

# Buchanan

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May 21, 2026

## **Via E-Filing**

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

**Re: Application of Transource Pennsylvania, LLC filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for Approval of the Siting and Construction of the 230 kV Transmission Line known as Project 9A West in a Portion of Franklin County, Pennsylvania  
Docket No. A-2026-**

Dear Secretary Homsher:

Enclosed for filing with the Pennsylvania Public Utility Commission (“PaPUC”) on behalf of Transource Pennsylvania, LLC (“Transource PA”), are the following documents:

1. Application for Approval of the Siting and Construction of the 230 kV Transmission Line known as Project 9A West (“Siting Application”);
2. Attachments 1 through 15 in support of the Siting Application, including a Notice of Filing, which are being uploaded in the PUC’s Shared Folder; and
3. Direct Testimony in support of the Application, which is being uploaded in the PUC’s Shared Folder.

The filing fee of \$350.00 for this Application was paid at the time of filing.

The enclosed Siting Application, a separate Application for a Certificate of Public Convenience and a Petition for Exemption from Zoning (“Zoning Petition”) are being filed today with the PaPUC by Transource PA. These filings relate to the same electric transmission line project. Accordingly, Transource PA is also filing today a Motion for Consolidation and Timely Disposition of the enclosed Siting Application, the related Application for the Certificate of Public Convenience and the Zoning Petition.

May 21, 2026  
Page - 2 -

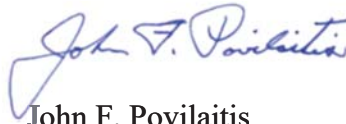
Copies of the Siting Application and accompanying Attachments and Direct Testimony are being served by certified mail, return receipt requested upon the persons indicated on the Certificate of Service.

Copies of the Notice of Filing are being served by certified mail, return receipt requested upon the persons indicated on the Certificate of Service.

Upon Commission approval, construction is scheduled to begin as soon as practicable to meet an in-service date for Project 9A West of January 19, 2029.

If there are any questions concerning this matter, please contact me at the address or telephone number provided.

Very truly yours,



**John F. Povilaitis**  
*Counsel for Transource Pennsylvania, LLC*

JFP/psm

Enclosures

cc: Darren Gill, Bureau of Technical Utility Services (via email)  
Deb Becker, Bureau of Technical Utility Services (via email)  
Jordan VanOrder, Bureau of Technical Utility Services (via email)  
Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania, LLC filed :  
Pursuant to 52 Pa. Code Chapter 57, Subchapter G, :  
for Approval of the Siting and Construction of the : Docket No. A-2026-\_\_\_\_\_  
230 kV Transmission Line known as Project 9A :  
West in a Portion of Franklin County, Pennsylvania :  
: :  
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**SITING APPLICATION OF TRANSOURCE PENNSYLVANIA, LLC**

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**TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:**

Transource Pennsylvania, LLC (“Transource PA” or the “Company”) hereby files,<sup>1</sup> pursuant to 52 Pa. Code § 57.72, this Siting Application requesting Pennsylvania Public Utility Commission (“Commission” or “PUC”) approval of the siting and construction of a proposed new electric substation and double-circuit Rice-Ringgold 230 kilovolt (“kV”) electric transmission line and related facilities in a portion of Franklin County, Pennsylvania (“9A West Project”). As explained below, the proposed Rice-Ringgold 230 kV Transmission Line and substation have been approved by PJM Interconnection, L.L.C.<sup>2</sup> (“PJM”) to alleviate transmission congestion constraints in Pennsylvania, Maryland, West Virginia, and Virginia.

**I. INTRODUCTION**

1. This Application is being filed with the Commission simultaneously with Transource PA’s Application for a Certificate of Public Convenience (“CPC”) under Chapter 11 of the Public Utility Code, 66 Pa. C.S. §101 *et seq.* (“Code”) to commence service as an electric transmission-only public utility in Franklin County, Pennsylvania Commonwealth (“CPC

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<sup>1</sup>See paragraphs 5-9 below regarding related PUC proceedings to this Siting Application.

<sup>2</sup>PJM Interconnection L.L.C. (“PJM”) is a regional transmission organization 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>

Application”) and a Petition for Confirmation of an Exemption from Local Zoning Regulation and for the Construction of Buildings in connection with the Construction of a Proposed Electric Substation in Franklin County, Pennsylvania (“Zoning Petition”). As explained below, as a result of PJM’s approval of the 9A West Project and the signing of a binding agreement, Transource PA is obligated to construct it timely. Through this Siting Application, Transource PA seeks Commission approval of the siting and construction of the 230 kV electric transmission line extending from the new Rice Substation to the Pennsylvania-Maryland border, in a portion of Franklin County, Pennsylvania. As explained below, Transource PA undertook a detailed analysis of feasible alternatives for the 9A West Project. The Proposed Route selected for the 9A West Project will be sited to extend approximately 24.4 miles between the Maryland border and the new Rice Substation to be located in Franklin County, Pennsylvania. Subject to the Commission’s approval, construction of the 9A West Project is scheduled to begin as soon as practicable following Commission approval to meet an in-service date of January 19, 2029. In support of this Siting Application, Transource PA states as follows:

**II. BACKGROUND AND OVERVIEW**

2. This Application is filed by Transource PA. Transource PA’s address is as follows:

Transource Pennsylvania, LLC  
1 Riverside Plaza  
Columbus, Ohio 43215-2372  
Attention: Crystal L. Wood-Hython Project MGR Staff Sr.

Transource PA's attorneys are:

John F. Povilaitis (PA ID No. 28944)  
Alan M. Seltzer (PA ID No. 27890)  
409 N. Second Street, Suite 500  
Harrisburg, PA 17101  
Phone: (717) 237-4800  
Fax: (717) 233-0852  
Email: john.povilaitis@bipc.com  
E-mail: alan.seltzer@bipc.com

Jessica A. Cano (FL ID. No. 37372)  
American Electric Power Service  
Corporation  
1 Riverside Plaza, 29<sup>th</sup> Floor  
Columbus, OH 43215  
Phone: 614-716-2921  
Fax: 614-716-1613  
E-mail: [jacano@aep.com](mailto:jacano@aep.com)

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

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

4. Transource PA was formed to construct, own, operate, and maintain electric transmission facilities and equipment within the Commonwealth of Pennsylvania.

5. Transource PA is an existing regulated transmission-only public utility in Pennsylvania having been issued a Certificate of Public Convenience ("CPC") by the PUC on December 19, 2024 in the matter *Authorizing approval to Transource Pennsylvania, LLC to begin to offer, render, furnish, or supply electric transmission service to the public in Peach Bottom Township, York County, Pennsylvania*, PUC Docket No. A-2024-3049272.

