final Load	Shield wire sag to be between	Sag limitations of ground wires

Ground Wire (OPGW)	Shield Wire: 0#, 0", 60deg	Final Load	60% and 80% of the conductor sag	(AEP TLES-0010-23, Section 6.3.2, Ground Wires)

4.4.3 Kiewit Standards and Industry Best Practices for Tensions are noted below.

Kiewit Standard Notes

- Kiewit standard for shield wire sag. Historically, the shield wires were installed at 60-80% of the conductor sag using the Initial RS condition at 60 def F, no wind, no ice. (AEP TLES-0010-23, Section 9.4.2, Ground Wires)
- For standard voltages (69 kV – 161 kV), the shielding angle may be 30 degrees at the structure. (AEP TLES-0010-23, Section 9.4.2, Ground Wires)
- For extra-high voltages (230 kV – 500 kV) with structure heights typically 150 ft or more, the shielding angle should be 15 degrees or less. (AEP TLES-0010-23, Section 9.4.2, Ground Wires)
- For 765 kV structures, the shielding angle will be no more than 5 degrees to the outermost phase. (AEP TLES-0010-23, Section 9.4.2, Ground Wires)

4.4.4 Final after Load and Creep

Weather Cases to calculate sag and tension for a cable in the final after creep and the final after load condition. (AEP TLDS-0003-2022, Section 7.6 Creep-Stretch [PLS-7.3.4])

	Wind (psf)	Ice (in)	Temp (°F)
After Load	4	0.5	0
After Creep	0	0	60

4.5 Clearances

4.5.1 Basis for Clearances

Clearances are calculated in accordance with NESC 2023, AEP's TLES-010-2023 and PJM general criteria. Design clearances to be met for design deliverables. As-built line to meet NESC clearances.

4.5.2 Ground Clearances

Clearance above Ground, Roads, Highways, and Railroads at max operating temperature.

AEP Item No.	Nature of surface underneath conductors	500 kV		230kV	
		NESC Clearance	AEP (N_1 + 4ft)	NESC Clearance	AEP (N_1 + 4ft)
1	Spaces and ways subject to pedestrians or restricted traffic only	24.4'	28.4'	18.5'	22.5'
2	Roads, streets, driveways and commercial areas	28.4'	32.4'	22.5'	26.5'
3	Track rails of railroads	36.4'	40.4'	30.5	34.5

Clearance above cultivated fields or farm use roads at 120°F per AEP TLES-010-2023 Appendix B Item 2A and NESC 232C1c.

AEP Item No.	Nature of surface underneath conductors	500 kV		230kV	
		NESC Clearance	AEP (N_3 + 2ft)	NESC Clearance	AEP (N_3 + 2ft)
2A	Electrostatic requirement for cultivated land and for farm roads that are subject to anticipated use by farm vehicles	-	42.0’	-	33.0’

4.5.3 Clearances Between Wires Carried on Different Supporting Structures

Minimum clearances between crossing wires and conductors carried on different supporting structures are based on NESC Rule 233C2 (Table 233-1) and AEP TLES-010-2023. The clearances are to be maintained when upper conductor is at maximum operating temperature or heavy ice, and the lower conductor/wire is at 0°F.

Lower Level Line Voltage (kV)	500 kV		230kV	
	NESC	AEP (N_1 + 4ft)	NESC	AEP (N_1 + 4ft)
Guys, neutrals, shield wires	11.9’	15.9’	6.0’	10.0’
≤ 69 kV	13.3’	17.3’	7.4’	11.4’

230kV conductor	-	-	10.6’	14.6’

4.5.4 Clearances to Substation Bus

Minimum clearances from conductor to substation bus are based on AEP Spec SS-060001 Table 8-1. The clearances are to be maintained when conductor is at maximum operating temperature or heavy ice.

Lower Level Line Voltage (kV)	230kV	
	NESC	AEP (N_1 + 2ft)
230kV Substation Bus	13.8’	15.8’

4.5.5 Wire to Supporting Structure Clearance

Clearance of wires to supporting structure to meet AEP TLES-010-023 Section 12. A 0.5ft buffer will be added to the distances below to account for hardware per Section 12.2.3. Per Section 12.2.4 an additional 0.5ft buffer will be added to account for the grading rings. This results in a total of 1.0ft buffer to be added to the distances in the table below.

