

**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 :

PROTEST OF COALITION TO PROTECT FRANKLIN COUNTY

The Coalition to Protect Franklin County (“CTPFC”), pursuant to 52 Pa. Code § 5.51 *et seq.*, files this Protest to the above-captioned Application. In support of its Protest, 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. 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 demonstrated by its Board members who are owners of property through which property the proposed transmission right-of-way will traverse.

7. CTPFC states the following grounds for its Protest:

(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 to 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 expended by Transource in pursuing its earlier Independence Energy Connection Proposal.

8. The following facts establish the Protestant's standing to protest the Application:

(a) Transource has not demonstrated its legal fitness to provide electric transmission service in Franklin County through its landowner outreach and acquisition practices. Many landowners have reported concerns regarding project communications, requests for property access and easement negotiations. Residents deserve complete, accurate, and transparent information when making decisions that will permanently affect their property rights.

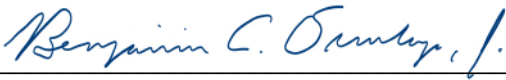
(b) Transource has used its financial resources (at the expense of ratepayers) to suppress the will of the people of Franklin County by buying off resistance to the project. Transource offered a payout to an opposition group. It was turned down. But Transource did succeed in overcoming the resistance of the Franklin County Commissioners, making an

arrangement for them to withdraw their opposition in return for a multimillion-dollar payoff, even though the voters of Franklin County opposed this project.

WHEREFORE, the Coalition to Protect Franklin County respectfully request that this Honorable Commission deny the Application of Transource Pennsylvania, LLC for a Certificate of Public Convenience.

Respectfully submitted,

**COHEN SEGLIAS PALLAS
GREENHALL & FURMAN PC**

By: 

Benjamin C. Dunlap, Jr., Esquire

Supreme Court I.D. No. 66283

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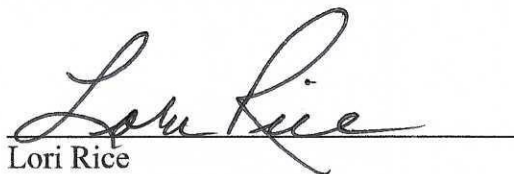
Email: bdunlap@cohenseglias.com

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 **Protest of the Coalition of Franklin County** are true and correct to the best of my knowledge, information and belief.

A handwritten signature in cursive script, reading "Lori Rice", written over a horizontal line.

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:

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/s/Karen L. Gagne

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

Date: July 20, 2026