6. The PUC provisionally granted Transource PA a CPC in an order entered on January 23, 2018 at Commission Docket Nos. A-2017-2587821 and G-2017-2587822 in connection with the 9A West Project, together with the separately docketed 9A East Project, collectively called "Project 9A." Together, the Pennsylvania portions of Project 9A were known

as the Independence Energy Connection (“IEC”) Project. However, the CPC was rescinded when the PUC denied Transource PA’s separate applications for the siting of the proposed IEC Project in an order entered May 24, 2021, at PUC Docket Nos. A-2017-2640195 (the 9A East Project) and A-2017-2640200 (the 9A West Project) (collectively, the “IEC Proceeding”).

7. In an order dated December 6, 2023, at Docket No. 1:21-CV-01101 in *Transource Pennsylvania, LLC v. Steven M. DeFrank, et al.*, the United States Federal District Court for the Middle District of Pennsylvania overturned the Commission’s disapproval of the siting of the IEC Project transmission lines. That denial was subsequently appealed by the Commission to the U.S. Court of Appeals for the Third Circuit (“Third Circuit”) which, in a decision filed on September 5, 2025 at Docket No. 24-1045, reaffirmed the District Court order and held the PUC’s action disregarding the findings of PJM with respect to the need for the IEC Project violated the Supremacy Clause of the U.S. Constitution. *Transource Pa., LLC v. DeFrank*, 156 F.4th 351, 379 (3rd Cir. 2025), affirming *Transource Pa., LLC v. DeFrank*, 705 F. Supp. 3d 266 (M.D. Pa. 2023) (“*Transource*”). The PUC has determined not to further challenge the Third Circuit’s decision. Requests for intervention by the Pennsylvania Office of Consumer Advocate, the intervention and appearance as counsel by the Attorney General of the Commonwealth of Pennsylvania and a request for rehearing *en banc* were filed with the Third Circuit. By Order dated November 6, 2025, the Pennsylvania Attorney General’s Motion to withdraw as counsel and intervene in the appeal for purposes of reargument before the Third Circuit, *en banc*, was denied by a three-judge panel of the Third Circuit. The Attorney General is currently seeking a grant of *certiorari* on these issues before the U.S. Supreme Court.

8. After the Commission’s denial of the authorizations requested by Transource PA in the IEC Proceeding, transmission projects approved by PJM in 2022 utilizing existing rights of

way and the Chanceford 500 kV substation eliminated the need for the Transource PA Furnace Run 500 kV substation, rendering the 9A East Project no longer necessary.

9. After the Commission's rejection of the IEC Project in 2021, PJM placed the IEC Project into a suspended status. In 2025, PJM completed a restudy of the IEC Project, determined that the 9A West portion of the IEC Project was still needed, and that the cost/benefit ratio of the 9A West Project had increased.

10. Consistent with PJM removing the 9A West Project from suspension, and upon receipt of all necessary approvals requested in this Siting Application and the CPC Application, Transource PA will site, construct, own, operate and maintain the 9A West Project subject to this Commission's jurisdiction and lawful authority. Transource PA is not relying on the prior record created for the requested approval of Project 9A in the IEC Proceeding. Accordingly, in this Application, Transource PA is submitting all relevant, current information in support of Project 9A West, along with background information where helpful.

11. The 9A West Project involves the siting and construction of the new Rice-Ringgold 230 kV Transmission Line that will extend approximately 28.8 miles to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland and the new Rice Substation to be located in Franklin County, Pennsylvania. Approximately 24.4 miles of the 9A West Project will be located in Pennsylvania and approximately 4.4 miles will be located in Maryland. Transource PA herein seeks Commission approval of the siting and construction of the 9A West Project in Franklin County, Pennsylvania.<sup>3</sup>

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<sup>3</sup> As explained below, the Maryland portion of the 9A West Project will be constructed and owned by Transource PA's Maryland affiliate.

12. Accompanying this Siting Application are the following Attachments that provide additional detailed information regarding the proposed 9A West Project:

- Attachment 1 Commission Regulation Cross-Reference Matrix
- Attachment 2 Necessity Statement
- Attachment 2.1 Map and Electrical Schematic
- Attachment 2.2 Electrical Schematic
- Attachment 3 Designated Entity Agreement (“DEA”)
- Attachment 4 Siting Study
- Attachment 5 Engineering Description and Safety Practices
- Attachment 5.1 Structures
- Attachment 6 List of Owners of Property within the Right-of-Way
- Attachment 7 Agency Requirements
- Attachment 8 List of Governmental Agencies, Municipalities, and Other Public Entities Receiving the Application
- Attachment 9 List of Governmental Agencies, Municipalities, and Other Public Entities Contacted
- Attachment 10 List of Public Locations where the Siting Application can be Viewed by the Public
- Attachment 11 Electric and Magnetic Fields Policy and Practices of Transource Pennsylvania and Transource Maryland
- Attachment 12 Vegetation Management
- Attachment 13 Agency Coordination
- Attachment 14 Public Notice Requirements
- Attachment 15 Notice of Filing

13. Also accompanying this Siting Application are the following written direct testimonies further explaining and supporting this Application for approval to site and construct the 230 kV line associated with the 9A West Project and the contemporaneously filed CPC Application:

Transource PA St. No. 1: Evan K. Dean, Managing Director Joint Ventures Governance and Operations for AEPSC – Provides an overview of the 9A West Project; provides a description of Transource PA and other related entities; describes the process employed by Transource PA in developing, preparing and filing this Siting Application; explains the decision making process within Transource PA for selecting the transmission line route; explains how Transource PA will oversee the construction, operations and maintenance of the 9A West Project; provides a status on the right-of-way acquisitions and support for the granting of the CPC Application.

Transource PA St. No. 2: Eric S. Williams, Planning Engineer for AEP – Explains the need for the 9A West Project; describes the 9A West Project selected by PJM Interconnection, L.L.C. (“PJM”); and describes the obligation of Transource PA to complete the project timely, and the reliability benefits of the 9A West Project for Pennsylvania.

Transource PA St. No. 3: Timothy J. Horger, Senior Director, Forward Market Operations for PJM – Explains the PJM Process; explains the need for the 9A West Project; and describes how the 9A West Project was selected by PJM to be built.

Transource PA St. No. 4: Barry A. Baker, AECOM Corporation, Vice President – Environmental Planning & Permitting – Eastern U.S. – Explains the environmental assessment, siting analysis, public outreach, evaluation of the Alternative Routes, and selection of the Proposed Route for the new double-circuit 230 kV transmission line associated with the 9A West Project.