Condition	Weather Case	Sag	500kV	230kV
1	0deg, 0”, 0psf	Initial	10.3’	5.5’
2	120deg, 0”, 0psf	Creep	10.3’	5.5’
3	120deg, 0”, 6psf	Creep	9.3’	4.5’
4	0deg, 0” 6psf	Initial	9.3’	4.5’

-	MOT	Creep	9.3’	4.2’

4.6 Galloping

4.6.1 Galloping Ellipses

Galloping to be analyzed per TLES-010-2023 Rev 0 Section 10.2.

Calculation Method	CIGRE Method 322
Ellipse Factor Cable Diameter >= 1.3 in	0.7
Ellipse Factor Cable Diameter < 1.3 in	0.5
Swing Angle	2psf, 0.5”, 32°F
Sag	0psf, 0.5”, 32°F

4.6.2 Galloping Criteria

The galloping criteria to meet both AEP TLES-010-023 Section 10.2 and PJM general criteria section 7.

Transource PA criteria: Galloping ellipse separation

	500kV	230kV
Phase to Phase	6.5’	3.0
Phase to Ground	4.5’	2.5’

4.6.3 Maintenance Clearances

Structures will not be designed for live line maintenance.

5. PRE-ENGINEERED STRUCTURE DESIGNS

5.1 Pre-Engineered Structure Family

A pre-engineered structure is a standardized pre-designed structure. No pre-engineered structures are anticipated on this project.

6. ENGINEERED STRUCTURE DESIGNS

6.1 Engineered Structure Family

An engineered structure is a custom structure designed specifically for the loads. The proposed Bramah to Cooper 230kV line will utilize a 230kV single circuit, monopole deadends. The single pole located inside the Bramah Substation will have a galvanized finish.

The following Standard Engineered structure types are anticipated on this project.

Design Voltage	Description	Applicable Line Angle	Insulator Type
230 kV	Single Circuit, Vertical, Monopole, Dead-End, w/ Jumper Support	0-85°	Non-Ceramic

6.2 Engineered Structure Loading Criteria

All engineered steel structures will be designed to the load cases specified in AEP's TLES-010-2023 Section 13.4.

All dead-end structures will be considered full dead-end structures and will be designed to withstand the greatest mechanical load determined by removing one or more spans on the structure. Full dead-ends shall be installed outside substations. One dead-end structure is required for every 3 miles of the transmission line to prevent cascading failure along the line.

The vertical, transverse, and longitudinal loads for each loading case will be considered to act simultaneously. Vertical loads will include the weight of insulators and hardware. The direction of the wind will be taken to create the greatest load on the structure. The unit wind pressure will be applied to the projected area of the wire and projected area of one face of the structure without ice.

In addition to the AEP TLES-010-023 loading requirements the engineered steel poles will also be designed to the following PJM loading criteria.

Load Case	Weather Case	Cable Condition	Wire Vertical Overload Factor	Wire & Wind Overload Factor	Wire Tension Overload Factor	Str Wind Area Factor
PJM Maintenance	PJM Maintenance	Load RS	1.5	1.5	1.5	1

Loading Case	Load Conditions	Load Factors	Condition Notes
PJM Maintenance	32°F, 2psf, 0”	1.5	250lb point load applied at any point on structure.

6.3 Engineered Structure Deflection Criteria

Design Deflection limits are shown in the table below. The tabulated deflection limits assume zero degree foundation rotation. Deflection load case to be under Everyday loading 0 psf wind, 0” ice, 60°F.

Load Case	Tangent (intact)	Running Angle (Intact)	Dead End (Intact)
All (except Deflection)	10%	10%	10%
Deflection Limit	1.5%	2%	2%

6.4 Engineered Structure Foundation Design

Foundations for the steel pole structures will be designed for the following criteria.

