Date: 7/18/26

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

RE: Transource Pennsylvania, LLC's Zoning Exemption Petition in Greene Township, Franklin County
Docket No. P-2026-3062687
FORMAL ANSWER AND PROTEST / REQUEST TO HOLD IN ABEYANCE

Dear Secretary Homsher:

I am writing to file a formal Protest and Answer to the Petition of Transource Pennsylvania, LLC for Confirmation of an Exemption from Local Zoning Regulation in Greene Township. I request that the Commission deny this petition, or, in the alternative, immediately hold this matter in abeyance until Transource's core CPC Application (Docket No. A-2026-3062675) is fully and finally decided by the Commission.

Under Section 619 of the Pennsylvania Municipalities Planning Code (MPC), zoning exemptions are strictly limited to verified public utilities. Because Transource's provisional certificate to operate in Franklin County was previously rescinded, it does not currently qualify as a public utility in our territory. Under the Commission's clear direction in the MARL Interlocutory Order (June 1, 2026), reaching the merits of a zoning exemption before a utility is formally certificated represents a procedural mismatch that violates public due process.

Should this petition ever be reviewed on its merits, I strongly object to it on the following grounds:

1. Subversion of Local Democratic Control: Transource is actively attempting to strip away local municipal zoning authority over building, staging, and construction configurations for a massive 33-acre substation facility. This represents an unacceptable corporate overreach that tramples on Greene Township's historic municipal ordinances and municipal planning rights.

2. Mandatory Public Hearing Requirement: Under Section 619 of the MPC, the public hearing requirement regarding the specific situation of the building in question is mandatory. Greene Township and its local residents have an absolute right to appear,

present expert witnesses, and cross-examine Transource on the witness stand regarding the safety, noise, and visual necessity of the Rice Substation control module.

I respectfully request that the Administrative Law Judges enforce the law, put this petition on hold until the CPC docket is decided, and subsequently schedule the mandatory local public hearings to preserve Greene Township's planning rights.

Respectfully submitted,

Signature: _____

Name: Andrew Newman

Address: 493 Sollenberger Rd Chambersburg PA 17202

UPI / Tax Parcel ID Number: _____