Transource PA St. No. 5: Jacob Clouse – Transmission Line Engineer for Burns & McDonnell – Explains the design features of the 9A West Project; and describes the design and safety features and Electric and Magnetic Fields and Practices of Transource PA for the 9A West Project, including the new 230 kV transmission line.

Transource PA St. No. 6: Michael Mechler – Director of Right-of-Way and Infrastructure, Western Land Services Inc. – Explains the process used by Transource PA to attempt to acquire the rights-of-way and easements necessary for the 9A West Project; and provides a summary of the status of negotiations with landowners.

14. This Siting Application, including the accompanying Attachments and Statements, which are incorporated herein by reference, contains the information required by 52 Pa. Code §§ 57.72(e), 69.1101, 69.3102 - 69.3107.

### **III. LEGAL STANDARDS APPLICABLE TO TRANSMISSION LINE SITING APPROVAL**

15. Under Code Section 1501, 66 Pa. C. S §1501, an electric utility has a statutory obligation to provide safe, adequate, and reliable service to its customers. The Commission’s regulations provide that a public utility may not construct high voltage (“HV”) transmission lines, i.e., electrical lines with an operating voltage of 100 kV or higher, without prior Commission approval. 52 Pa. Code § 57.71. As explained by the Commonwealth Court, the Commission’s transmission line siting regulations set forth the following:

(1) the procedures for applying for approval of an HV line - 52 Pa. Code § 57.72; (2) the procedures for hearings on HV line applications -- 52 Pa. Code § 57.75; and (3) what the [Commission] will consider when deciding whether to approve or deny an HV line application -- 52 Pa. Code § 57.76(a). These regulations, and 52 Pa. Code § 57.76 in particular, represent a codification of the review required by article I, section 27 of the Pennsylvania Constitution. Re Proposed Electric Regulation, 1976 Pa. PUC LEXIS 114, 49 Pa. P.U.C. 709, 712 (March 2, 1976) (stating that the “review required by article I, section 27 is being incorporated into our siting regulations”).

*Energy Conservation Council of Pennsylvania v. Pa. PUC*, 995 A.2d 465, 477-78 (Pa. Cmwlth. 2010) (“TrailCo”).

16. In order to grant an application for the construction and siting of an HV electric transmission line, the Commission must find and determine the following as to the proposed line:

- (1) That there is a need for it.
- (2) That it will not create an unreasonable risk of danger to the health and safety of the public.
- (3) That it is in compliance with applicable statutes and regulations, providing for the protection of the natural resources of this Commonwealth.
- (4) That it will have minimum adverse environmental impact, considering the electric power needs of the public, the state of the available technology and the available alternatives.

52 Pa. Code § 57.76(a).

17. The Code does not define need; however, Pennsylvania courts have recognized that there is a need for reliable regional electric service and transmission systems. *Stone v. Pa. PUC*, 162 A.2d 18, 19-221 (Pa. Super. 1960); *Dunk v. Pa. PUC*, 232 A.2d 231, 234-35 (Pa. Super. 1967).

18. In *Transource*, the Third Circuit held that, “when an RTO has selected [a multi-state transmission line project] for inclusion in a regional transmission plan as part of its federal mandate, a state regulator cannot, consistent with the Supremacy Clause, reject the project based on a lack of ‘need’.”<sup>4</sup> PJM has already determined that there is a need for the 9A West Project. Thus, the Commission is preempted from denying the siting of the 9A West Project based.<sup>5</sup>

19. With respect to natural resources and the environment under 52 Pa. Code § 57.76(a)(3), recent Pennsylvania Supreme Court case law has concluded that Article I, Section 27 of the Pennsylvania Constitution, i.e., the Environmental Rights Amendment,<sup>6</sup> placed Pennsylvania’s public natural resources in trust and named the Commonwealth as its trustee, to

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<sup>4</sup> *Transource* at 379.

<sup>5</sup> Pursuant to *England v. Louisiana State Board of Medical Examiners*, 375 U.S. 411 (1964), Transource PA reserves its right to seek adjudication of federal claims in federal court, should the Commission hold against Transource PA on questions of state law, including but not limited to (a) federal law preempting state regulators from finding there is not a need for a multi-state transmission line project that PJM has determined is needed and approved for inclusion in its regional transmission plan, (b) violation(s) of the Supremacy Clause of the United States Constitution, and/or (c) violation(s) of the Dormant Commerce Clause of the United States Constitution.

<sup>6</sup> PA. CONST. art. I, § 27.

conserve and maintain those resources for the benefit of all people, including future generations. In carrying out these obligations, the Commonwealth, and its agencies, may subject the individual rights of citizens to clean air, pure water, and to the preservation of natural, scenic, historic, and esthetic values to reasonable regulations.<sup>7</sup>

20. The Commission has determined that its existing rules and policy satisfy its obligations under the Environmental Rights Amendment.<sup>8</sup> The Commission further explained that:

The Commission’s regulatory scheme for high-voltage line transmission siting cases, therefore, provides for a robust, evidence based deliberative process that provides due process for all interested parties. The Commission, consistent with our role as a fiduciary responsible for the preservation of the Commonwealth’s natural resources, and consistent with PEDF, acts with prudence, loyalty and impartiality when adhering to these regulations. In this manner, we fulfill our responsibility to protect the public’s natural resources from depletion or degradation, while also allowing legitimate development that improves the lot of Pennsylvania’s citizenry, as the Pennsylvania Supreme Court recognized in *Robinson Township v. Com. of Pa.*, 623 Pa. 564, 658, 83 A.3d 901, 958 (2013).<sup>9</sup>

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<sup>7</sup> *Pa. Environmental Defense Foundation v. Com. Of Pa.*, 161 A.3d 911, 931 (Pa. 2017); *Application of Pennsylvania Electric Company Seeking Approval to Locate Construct, Operate and Maintain a High-Voltage Transmission Line Referred to as the Bedford North-Central City West 115 kV HV Transmission Line Project*, Docket Nos. A-2016-2565296 et al., at pp. 12-14 (Order entered March 8, 2018) (“*Penelec*”).

<sup>8</sup> *Penelec*, at pp. 13-14 (“Our siting Regulations are in accord with the Environmental Rights Amendment by requiring that the environmental impact of the proposed transmission siting route be minimized.”); see also 52 Pa. Code §§ 69.3105, 69.3106.

<sup>9</sup> *Penelec*, p. 14.