Foundation Design	
Design Concrete Strength	3,500 psi
Actual Concrete Strength	4,000 psi at 28 days
Minimum Cover Reinforcement Clearance	3”
Frost Depth Design Utilized	4’ below groundline
Maximum Aggregate Size	1”
Reinforcing Material (Shear)	ASTM A615 Grade 60
Reinforcing Material (Vertical)	ASTM A615 Grade 60
Anchor Bolts	ASTM A615, 75 ksi 18J
FAD Springs	- Lateral Translational - Rotational - Base Translational - Base Moment
Drilled Pier Reveal	2’
Design Loads	Factored loads will be utilized

	- Load Case 1: Load with maximum moment - Load Case 2: Load with maximum shear
Foundation Diameter Increments	6” increments up to 7’-0”, 1’-0” thereafter
Foundation Slenderness Ratio	3/1 <depth/diameter> 10/1 **Unless competent rock is encountered**
Total Deflection	4”
Total Rotation	2°
Non-Recoverable Deflection	2”
Non-Recoverable Rotation	1°
Factor of Safety	1.1
Anchor Bolt Lengths	Full length anchor bolts will be used.

7. HARDWARE

7.1 Insulation

Toughened glass insulators will be utilized for the 500kV circuits with Corona-Free hardware per TLES-010-2023 Rev 0.

Polymer insulators will be utilized for the 230kV circuits with Corona-Free hardware per TLES-010-2023 Rev 0.

Insulators are to be rated for Heavy Contamination level.

7.2 Dead-End Attachment

Dead- End Attachment Hardware					
Description	Bolted	Compression	Corona- Free Hardware Required	High-Temp Hardware Required	Corona Rings Required
Conductor 230/500kV	-	X	X	X	X
Shield Wire		X	N/A		
OPGW	X				

7.3 Load and Allowable Strength

Hardware and assembly strength will be verified in accordance with the National Electric Safety Code 2023 and AEP's TLES-010-2023.

Load and Allowable Strength factors						
Material	Type	Load Case Description	Load Factor	Strength Factor		
				NESC	AEP	Design
Non Ceramic Insulators	Dead-End & Suspension	NESC 250B	1.00	0.50(1)	0.33(2)	0.33
		NESC 250C & 250D	1.00	0.65(1)	0.65(2)	0.65(3)
		All Non-NESC Cases	1.00	-	0.56(2)	0.56
Porcelain or Toughened Glass Insulators	Dead-End & Suspension	NESC 250B	1.00	0.50(1)	0.40(2)	0.40
		NESC 250C & 250D	1.00	0.65(1)	0.80(2)	0.80(3)
		All Non-NESC Cases	1.00	-	0.80(2)	0.80
Non Ceramic Insulators	Line Post (Cantilever)	NESC 250B	1.00	0.50(1)	0.33(2)	0.33
		NESC 250C & 250D	1.00	0.50(1)	0.50(2)	0.50

		All Non-NESC Cases	1.00	-	0.56[2]	0.56
Hardware for Insulated Assemblies	Dead-End & Suspension	NESC 250B	1.65	1.00[3]	1.00[2]	1.00
		NESC 250C & 250D	1.00	0.80[3]	0.80[2]	0.80
		All Non-NESC Cases	1.00	-	0.80[2]	0.80
Hardware for Uninsulated Assemblies	Dead-End & Suspension	NESC 250B	1.65	1.00[3]	1.00[2]	1.00
		NESC 250C & 250D	1.00	0.80[3]	0.80[2]	0.80
		All Non-NESC Cases	1.00	-	1.00[2]	1.00
Conductors, Groundwires, Dead-End Fittings and Splices	Dead-End & Splices	NESC 250B	1.00	0.60[4]	0.60[2]	0.60
		NESC 250C & 250D	1.00	0.80[4]	0.80[2]	0.80
		All Non-NESC Cases	1.00	0.80[4]	0.80[2]	0.80

Notes:

1. NESC Table 277-1

2. AEP TLES-010-2023 Rev. 0, Appendix B

3. AEP TLES-010-023 Rev. 0, Appendix B 9a Note 4

4. NESC 261.H.2.a

7.4 Vibration Analysis

Vibration analysis and quantities ordered will be designed per AEP's TLES-010-2023 Rev. 0, Section 3.E.

Hi-Mass spiral vibration dampers will be specified and installed for the shield wire in accordance with the manufacturer recommendations.

7.5 Uplift

All structures with dead-end attachments will be designed to the Uplift load case (0˚F,0",0#).

