

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania, LLC :
filed pursuant to 52 Pa. Code Chapter 57, : Docket No. A-2026-3062686
Subchapter G, for Approval of the Siting and :
Construction of the 230 kV Transmission :
Line known as Project 9A West in a Portion : File Electronically
of Franklin County, Pennsylvania :

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
Telephone: (717) 480-5303

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. In order to obtain approval for the siting and construction of its proposed transmission line, Transource must prove (a) the safety of the proposed HV line, (b) the impact and efforts which have been and will be made to minimize the impact of the proposed HV line on specified environmental and cultural assets; and (c) the availability of reasonable alternative routes. 52 Pa. Code § 57.75(e)(2)-(4).

6. 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 an interest as a result of the challenged action.).

7. CTPFC members whose property would be traversed by the proposed HV power line would 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.

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

- a. Threats to farms in rural communities.
- b. Impact on property values.
- c. Damage to preserved farmland.

- d. Irreparable impact on the scenic and rural character of the area.
- e. Environmental concerns.
- f. Health and quality-of-life concerns.
- g. Failure to utilize existing infrastructure instead of constructing a new HV transmission line.

9. Furthermore, the interests of CTPFC Board members that would be directly affected are not adequately represented by existing participants, and the Petitioner's Board members would be bound by the actions of the Commission in this proceeding.

WHEREFORE, the Coalition to Protect Franklin County respectfully requests this Honorable Commission grant it leave to intervene in this proceeding.

Respectfully submitted,

**COHEN SEGLIAS PALLAS
GREENHALL & FURMAN PC**

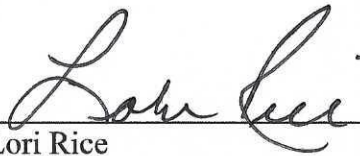
By: 
Benjamin C. Dunlap, Jr., Esquire
Supreme Court I.D. No. 66283
240 North 3rd Street, 7th Floor
Harrisburg, PA 17101
Telephone: (717) 480-5303
Email: bdunlap@cohenseglias.com

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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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:

John F. Povilaitis, Esquire
Alan M. Seltzer, Esquire
Buchanan Ingersoll & Rooney
409 North Second Street, Suite 500
Harrisburg, PA 17101-1357
John.Povilaitis@bipc.com
Alan.Seltzer@bipc.com

Jacob Guthrie, Esquire
Melanie Joy El Atieh, Esquire
Josiah B. Harmar, Esquire
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101
jguthrie@paoca.org
melatieh@paoca.org
jharmar@paoca.org

Jessica Cano, Esquire
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
jacano@aep.com

NazAarah Sabree
Office of Small Business Advocate
555 Walnut Street
1st Floor Forum Place
Harrisburg, PA 17101
Ra-sba@pa.gov

Alison Kaster, Esquire
Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
2nd Floor, Room N201
Harrisburg, PA 17120
akaster@pa.gov

Mandy Mitchell
818 Brookens Road
Fayetteville, PA 17222
vanillagravity@hotmail.com

Seth A. Mendelsohn, Esquire
Saxton & Stump
4250 Crums Mills Road, Suite 201
Harrisburg, PA 17112
smendelsohn@saxtonstump.com

/s/Karen L. Gagne

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

Date: July 20, 2026