#### IV. NEED FOR THE PROJECT<sup>10</sup>

21. RTOs, or regional transmission organizations, supervise interstate transmission and planning of electricity. The Federal Energy Regulatory Commission (“FERC”) encouraged the formation of RTOs by requiring utilities to report their progress towards developing and participating in RTOs to FERC.<sup>11</sup> The purpose of such RTOs is for transmission facilities owned by utilities to be placed under the control of an appropriate RTO.<sup>12</sup>

22. FERC regulations require that each RTO have “operational authority for all transmission facilities under its control”<sup>13</sup> and “exclusive authority for maintaining the short-term reliability of the grid that it operates.”<sup>14</sup>

23. PJM is a FERC-approved RTO charged with ensuring the reliable and efficient operation of the electric transmission system under its functional control and coordinating the transmission of electricity in all or parts of thirteen states, including Pennsylvania, and the District of Columbia.

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<sup>10</sup>Notwithstanding the Third Circuit’s decision in *Transource* (See Paragraph 6 above) limiting the PUC’s role in assessing the need for interstate transmission line projects like Project 9A West, Transource PA is providing background on the “need” for Project 9A West in Attachment 2 and in the filed testimony from PJM without prejudice to, and with the full reservation of legal rights regarding, the PUC’s obligation to adjudicate these issues in connection with this Siting Application. In particular, Transource PA notes that the U.S. Third Circuit Court of Appeals recently held that, “when an RTO has selected [a multi-state transmission line project] for inclusion in a regional transmission plan as part of its federal mandate, a state regulator cannot, consistent with the Supremacy Clause, reject the project based on a lack of ‘need.’” *Transource Pa., LLC v. DeFrank*, 156 F.4th 351, 379 (3rd Cir. 2025), affirming *Transource Pa., LLC v. DeFrank*, 705 F. Supp. 3d 266 (M.D. Pa. 2023) (“*Transource*”). Thus, while the Commission holds authority over siting and construction of a project, it may not deny a project based on FERC’s determination of need. *Id.* at 378. Thus, and as noted above, Transource PA is submitting information regarding the benefits of and need for Project 9A West without prejudice to the decision in *Transource* and with a full reservation of rights both before the Commission and in the appellate courts.

<sup>11</sup>See Order No. 2000, Regional Transmission Organizations, 65 Fed. Reg. 810, 811 (Jan. 6, 2000) (codified at 18 C.F.R. pt. 35).

<sup>12</sup>*Id.* at 811.

<sup>13</sup>18 C.F.R. § 35.34(j)(3).

<sup>14</sup>*Id.* § 35.34(j)(4).

24. In order to ensure reliable transmission service, PJM prepares an annual Regional Transmission Expansion Plan (“RTEP”).<sup>15</sup> The RTEP is an annual planning process that encompasses a comprehensive series of detailed analyses to ensure electric power continues to flow reliably to customers under stringent reliability planning criteria.<sup>16</sup>

25. In addition to the reliability analysis, PJM’s RTEP includes a Market Efficiency Analysis to identify congestion on electric transmission facilities that have economic or wholesale market effects, as well as potential improvements to electric transmission economic efficiencies. The electric transmission needs identified in this analysis stem from the fact that the PJM transmission grid provides the means for generators to participate in a competitive wholesale market to supply electricity, both capacity and energy, to customers in PJM’s geographic footprint no matter where in this area the electrical load is located.

26. The electric transmission infrastructure needs identified by the PJM Market Efficiency Analysis are addressed by market efficiency transmission projects, which are aimed specifically at improving electric transmission economic efficiencies and alleviating electric transmission constraints that have an economic impact on PJM’s wholesale energy or capacity markets.

27. When PJM’s Market Efficiency Analysis identifies a need to relieve congestion on electric transmission facilities, PJM opens a Long-Term Proposal Window to solicit the submittal of potential solutions (*i.e.*, market efficiency projects) to address those needs. PJM’s solicitation

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<sup>15</sup> PJM’s RTEP process is currently set forth in Schedule 6 of PJM’s Amended and Restated Operating Agreement (“Schedule 6”). Schedule 6 governs the process by which PJM’s members rely on PJM to prepare an annual regional plan for the enhancement and expansion of the transmission facilities to ensure long-term, reliable electric service consistent with established reliability criteria. In addition, Schedule 6 addresses the procedures used to develop the RTEP, the review and approval process for the RTEP, the obligation of transmission owners to build transmission upgrades included in the RTEP, and the process by which interregional transmission upgrades will be developed.

<sup>16</sup> PJM Manual 14B outlines the RTEP process and reliability criteria used for this process. PJM Manual 14B is available at: <http://www.pjm.com/~media/docuiments/manuals/ml14b.ashx>,

of market efficiency project submittals through its Long-Term Proposal Window is a competitive process consistent with FERC Order No. 1000.<sup>17</sup> Potential solutions are evaluated using two criteria: first, the project must address the congestion identified in the Market Efficiency Analysis; and, second, the project benefits must exceed the costs by at least 25 percent.<sup>18</sup> In addition, the project must meet PJM's congestion criteria and not create additional unacceptable congestion elsewhere on the system.

28. Market efficiency projects that are selected through PJM's Long Term Proposal Window are presented to stakeholders and recommended to the PJM Board of Managers ("PJM Board") for approval. If approved, such market efficiency projects are included in the RTEP as Baseline Projects.

29. Pursuant to Schedule 6 of PJM's Amended and Restated Operating Agreement, after the PJM Board approves a proposed market efficiency project, the successful project proponent is obligated to complete the project once PJM and the successful entity execute a Designated Entity Agreement, which specifically designates the entity or entities having construction responsibility for the project.

30. After extensive evaluation and review with stakeholders, PJM selected Project 9A to address the needs identified in PJM's 2014/2015 RTEP Long Term Proposal Window because it provided the highest benefit-to-cost ratio, the most total congestion savings, and the most production cost savings.<sup>19</sup> As part of the 2014/2015 RTEP, PJM estimated that Project 9A

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<sup>17</sup> A summary of FERC Order No. 1000 is available at: <http://www.ferc.gov/industries/electric/indus-act/trans-plan.asp>.

<sup>18</sup> Project benefits are measured by comparing the benefits in the form of net load payments and/or production costs with and without the proposed project for a 15-year study period. The economic benefit/cost ratio threshold test is set forth in PJM Manual 14B, Attachment E, available at: <http://www.pjm.com/~media/documents/manuals/ml4b.ashx>.

<sup>19</sup>The recommendation of PJM staff to approve Project 9A is available at: <http://www.pjm.com/~media/committees-groups/committees/teac/20160811/20160811-boardwhitepaper-august-2016.ashx>.

(of which the 9A West Project is a part) could lower wholesale electricity costs in congested-constrained regions.

31. On August 2, 2016, the PJM Board approved Project 9A as Baseline Upgrade Numbers b2743 and b2752, which included the 9A West Project.

