

**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 :

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 the 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 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.

6. 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).

7. Protestant states the following as the grounds of its Protest:

- 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.

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

- a. Agriculture is the backbone of Franklin County’s economy and identity.

The construction of a major transmission line through productive farmland and scenic rural

landscapes threatens these economic assets and the livelihoods they support. Specifically, high voltage power lines interrupt business operations, limit infrastructure expansion, detrimentally affect cattle from stray voltage, limit easement and curtilage access, have a detrimental effect on precision farming equipment and GPS-guided planting, interfere with fertilizing, spraying, and harvesting equipment operations, and pose safety hazards for workers.

b. The project threatens the value, marketability and future use of affected properties. As market values decline, local municipalities may also experience negative impacts to their tax base and long-term economic stability.

c. Pennsylvania taxpayers have invested millions of dollars to preserve agricultural land for future generations. Those protections should not be undermined by infrastructure projects that provide no clear benefit to the communities being affected.

d. The construction of large transmission structures would permanently alter the scenic view sheds and rural character that have defined this region. Financial compensation cannot fully replace the loss of these community and landscape resources.

e. The project has the potential to impact streams, wetlands, forests, wildlife habitats, agricultural soils and other natural resources. These impacts deserve scrutiny and should not be accepted without clear and substantial public benefit.

f. The placement of high-voltage transmission lines near homes, farms, schools and businesses raise significant concerns regarding public health, safety and quality of life. Residents should not be required to bear these risks when the project provides little or no demonstrated local benefit.

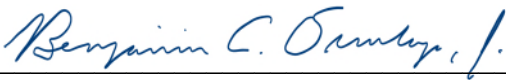
g. The proposed route traverses a region already heavily burdened by multiple existing electric transmission corridors and a natural gas transmission corridor. Before

imposing additional infrastructure in local communities, existing rights-of-way should be upgraded and more efficiently utilized.

WHEREFORE, the Coalition to Protect Franklin County respectfully requests that this Honorable Commission deny the Application of Transource Pennsylvania, LLC, for the siting and construction of the 230 kV transmission line known as Project 9A West.

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



Lori Rice
Title: President

Date: 7-18-2026

**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 :

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