Uplift on suspension hardware under the Uplift load cases are not permitted. If uplift occurs on shield wires at the Uplift load case, the shield wire will be dead-ended only if reasonable solutions cannot be found by adding structure height or counter weights.

8. RIGHT-OF-WAY

8.1 Right-Of-Way Requirements

The minimum clearances that will be used for the purposes of checking conductor blowout, will be measured from the blown-out conductor to the edge of right-of-way and will be based on the NESC required clearance to roofs or projections readily accessible to pedestrians (see NESC 234C1 Table 341-1 Case 2a(1)).

Weather Case	500 kV Clearance to Edge of Right-Of-Way (ft)	230 kV Clearance to Edge of Right-Of-Way (ft)
120°F, 0”, 6#	30	23.0
60°F, 0”, 6#	16.4	10.5
60°F, 0”, 105mph	5.0	3.0

9. Optic Ground Wire (OPGW)

This project does not contain any OPGW.

All OPGW for each circuit is to be transition from overhead to underground at the first structure outside new Bramah Substation fence. AEP Telecom to run underground fiber from structures to Bramah Substation fence.

10. DISTRIBUTION/ADSS UNDERBUILD DESIGN

This project does not contain any distribution or ADSS fiber underbuild.

11. EMF AND AUDIBLE NOISE

There are no state or federal Electric and Magnetic Field (EMF) or audible noise requirements or limitations for this project. An EMF calculation will be performed using PLS-CADD EMF calculator.

12. INSULATION COORDINATION

Insulators properties to meet TLES 010-2023 Rev0.

13. LIGHTNING AND GROUNDING

All transmission structures will be individually grounded through a dedicated earth driven grounding system composed of ground rods and / or buried counterpoise. This system is to be measured on each individual structure prior to the installation of any overhead conductors or wires. In accordance with NEC Article 250.53, IEEE 142 Section 4.1.3, and standard industry practices, the maximum acceptable resistance measurement of this grounding system is 15 ohms. The grounding system may include radial counterpoise wires, equipotential rings, or both. These resistance requirements are to assure acceptable lightning performance on the line as well as provide for the safe grounding of the line by construction and maintenance forces.

Individual structure grounding measurements will be allowed to exceed the 15 ohms required only if the average value for the structure itself and the adjacent structures along the line do not exceed 15 ohms.

To assure acceptable lightning performance, a shield wire is required above each transmission line, and shall conform to the requirements in the table below when displayed at 60°F, 0" ice, 0 psf wind Final condition:

	500kV	230kV
Maximum Shielding Angle	15 Degrees	15 Degrees

A lightning and protection performance study was performed for this project.

TRANSOURCE PENNSYLVANIA, LLC

BRAMAH CUT-INS
INTERCONNECTION PROJECT

ATTACHMENT 5
LANDOWNERS AND AGENCIES LIST

BRAMAH CUT-INS
INTERCONNECTION PROJECT

Federal Agencies

United State Department of Agriculture
Natural Resource Conservation Service
359 East Park Drive, Suite 2
Harrisburg, PA 17111
Attn: Denise Coleman

U.S. Army Corps of Engineers
Baltimore District
2 Hopkins Plaza
Baltimore, Maryland 21201
Attn: Public Affairs Office

U.S. Fish and Wildlife Service
Pennsylvania Field Office
110 Radnor Road, Suite 101
State College, Pennsylvania 16801
Attn: Lesa Lindsay

State Agencies

Pennsylvania Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building 400 North Street
2nd Floor, Room-N201 Harrisburg, Pennsylvania 17120
Attn: Allison Kaster

Pennsylvania Department of Agriculture
Bureau of Farmland Preservation
2301 North Cameron Street
Harrisburg, PA 17110
Attn: Stephanie Zimmerman

Pennsylvania Department of Environmental Protection
400 Market Street
10th Floor Rachel Carson State Office Building
Harrisburg, Pennsylvania 17101
Attn: Regional Permit Coordination Office

Pennsylvania Department of Transportation
Keystone Building
400 North Street, Fifth Floor
Harrisburg, Pennsylvania 17120
Attn: Jeffrey Spotts, Chief Counsel