32. PJM has conducted periodic annual re-evaluations of Project 9A West since the project was placed in suspension status in 2021. PJM's 2025 annual re-evaluation showed a 3.74 B/C ratio for the original configuration of Project 9A and a 3.85 B/C ratio for the western portion of the project only, i.e., the 9A West Project.

33. While other RTEP projects have been constructed since 2021 and therefore have obviated the need for what had been the eastern portion of the original Project 9A, PJM's staff recommended to PJM's Board of Managers in May 2025 that the 9A West Project be continued given its positive benefits and favorable B/C ratio.

34. On July 30, 2025, the PJM Board of Managers approved the recommended modification of Project 9A's scope, finding that the 9A West Project is needed and supports the prompt construction of needed infrastructure in the region.

35. Although the primary benefits from the 9A West Project relate to market efficiency and the reduction of congestion costs, the new transmission facilities associated with the 9A West Project will also enhance the electrical strength and reliability of the transmission system by virtue of the new transmission facilities in the area that will be part of the interconnected transmission grid. The 9A West will provide additional and alternative paths for electricity in the event of outages on other transmission facilities. The 9A West Project will also allow the interconnection of potential future reliability and generation projects in the area.

36. Pertinent to this Application, the 9A West Project as approved by PJM involves: (i) construction of the Rice Substation and (ii) construction of the Rice-Ringgold 230 kV

Transmission Line, and associated structures, equipment, and other facilities necessary to operate the transmission lines.

37. Accordingly, in accordance with Schedule 6 of PJM's Amended and Restated Operating Agreement and as stated in the DEA between and among PJM, Transource PA, Transource Energy, LLC and Transource Maryland, LLC dated April 2, 2026, Transource PA is required to complete the 9A West Project and have it ready for service by January 19, 2029.

38. Detailed descriptions of the process used by PJM to select and approve market efficiency projects, the need for the proposed 9A West Project as identified by PJM, and the obligation of Transource PA to complete the 9A West Project are provided in Attachment 2 to the this Siting Application and in the direct testimonies of Eric S. Williams and Timothy J. Horger, Transource PA Statement Nos. 2 and 3, respectively.

## **V. DESCRIPTION OF THE PROPOSED PROJECT**

39. The 9A West Project as approved by PJM involves: (i) construction of the Rice Substation and, and (ii) construction of the Rice-Ringgold 230 kV Transmission Line, and associated structures, equipment, and other facilities necessary to operate the transmission lines.

40. Upon receipt of all necessary approvals, the new Rice-Ringgold 230 kV Transmission Line will be sited to extend approximately 28.8 miles, connecting the existing Ringgold Substation located near Smithsburg, Washington County, Maryland, and the new Rice Substation to be located in Franklin County, Pennsylvania. This transmission line project is referred to as the 9A West Project and is the subject of this Siting Application.

41. The Pennsylvania portion of the 9A West Project will extend approximately 24.4 miles from the new Rice Substation to the Pennsylvania-Maryland border, and the Maryland portion of the 9A West Project will extend approximately 4.4 miles from the Pennsylvania-Maryland border to the existing Ringgold Substation. Transource PA will construct, own, operate,

and maintain the Pennsylvania portion of the Rice-Ringgold 230 kV Transmission Line, and Transource MD will construct, own, operate, and maintain the Maryland portion of the line.

42. Maps of the proposed 9A West Project are provided in Attachment 2, as well as Attachment 4 to this Siting Application.

43. As described in Statement No. 5 the testimony of Jacob Clouse and Associated Attachment 5, the Pennsylvania portion of the 9A West Project will require the installation of approximately 155 structures with an average height of 130 feet. The spans between the structures will be approximately 800 feet.

44. The Pennsylvania portion of the 9A West Project will largely consist of tubular steel monopole and multi-pole structures. In certain areas, steel lattice structure may be used to better accommodate topographical, construction, or land use constraints. Depictions of typical structures to be used for the 9A West Project are provided in Attachment 4 to this Siting Application.

45. The Rice-Ringgold 230 kV Transmission Line associated with the 9A West Project will be a 230 kV double-circuit transmission line. The 230 kV double-circuit design will utilize twelve power conductors, with two conductors used for each of the six phase positions, and two overhead ground wires.

## **VI. SITING ANALYSIS**

### **A. SUMMARY OF THE SITING ANALYSIS**

46. In accordance with the Commission's regulations at 52 Pa. Code § 57.72(c), Transource PA conducted an extensive, multi-faceted Siting Study to determine the overall best and most suitable route for a new 230 kV transmission line to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland to the new Rice Substation to

be located in Franklin County, Pennsylvania. The Siting Study for the 9A West Project is provided in Attachment 4 to this Siting Application.

47. The Siting Study was used to develop feasible Alternative Routes, evaluate potential impacts associated with the Alternative Routes, and identify a Proposed Route to be constructed to meet the need for the 9A West Project. The Siting Study provided Transource PA with a means to assess the human/built, environmental, engineering, and constructability variables associated with the different Alternative Routes so that a Proposed Route could be determined for the IEC-West Project. The Siting Study was initially performed in 2017. In preparation for this Application, Transource PA reviewed the original Siting Study for accuracy and has updated it to reflect current conditions along the Proposed Route and Alternative Routes.

48. Many sources of information were used to develop data for the Siting Study. These sources of information are summarized in Attachment 4 to this Siting Application.

49. The Siting Team also used a series of general siting guidelines and factors to direct the development, evaluation, and ultimate selection of routes. Using these routing guidelines and factors, the Siting Team identified opportunity and constraint features within the Study Area that would minimize potential impacts to the natural and human/built environments. Details of the opportunity and constraints used to develop the Alternative Routes are included in Attachment 4 to the Siting Application.

50. The route development process is inherently iterative with modifications made throughout the siting analysis as a result of the identification of new constraints, input from agencies, landowners, and other stakeholders, periodic re-assessment of routes with respect to the siting guidelines and factors, and adjustments to the overall route network to develop feasible Alternative Routes.

51. The Alternative Routes identified in the original Siting Study were re-examined, and re-evaluated as part of Transource PA's overall updating of 9A West's supporting information. The Siting Team undertook a quantitative and qualitative analysis of potential impacts of each Alternative Route to the human/build environment, the natural environment, and engineering considerations. The Alternative Routes were reviewed in detail and compared using a combination of information collected in the field, Geographic Information System ("GIS") data sources, public and agency input, engineering and constructability considerations, and the collective knowledge and experience of the Siting Team.

52. Using the quantitative and qualitative analysis described above, the Siting Team selected a Proposed Route that, on balance, best minimized the overall impacts of the project. The rationale for selecting the Proposed Route was derived from the accumulation of the siting decisions made throughout the process, the knowledge and experience of the Siting Team, comments from the public and regulatory agencies, and the comparative analysis of potential impacts of each Alternative Route.

