

Date: 7/21/2026

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 Because Transource's provisional certificate to operate in Franklin County was previously rescinded, it does not currently qualify as a public utility in our territory.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,

2. Absolute Failure to Demonstrate Local Benefit: No entity has shown how the multi-million-dollar cost savings claimed by Transource will ever be passed back to a typical Pennsylvania electric customer. The market efficiency savings benefit and are distributed among power marketers and financial institutions in receiving states, while local consumers bear the added rate burdens.

3. Gross Misuse of Capital: Transource has reportedly spent over \$200 million on a decade of failed litigation regarding the old Project 9A without laying a single foot of line. Funneling capital into prolonged legal challenges against state-level denials, and using funds to pay off opposition groups, shows a systemic lack of stewardship.

Transource is a for-profit corporation seeking to abuse the power of eminent domain for a market efficiency project that is not a public necessity. I request that the Commission send this CPC application to the Office of Administrative Law Judge for full, in-person Public Input Hearings so that the public can address Transource's fitness firsthand.

Respectfully submitted,

Signature: Jennifer Culbertson

Name: Jennifer Culbertson

Address: 7599 Nyesville Rd. Chbg. PA 17202

UPI / Tax Parcel ID Number (If Landowner): _____