Pennsylvania Historical and Museum
Commission Bureau for Historic Preservation Commonwealth
Keystone Building, Second Floor
400 North Street
Harrisburg, Pennsylvania 17120-0093
Attn: Ms. Emma Diehl, Division Manager

Pennsylvania Department of Conservation and Natural Resources
Rachel Carson State Office Building
400 Market Street
Harrisburg, Pennsylvania 17105-8767
Attn: Rebecca Bowen, Ecological Services Section Chief

Pennsylvania Game Commission
2001 Elmerton Avenue
Harrisburg, Pennsylvania 17110-9797
Attn: David J. Gustafson, Director, Bureau of Wildlife Habitat Management

Pennsylvania Fish and Boat Commission
Centre Region Office
595 East Rolling Ridge Drive
Bellefonte, Pennsylvania 16823-9620
Attn: Christopher A. Urban, Chief, Natural Diversity Section

Pennsylvania Office of Consumer Advocate
555 Walnut Street 5th Floor Forum Place
Harrisburg, Pennsylvania 17101-1923
Attn: Darryl A. Lawrence, Interim Acting Consumer Advocate

Pennsylvania Office of Small Business Advocate
555 Walnut Street, 1st Floor Forum Place
Harrisburg, Pennsylvania 17101
Attn: Steven C. Gray, Senior Supervising Assistant Small Business Advocate

County Agencies

York County Conservation District
2401 Pleasant Valley Rd Suite #101 Room #139
York, PA 17402
Attn: Jeff Hill, District Manager

York County Planning Commission
28 E Market Street, 3rd Floor
York, PA 17401
Attn: Mike Pritchard, Director

York County Commissioners
28 E Market Street
York, PA 17401
Attn: Julie Wheeler, President

Municipalities

Peach Bottom Township Supervisors
6880 Delta Road, Suite 3
Delta, PA 17314
Attn: David Gemmill, Chair

Landowner

Grimmel Farms, LP
3855 Federal Hill Rd
Jarrettsville, MD 21084-1527

TRANSOURCE PENNSYLVANIA, LLC

BRAMAH CUT-INS
INTERCONNECTION PROJECT

ATTACHMENT 6
PA DEPARTMENT OF
AGRICULTURE OPINION LETTER

pennsylvania
DEPARTMENT OF AGRICULTURE

BUREAU OF FARMLAND PRESERVATION

October 8, 2025

Denise Coleman
State Conservationist, USDA NRCS PA
Natural Resource Conservation Service
359 East Park Drive, Suite 2
Harrisburg, PA 17111
denise.coleman@usda.gov
717-237-2203

RE: Transource Pennsylvania, LLC (Transource) selected by PJM Interconnection, LLC to construct a new high voltage electric transmission substation in Peach Bottom Township, York County. This includes a short stretch of four overhead transmission lines (Transource POI Interconnection Lines) necessary to connect third-party (PECO) transmission lines into the Transource substation.

Dear Mrs. Coleman,

I have thoroughly reviewed the documents and facts submitted on behalf of Transource as they pertain to the proposed electric power line expansion project which is sited to include portions of the Grimmel Farm, LP property (hereinafter, "Grimmel Farm") located in Peach Bottom Township, York County. This letter sets forth my opinion based on the information Transource has provided to me as of September 22, 2025.

- The Grimmel Farm was preserved under the authority of the Commonwealth of Pennsylvania's Agricultural Area Security Law (AASL) (3 P.S. § 901 *et. seq.*) on June 25, 2014, and consisted of a preservation easement of 121.4 acres.

- The proposed project is for a utility right-of-way, specifically, for overhead electrical lines.

- The Grimmel Farm Agricultural Conservation Easement was conveyed to the Commonwealth of Pennsylvania in perpetuity and was partially funded with funds from the USDA, Farm and Ranch Lands Protection Program (FRPP).

- In accordance with the AASL, Section 14.1(c)(6)(ii), an agricultural conservation easement shall not prevent the granting of rights-of-ways by the owner of the subject land in and through the land for the installation of, transportation of or use of electric lines. (3 P.S. § 914.1(c)(6)(ii)(edited for clarity).)

Based on the law, the information provided by Transource, and my analysis, and after a review with PDA counsel, the Bureau of Farmland Preservation has no objection to the grant or expansion of a right-of-way for electrical lines across the Grimmel Farm.