53. A detailed description of the process used to select the Proposed Route for the 9A West Project, and the confirmation process used to verify the continuing appropriateness of the Proposed Route is provided in Attachment 4 to the Siting Application.

## **B. SELECTION OF THE PROPOSED ROUTE**

54. Using the siting process described above, the Siting Team re-examined the three (3) Alternative Routes selected for the 9A West Project: Alternative Route A, Alternative Route B, and Alternative Route C.

55. These three Alternative Routes are illustrated in Figure 7 of Attachment 4. Attachment 4 Siting Study (Section 3.5.5) details those changes that have occurred to the respective Alternative Routes from the 2018 Siting Study to the 2026 Siting Study. Adjustments

were developed to account for residential or commercial developments that have taken place during this time frame; or to address specific planned development relayed to Siting team during stakeholder engagement.

56. The Siting Team undertook a qualitative and quantitative review and comparison of each Alternative Route. A detailed explanation of the qualitative and quantitative analysis and comparison of the Alternative Routes is provided in Attachment 4 to this Application.

57. As part of the original review and comparison of the Alternative Routes, Transource PA conducted a public outreach program, which included two rounds of public open houses and a project website to inform the public about the IEC-West Project and obtain information from landowners about their properties. As part of the preparation of this Application, additional public outreach was performed as described in Statement No. 4 and related Attachment 4. Feedback provided by the public was taken into consideration as the Siting Team analyzed the Alternative Routes. A summary of Transource PA's original and updated public outreach efforts is provided in Attachment 4 to this Siting Application.

58. The Alternative Routes were compared and a Proposed Route was selected based upon a detailed analysis and balance of impacts on the human/built environment, environmental impacts, and engineering and constructability considerations. Based on these evaluation processes, the Siting Team selected Alternative Route C as the Proposed Route for the proposed 9A West Project.

59. The Proposed Route extends approximately 27.9 miles (approximately 23.5 miles in Pennsylvania and approximately 4.4 miles in Maryland). A general description of the Proposed Route is provided below:

- Alternative Route C exits the Rice Substation from the southeast corner and spans 0.2 miles east over the active Norfolk Southern railroad and to the east side of I-81, where it turns to the south to parallel I-81 for 1.1 miles to SR 696. Along this stretch

the route crosses Pine Stump Road, Mountain Run (CWF), and is within 0.5 miles of the Rocktop Airport that is located to the east past SR 696.

- Alternative Route C turns sharply east to cross SR 696 perpendicularly and travels approximately 0.6 mile to the east-southeast through an agricultural field before turning sharply to the southwest.
- Travelling southwest for 0.7 mile, Alternative Route C crosses Phillaman Run (CWF) and then crosses Black Gap Road (SR 997) in a perpendicular fashion. Alternative Route C traverses for 0.6 mile around the perimeter of the Chambersburg Mall, generally following the outer edge of the parking lot on the northern and eastern sides of the mall, and then heading west to parallel with I-81 again.
- After reaching the eastern side of I-81, Alternative Route C turns sharply south and parallels the interstate for approximately 1.4 miles and at this location I-81 and the route generally travel in a western direction. Along this section, Alternative Route C traverses the edge of agricultural fields and crosses an unnamed stream (CWF) and the Conococheague Creek (CWF).
- Alternative Route C turns sharply to the southwest and travels 0.4 miles until it reaches the existing FE Letterkenny-Grand Point 138 kV transmission line. The route stays to the east of this system and parallels it south for approximately 1.6 miles toward U.S. Route 30, spanning along agricultural fields, around the Grand Point Substation, and over Walker Road. The Lost Acres Airport is located approximately 0.6 miles west of the route.
- Prior to crossing commercial building-lined U.S. Route 30, Alternative Route C first crosses over to the west side of the transmission line, which is now the FE Grand Point-Allegheny Energy 138 kV line and then spans the highway. The route turns sharply west and then south for 0.5 miles spanning across a parking lot and bypassing around a commercial building. After going around the building, the route again parallels the FE Grand Point-Allegheny Energy 138 kV line for 0.5 mile.
- Alternative Route C deviates from the transmission line corridor for 1.1 mile to bypass around homes along the line. Along this section, the route extends to the southwest and spans Falling Spring Branch (HQ-CWF) stream, crosses Falling Spring Road, and traverses through a forested area where homes are present to the east. Within the forest, the route turns south, travels across an agricultural field and spans the FE Grand Point-Allegheny Energy 138 kV line near Henry Lane.
- After crossing this road, Alternative Route C extends to the southeast for approximately 4.6 miles over agricultural fields to Yohe Road, where it intersects with the FE Fayetteville-West Waynesboro 138 kV transmission line. This section involves crossing two unnamed WWF streams, one CWF stream, several local roadways, and the FE Fayetteville-Allegheny 69 kV line.

- As Alternative Route C crosses Yohe Road, it also spans to the east side of the FE Fayetteville-West Waynesboro 138 kV transmission line and then turns sharply to the south to parallel this existing line for approximately 1.7 miles; an unnamed CWF stream is crossed in this section, as is Stamey Hill Road.
- A 0.6 mile deviation from the colocation is required in the vicinity of the Manheim Road crossing due residential development that has built up adjacent to the transmission line, and the route then parallels the existing line for 0.5 miles on the eastern side.
- At Hess Benedict Road, Alternative Route C crosses over to the west side of the FE Fayetteville-West Waynesboro 138 kV transmission line to avoid agricultural and residential structures. The route parallels the line for another 3.7 miles, traversing agricultural fields, crossing Orphanage Road, Wayne Highway (SR 316), and Buchanan Trail East (SR 16), as well as an unnamed CWF stream.
- After crossing SR 16 and spanning the FE Antrim-West Waynesboro 69 kV lines, Alternative Route C turns sharply to the west and parallels this line for approximately 0.4 miles. This stretch includes a crossing of Cold Springs Road and an unnamed CWF stream.
- Turning to the south and then east, Alternative Route C extends for 1.2 miles to Marsh Road. The route traverses an agricultural field to avoid agricultural and residential structures, and crosses an unnamed CWF stream, the FE Reid-West Waynesboro 69 kV line, and the FE Ringgold-West Waynesboro 138 kV line.
- After crossing Marsh Road and an unnamed CWF stream, Alternative Route C turns sharply south to parallel the east side of the FE Ringgold-West Waynesboro 138 kV line for 2.1 miles. Alternative Route C crosses agricultural fields, Hagerstown Road (SR 316), the FE West Waynesboro-East Waynesboro 138 kV line, and the West Branch Antietam Creek (CWF) along this stretch. The route extends away from the transmission line corridor to avoid residential structures near the southern end of this section prior to crossing Lyons Road.
- Spanning to the west side of the FE Ringgold-West Waynesboro 138 kV line, Alternative Route C turns south and crosses the Pennsylvania/Maryland state line. The route generally parallels the transmission line for approximately 2.6 miles until it intersects with Gardenhour Road. Some deviations are required along this stretch to avoid agricultural operations and structures. The route in this section crosses Rocky Forge Road, Ringgold Pike (SR 418), Poplar Grove Road, and Newcomer Road, as well as numerous crossings of various tributaries to Little Antietam Creek.
- Alternative Route C crosses Gardenhour Road paralleling the existing transmission line for 0.4 miles and traverses through an orchard.
- Alternative Route C extends out for 0.6 miles to the southwest from the transmission line to bypasses around residential structures along Rowe Road and

traverses agricultural lands before spanning over to the south side of the FE Reid-Ringgold 138 kV transmission line.

