

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania, LLC	:	
for All of the Necessary Authority, Approvals	:	Docket No. A-2026-3062675
and Certificate of Public Convenience to	:	
Begin to Offer, Render, Furnish and/or	:	
Supply Transmission Service in portions of	:	File Electronically
Franklin County, Pennsylvania Necessary to	:	
Operate Transmission Facilities for Project	:	
9A West; and for any Other Approvals	:	
Necessary	:	

PETITION TO INTERVENE OF COALITION TO PROTECT FRANKLIN COUNTY

The Coalition to Protect Franklin County (“CTPFC”), pursuant to 52 Pa. Code § 57.75(d), files this Petition to Intervene in the above-captioned Application. In support of its Petition to Intervene, CTPFC avers as follows:

1. The name and contact information of the Protestant is as follows:

Lori Rice, President
Coalition to Protect Franklin County
1430 Henry Lane
Chambersburg, PA 17202
Email: hs.salonandwellness@gmail.com
Telephone: (717) 977-7000

2. The name and contact information of Protestant’s attorney is:

Benjamin C. Dunlap, Jr., Esquire
Cohen Seglias Pallas Greenhall & Furman, PC
240 North Third Street, 7th Floor
Harrisburg, PA 17101
Email: bdunlap@cohenseglias.com
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3. CTPFC is a Pennsylvania non-profit corporation, formed in September 2024, whose mission includes the “goal to forever preserve and protect the richest, most beautiful and highly productive farms lands of Franklin County” and to “maintain a healthy environment and a long-term, sustainable, agricultural economy.”

4. The individuals involved in CTPFC are homeowners, farmers and business owners in Franklin County whose properties would be permanently affected by the construction of the high-voltage electricity transmission line proposed by Transource Pennsylvania, LLC (“Transource”), known as “Project 9A West.”

5. The Commission may not grant the Application for a Certificate of Public Convenience (“CPC”) unless it finds “that the granting of such certificate is necessary or proper for the service, accommodation, convenience, or safety of the public.” 66 Pa. C.S. § 1103(a). To do so, Transource must demonstrate that it possesses the technical, financial and legal fitness to provide electric transmission service and operate transmission facilities in Franklin County. *Seaboard Tank Lines, Inc. v. Pa. Public Utility Comm’n*, 502 A.2d 762 (Pa. Cmwlth. 1985). Fitness itself encompasses three sub-components: technical capacity to meet the need in a satisfactory fashion; financial ability to give reliable and responsible service; and a propensity to operate safely and legally (legal fitness). *In re Evansburg Water Co.*, 81 Pa. P.U.C. 152 (Pa. P.U.C. 1994).

6. The interests and rights of the Protestant are shown by its Board being comprised of farmers, residents and business owners through whose property the proposed transmission right-of-way will traverse. These persons have an individual right to intervene in this proceeding pursuant to 52 Pa. Code § 57.75(d).

7. CTPFC, having Board members owning property that would be traversed by the proposed right-of-way, has a right to intervene in this proceeding on behalf of those Board members. *Energy Conservation Council of Pa. v. Pa. Public Utility Comm’n*, 995 A.2d 465, 475-477 (Pa. Cmwlth. 2010) (An association may have standing as a representative of its

members as long as that organization has at least one member who has or will suffer a direct, immediate and substantial injury to their interests as a result of the challenged action.).

8. CTPFC members whose property would be traversed by the proposed HV power line will suffer a direct, immediate and substantial injury to their interests as a result of decreased property values and interference with their business operations and homes, therefore meeting the criteria for standing.

9. CTPFC would raise the following objections in this proceeding:

(a) Through heavy-handed negotiation tactics and a failure to provide accurate, complete information to landowners, as well as the selective use of its financial resources to buy off opposition, Transource has failed to demonstrate the required standards of fitness to obtain a certificate of public convenience.

(b) There is a lack of demonstrated need for the project. Residents deserve clear evidence that such a project is truly necessary before local communities are asked to bear its impacts. To date, no compelling evidence has been presented demonstrating a need for this project to ensure electric reliability or provide meaningful benefits.

(c) The proposed route traverses a region already heavily burdened by multiple existing electric transmission corridors and a natural gas transmission corridor. Before imposing additional infrastructure on local communities, existing rights-of-way should be upgraded and more efficiently utilized.

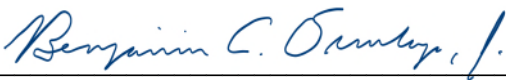
(d) Claims of future rate payer savings remain uncertain and should be carefully evaluated against the substantial costs of constructing, operating and maintaining the project. Any purported benefits must be weighed against the financial burden ultimately borne

by consumers, including the reported approximately \$200 million Transource spent pursuing its earlier Independence Energy Connection Proposal.

WHEREFORE, the Coalition to Protect Franklin County respectfully requests that it be granted leave to intervene in this proceeding.

Respectfully submitted,

**COHEN SEGLIAS PALLAS
GREENHALL & FURMAN PC**

By: 

Benjamin C. Dunlap, Jr., Esquire

Supreme Court I.D. No. 66283

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Counsel for Coalition to Protect Franklin County

Date: July 20, 2026

VERIFICATION

I, Lori Rice, as President of the Coalition to Protect Franklin County, am authorized to make this verification on behalf of the Coalition to Protect Franklin County, and pursuant to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsifications to authority, do state that as President, the facts set forth in the foregoing **Petition to Intervene** are true and correct to the best of my knowledge, information and belief.



Lori Rice
Title: President

Date: 7-18-2026

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Necessary :

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing in the above-captioned proceeding
this day via Electronic Mail and/or First-Class mail to the following:

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/s/Karen L. Gagne

Karen L. Gagne Administrative Assistant to
Benjamin C. Dunlap, Jr., Esquire

Date: July 20, 2026