Please note that this approval is limited to the matters expressly addressed herein and is based on the current state of the Agricultural Area Security Law and the facts as presented to me.

If you have any further questions or require additional information, please do not hesitate to contact me.

Sincerely,

Stephanie Zimmerman
Director
Bureau of Farmland Preservation
Pennsylvania Department of Agriculture

cc: Crystal Wood-Hython, Senior Staff Project Manager, Transource
Kent Keitch, Esq., Sr. Counsel, Transource
Maryanne Garber, Esq., Buchanan Ingersol & Rooney
Michael Albert, Soil Conservationist, USDA NRCS PA State Office
Eric Naylor, Director, York County Agricultural Land Preservation Board

Parcel - 43000BQ00410000000

Owner - GRIMMEL FARMS LP
Property Address - LAY RD
Tax Municipality - Peach Bottom Twp
School District - South Eastern School District
Class - Farm
Land Use - F - Vacant Agricultural
Acres - 131.49
Assessed Land Value - $ 75,460
Assessed Building Value - $ 0
Assessed Total Value - $ 75,460
Sale Date - Jul. 12, 2021
Sale Price - $ 1
Deed Book - 2664, Page 7621

Layers should not be used at scales larger than 1:2400 (Note: Pixilation will occur at scales 1" = below 200 Ft.)

Mapping Provided by
YORK COUNTY YCPC PLANNING COMMISSION

0 750
Feet

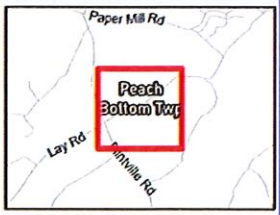
1 inch = 500 ft 1:6,000

Legend
- Land Joins
- Selected Parcel
- Parcels
- Municipal Boundary

Aerial Photography - 2021

Last Updated: 12/21/2022

Inset Map



SAM

525 Eastwind Drive, Suite 201
Westerville, Ohio 43081
Ofc: 614.818.0079
email: info@sam.biz

PROJECT: TRANSOURCE BRAHAN STATION
JOB NUMBER: 1024087782
DATE: 09/09/2025
SCALE: 1"=200'
SURVEYOR: R.SLOAN
TECHNICIAN: N. NEWCOMB
DRAWING: 87782-TRANSOURCE EASEMENT ACREAGE
TRACT ID: 43-000-RQ-0018-00-00000
PARTYCHIEF: VARIES
FIELDBOOKS: BOOK 43334, PAGE 58

TRANSOURCE P.O.I. INTERCONNECTION LINES
AND ASSOCIATED EASEMENTS
ON GRIMMEL PARCEL
SITUATED IN THE COMMONWEALTH OF PENNSYLVANIA
YORK COUNTY, PEACH BOTTOM TOWNSHIP.

BOUNDARY/EASEMENTS
SHEET 1
OF 1

VERIFICATION

I, Crystal L. Wood-Hython, Project Manager Staff Sr, American Electric Power, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Date: January 23, 2026

By: Crystal L Wood-Hython

Crystal L. Wood-Hython
Project Manager Staff Sr
American Electric Power

Signature: Crystal L Wood-Hython
Crystal L Wood-Hython (Jan 23, 2026 10:47:43 CST)

Email: tholmes@aep.com

Verification - Crystal L Wood-Hython, AEP (4921-2649-9722 v1)_1

Final Audit Report 2026-01-23

Created:	2026-01-23
By:	Crystal L Wood-Hython (tholmes@aep.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAATDmfJu6uKUGOEnifV2p_CkpfbMasoV1z

"Verification - Crystal L Wood-Hython, AEP (4921-2649-9722 v1)_1" History

Document created by Crystal L Wood-Hython (tholmes@aep.com)
2026-01-23 - 4:45:50 PM GMT

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2026-01-23 - 4:45:53 PM GMT

Email viewed by Crystal L Wood-Hython (tholmes@aep.com)
2026-01-23 - 4:46:42 PM GMT

Document e-signed by Crystal L Wood-Hython (tholmes@aep.com)
Signature Date: 2026-01-23 - 4:47:43 PM GMT - Time Source: server