- Alternative Route C turns east for 0.7 miles and extends into the southeastern corner of the Ringgold Substation, spanning the FE Ringgold-East Hagerstown 138 kV transmission line and Smithsburg Pike (MD 64) along the alignment.

60. The Siting Team determined that the cumulative environmental, human/built, engineering, and constructability impacts associated with the Proposed Route, Alternative Route C, will be significantly less impactful than the other Alternative Routes. A detailed explanation of the selection of the Proposed Route is provided in Attachment 4 to this Application.

## **VII. RIGHTS-OF-WAY**

61. Transource PA's standard right-of-way width for a double circuit 230 kV transmission line is 130 feet, 65 feet either side of the proposed centerline of the transmission line. The right-of-way is determined by the structure type, design tensions, span length, and conductor "blowout" (the distance the wires are moved by a crosswind).

62. The right-of-way for the 9A West Project will be approximately 130 feet but may vary in certain areas to accommodate environmental, engineering, and constructability issues, as well as ensure compliance with the National Electrical Safety Code ("NESC") clearances.

63. There are a total of 102 landowners (85 in Pennsylvania) and 129 parcels (108 in Pennsylvania) along the route selected for the proposed 9A West Project. Detailed maps showing the properties traversed by the right-of-way for the proposed 9A West Project are provided at the end of Attachment 4 to this Siting Application.

64. Landowners who previously provided Transource PA rights-of-way ("ROW") have been advised of the 9A West Project, principally via Transource PA's exercise of rights under previously negotiated options. The landowners from whom Transource PA plans to negotiate to

acquire additional ROW and easements have been provided the notices and information required by the Commission's regulations at 52 Pa. Code § 57.91 and 69.3102.

65. A description of the process Transource PA will utilize to attempt to acquire the few remaining rights-of-way and easements for the 9A West Project is provided in Transource PA Statement No. 6.

66. Given the construction schedule and in-service date for the 9A West Project, it is necessary for Transource PA to file this Siting Application as it continues right-of-way negotiations with landowners.

67. Transource PA will continue to negotiate with all affected landowners in an effort to reach a reasonable and mutually acceptable right-of-way agreement and, thereby, avoid the need to condemn rights-of-way across the properties traversed by the 9A West Project.

#### **VIII. HEALTH AND SAFETY**

68. The proposed 9A West Project will not create any unreasonable risk of danger to the public health or safety.

69. The new 230 kV transmission line associated with the 9A West Project will be designed, constructed, operated, and maintained in a manner that meets or surpasses all applicable NESC minimum standards and all applicable legal requirements.

70. In addition to meeting the NESC standards, the 9A West Project will also be designed to meet the recommendations outlined in the American Society of Civil Engineers ("ASCE") Manual 74 ("Guidelines for Electrical Transmission Line Structural Loading").

71. A description of Transource PA's safety and design practices that will be incorporated into the 9A West Project is provided in Attachment 5 to this Siting Application.

72. Attachment 11 accompanying this Application explains Transource PA's standards for Electric and Magnetic Fields Policy and Practices, which will be applied to the 9A West Project.

73. Transource PA is responsible for the safe operation and maintenance of its facilities and, therefore, is directly responsible for the management and maintenance of tall growing vegetation that could potentially affect the safe and reliable operation of its transmission lines. Attachment 12 accompanying this Siting Application explains Transource PA's vegetation management practices that will be applied to the 9A West Project.

74. Although the Proposed Route will traverse certain facilities, the 9A West Project will not interfere with the operation of any communication towers, pipelines, or other utilities. Transource PA will work with the incumbent utilities to ensure proper clearances in order to safely operate and maintain the facilities.

75. Several major roadways will be spanned by the proposed 9A West Project. If necessary, Pennsylvania Department of Transportation ("PennDOT") Highway Occupancy Permits or equivalent type permits will be acquired by Transource PA for these major highways and all other state roads prior to construction.

76. The Lost Acres Airport is located approximately 0.6 miles west of the Proposed Route for the 9A West Project. Transource PA does not anticipate any interference with airport operations. However, if necessary, Transource PA will file all required documentation with the Federal Aviation Administration and the Pennsylvania Department of Transportation, Bureau of Aviation.

## IX. ENVIRONMENTAL CONSIDERATIONS

77. As noted in the Legal Standards section of this Siting Application, *supra*, Section 27, Article I of the Pennsylvania Constitution, known as the Environmental Rights Amendment (“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.

78. 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).

79. 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).

80. 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 unopposed, 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.<sup>20</sup>

81. Based on the representations contained in this Application and the detailed environmental studies and analyses conducted by Transource PA and its consultants attached hereto, the 9A West 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.

**X. COST AND IN-SERVICE DATE**

82. The current estimated cost for the total 9A West Project is approximately \$231.3 million, which includes approximately \$108.7 million for substation work and approximately \$122.6 million for the new Rice-Ringgold 230 kV Transmission Line. This cost estimate includes siting, engineering, procurement, construction, financing, administrative, development, and legal costs.<sup>21</sup>

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<sup>20</sup> *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.

<sup>21</sup> All estimates are subject to change as the constructability of the 9A West Project, sequences of construction and other factors may affect cost are identified and analyzed as the project progresses.

83. Subject to the Commission's approval, construction of the 9A West Project is scheduled to begin as soon as practicable following Commission approval to meet an in-service date of January 19, 2029.

#### **XI. NOTICE AND SERVICE**

84. As part of the review and comparison of the Alternative Routes, Transource PA supplemented its prior public outreach program. Feedback provided through these outreach efforts was taken into consideration as the Siting Team re-analyzed the Alternative Routes and selected the Proposed Route for the 9A West Project.