Agreement completed.
2026-01-23 - 4:47:43 PM GMT

BEFORE THE
PENNSYLVANIA PUBLIC UTILTIY COMMISSION

Letter of Notification of Transource Pennsylvania, LLC,	**:**	
Filed Pursuant To 52 Pa. Code Chapter 57 Subchapter G,	**:**	
For Approval To Site Seven Substation Cut-In Lines	**:**	**Docket No. A-2026-**
From the Bramah Substation to Points of Interconnection	**:**	
in Peach Bottom Township, York County, Pennsylvania	**:**	

CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day, via First Class Mail, served a copy of the Letter of Notification of Transource Pennsylvania, LLC, Filed Pursuant To 52 Pa. Code Chapter 57 Subchapter G, For Approval To Site Seven Substation Cut-In Lines From the Bramah Substation to Points of Interconnection in Peach Bottom Township, York County, Pennsylvania on the following persons in the manner specified in accordance with the requirements of 52 Pa. Code §1.54:

U.S. Army Corps of Engineers
Baltimore District
2 Hopkins Plaza
Baltimore, Maryland 21201
Attn: Public Affairs Office

U.S. Fish and Wildlife Service
Pennsylvania Field Office
110 Radnor Road, Suite 101
State College, Pennsylvania 16801
Attn: Lesa Lindsay

USDA/NRCS
359 East Park Drive, Suite 2
Harrisburg, PA 17111
Attn: Denise Coleman, State Conservationist

Pennsylvania Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building 400 North Street
2nd Floor, Room-N201 Harrisburg, Pennsylvania 17120
Attn: Allison Kaster

Pennsylvania Department of Environmental Protection
400 Market Street
10th Floor Rachel Carson State Office Bldg.
Harrisburg, Pennsylvania 17101
Attn: Regional Permit Coordination Office

Pennsylvania Department of Transportation
Keystone Building
400 North Street, Fifth Floor
Harrisburg, Pennsylvania 17120
Attn: Jeffrey Spotts, Chief Counsel

Pennsylvania Historical and Museum Commission Bureau for Historic Preservation
Commonwealth Keystone Building
Second Floor
400 North Street
Harrisburg, Pennsylvania 17120-0093
Attn: Ms. Emma Diehl, Division Manager

Pennsylvania Department of Conservation and Natural Resources
Rachel Carson State Office Building
400 Market Street
Harrisburg, Pennsylvania 17105-8767

Attn: Rebecca Bowen, Ecological Services Section Chief
Pennsylvania Game Commission
2001 Elmerton Avenue
Harrisburg, Pennsylvania 17110-9797
Attn: David J. Gustafson, Director
Bureau of Wildlife Habitat Management

Pennsylvania Fish and Boat Commission
Centre Region Office
595 East Rolling Ridge Drive
Bellefonte, Pennsylvania 16823-9620
Attn: Christopher A. Urban, Chief
Natural Diversity Section

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555 Walnut Street 5th Floor Forum Place
Harrisburg, Pennsylvania 17101-1923
Attn: Darryl A. Lawrence, Interim Acting Consumer Advocate

Pennsylvania Office of Small Business Advocate
555 Walnut Street, 1st Floor Forum Place
Harrisburg, Pennsylvania 17101
Attn: Steven C. Gray, Senior Supervising Assistant Small Business Advocate

PA Department of Agriculture
Bureau of Farmland Preservation
2301 N. Cameron Street
Harrisburg, PA 17110-9408
Attn: Stephanie Zimmerman, Director

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Attn: Jeff Hill, District Manager

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28 E Market Street, 3rd Floor
York, PA 17401
Attn: Mike Pritchard, Director

York County Commissioners
28 E Market Street
York, PA 17401
Attn: Julie Wheeler, President

Peach Bottom Township Supervisors
6880 Delta Road, Suite 3
Delta, PA 17314
Attn: David Gemmill, Chair

Grimmel Farms, LP
3855 Federal Hill Rd
Jarrettsville, MD 21084-1527

Date: January 23, 2026

John F. Povilaitis
Buchanan Ingersoll & Rooney PC
400 North 2nd Street
Harrisburg, PA 17101
(717) 237-4825
John.povilaitis@bipc.com