85. Transource PA has received and responded to comments from residents and other interested parties. Transource PA will continue responding to comments and inquiries and provide periodic updates to residents and other interested parties. Transource PA will continue its commitment to open communications and, where practical, will be responsive to input regarding the 9A West Project from local residents and other interested parties.

86. A detailed explanation of Transource PA's public outreach efforts is provided in Attachment 4 to this Siting Application.

87. Transource PA has provided public notices in accordance with Sections 57.91 and 69.3102 of the Commission's regulations, 52 Pa. Code §§ 57.91, 69.3102. The public notices for this project are provided in Attachment 14 to this Application.

88. Copies of this Siting Application and Notices of Filing are being served in accordance with the provisions of Section 57.74 of the Commission's regulations, 52 Pa. Code § 57.74.

89. As soon as practicable after the filing of this Application, Transource PA will publish notice of the filing in newspapers of general circulation in the area of the proposed 9A West Project. This notice will: (a) note the filing with the Commission; (b) provide a brief

description of the 9A West Project and its location; (c) provide area locations where the completed Siting Application may be reviewed by the public; and (d) provide any additional information as directed by the Commission.

90. Transource PA also requests that the Commission publish notice of this Siting Application in the Pennsylvania Bulletin.

## **XII. RELATED PROCEEDINGS**

91. As noted above, this Siting Application, the CPC Application and the Zoning Petition are being filed simultaneously with the Commission.

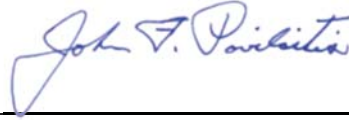
92. This Siting Application, the CPC Application and the Zoning Petition share common and interrelated issues. Pursuant to 52 Pa. Code § 57.75(i)(1), Transource PA requests that all of these related proceedings and filings be consolidated for purposes of hearings, if necessary, and decision.

## **XIII. CONCLUSION**

WHEREFORE, Transource Pennsylvania, LLC respectfully requests that the Pennsylvania Public Utility Commission: (1) consolidate this Siting Application with Transource PA's CPC Application and the Zoning Petition, all of which are being filed concurrently with the PUC; (2) approve the siting and constructing of the Rice-Ringgold 230 kV Transmission Line associated with the 9A West Project in a portions of Franklin County, Pennsylvania as explained above and in the Attachments and Testimony submitted in support of this Siting Application; (3) find that Transource PA has fully evaluated the proposed environmental impacts of the 9A West Project consistent with applicable Pennsylvania law and (4) grant to Transource PA such other

relief as may be just and reasonable, including all other waivers and/or approvals necessary to site the 9A West Project.

Respectfully submitted,



Dated: May 21, 2026

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E-mail: [jacano@aep.com](mailto:jacano@aep.com)

Attorneys for Transource Pennsylvania, LLC

# **ATTACHMENT 1**

# **ATTACHMENT 2**

# **ATTACHMENT 2.1**

## **ATTACHMENT 2.2**

# **ATTACHMENT 3**

# **ATTACHMENT 4**

# **ATTACHMENT 5**

# **ATTACHMENT 5.1**

# **ATTACHMENT 6**

# **ATTACHMENT 7**

# **ATTACHMENT 8**

# **ATTACHMENT 9**

# **ATTACHMENT 10**

# **ATTACHMENT 11**

# **ATTACHMENT 12**

# **ATTACHMENT 13**

# **ATTACHMENT 14**

# **ATTACHMENT 15**

# **STATEMENT 1**

## **STATEMENT 2**

## **STATEMENT 3**

## **STATEMENT 4**


## **STATEMENT 5**

## **STATEMENT 6**

## VERIFICATION

I, Evan K. Dean, Managing Director, Transmission Joint Ventures Governance and Operations, hereby state that the facts set forth above 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: May 21, 2026

By:   
Evan K. Dean, Managing Director  
Transmission Joint Ventures Governance  
and Operations

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania, LLC filed :  
Pursuant to 52 Pa. Code Chapter 57, Subchapter G, :  
for Approval of the Siting and Construction of the : Docket No. P-2026-\_\_\_\_\_  
230 kV Transmission Line known as Project 9A :  
West in a Portion of Franklin County, Pennsylvania :  
: :  
: :  
: :

**CERTIFICATE OF SERVICE**

I hereby certify and affirm that I have this day served a copy of the Application of Transource Pennsylvania, LLC filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for Approval of the Siting and Construction of the 230 kV Transmission Line known as Project 9A West in a Portion of Franklin County, Pennsylvania on the following persons in the manner specified in accordance with the requirements of 52 Pa. Code §1.54:

**Via Certified Mail, Return Receipt Requested**

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 Office of Small  
Business Advocate  
555 Walnut Street, 1st Floor Forum Place  
Harrisburg, Pennsylvania 17101  
Attn: NazArah Sabree

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

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

Pennsylvania Department of  
Transportation Secretary  
Room 1200  
Transportation and Safety Building  
Harrisburg, Pennsylvania 17120

Pennsylvania Historical & Museum  
Commission  
Chairman  
300 North Street  
Harrisburg, PA 17120

Franklin County Planning Department  
272 North Second Street  
Chambersburg, PA 17201  
Contact: Quentin Clapper, Planning Director

Greene Township Supervisors  
Attn: Todd E. Burns, Chairman  
1145 Garver Lane  
Chambersburg, PA 17202

Guildford Township Supervisors  
Attn: Don Clapper, Chairman  
115 Spring Valley Road  
Chambersburg, PA 17202

Quincy Township Supervisors  
Attn: Alan Peck, Chairman  
7575 Mentzer Gap Road  
Waynesboro, PA 17268

Borough of Waynesboro  
Attn: Jason Stains, Borough Manager  
55 East Main Street  
Waynesboro, PA 17268

Washington Township Supervisors  
Attn: Scott Stine, Chairman  
11798 Buchanan Trail East  
Waynesboro, PA 17268

West Penn Power Company  
341 White Pond Drive  
Akron, OH 44320

Potomac Edison Co.  
341 White Pond Drive  
Akron, OH 44320

Pennsylvania Electric Company (PENELC)  
341 White Pond Drive  
Akron, OH 44320

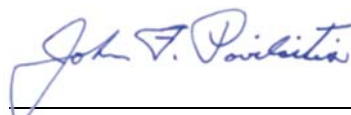
Rockies Express Pipeline, LLC  
4200 West 115th Street  
Suite 350  
Leawood, KS 66211

Texas Eastern Transmission, L.P.  
5400 Westheimer Court  
Houston, TX 77056

Columbia Gas Transmission Corp.  
700 Louisiana Street  
Houston, TX 77002

Dominion Energy  
5000 Dominion Boulevard  
Glen Allen, VA 23060

Date: May 21, 2026



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