



GUILFORD TOWNSHIP SUPERVISORS

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July 30, 2026

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

RE: Transource Pennsylvania, LLC's Certificate of Public Convenience Application for Franklin County

Docket No. A-2026-3062675

Formal Protest and Objection to Motion for Consolidation

Dear Secretary Homsher:

The Board of Supervisors of Guilford Township, Franklin County, Pennsylvania, hereby submits this Formal Protest to the application of Transource Pennsylvania, LLC for a Certificate of Public Convenience (CPC) to operate transmission facilities and provide transmission service within Franklin County. The Township also respectfully objects to Transource's Motion for Consolidation.

As a municipal government charged with protecting the public health, safety, welfare, property rights, and orderly land use within Guilford Township, the Township has a substantial governmental interest in these proceedings. Before the Commission considers transmission line routing, siting, or related land-use issues, it should first determine whether Transource has established that it is entitled to receive a Certificate of Public Convenience to operate within the proposed service territory.

Consistent with the Commission's interlocutory order in the MARL proceeding (Docket No. A-2026-3060856, entered June 1, 2026), the threshold issue of corporate fitness and entitlement to a Certificate of Public Convenience should be fully adjudicated before separate siting or routing proceedings are considered. Consolidating these matters would require municipalities and affected property owners to litigate routing issues before the Commission has determined whether the applicant possesses the legal authority to provide the proposed service. Such a process unnecessarily burdens local governments and raises significant due process concerns.

Accordingly, Guilford Township respectfully requests that the Commission deny Transource's Certificate of Public Convenience application based upon the following concerns regarding corporate fitness and public necessity.

1. Escalating and Excessive Project Costs

Transource's 2026 application estimates the western transmission segment at approximately **\$231.3 million**. Of that amount, approximately **\$112.7 million** represents construction and planning costs, while the balance reflects financing costs, taxes, escalation, and inflation associated with years of project delay. The Township questions whether such substantially increased costs represent prudent utility planning or satisfy the statutory standard of public necessity.

2. Failure to Demonstrate Direct Public Benefit

The application has not demonstrated that the projected market efficiency savings will produce measurable benefits for the residents, businesses, and electric customers of Guilford Township or Franklin County. While regional wholesale market participants may realize economic benefits, the Township remains concerned that local communities will bear the burdens associated with transmission infrastructure without corresponding, identifiable public benefits.

3. Concerns Regarding Corporate Fitness and Stewardship

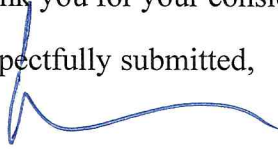
Publicly available information indicates that Transource has expended substantial financial resources over approximately a decade pursuing litigation associated with the former Project 9A without constructing the proposed facilities. This history raises legitimate questions regarding corporate stewardship, prudent management, and whether the applicant has demonstrated the fitness expected of a public utility seeking the extraordinary authorities associated with a Certificate of Public Convenience, including the potential exercise of eminent domain.

Guilford Township has a duty to protect its residents, agricultural resources, municipal planning objectives, and tax base. The Township believes that these interests warrant careful consideration before any entity is granted the authority to operate as a public utility within Franklin County.

For these reasons, the Board of Supervisors respectfully requests that the Pennsylvania Public Utility Commission deny Transource Pennsylvania, LLC's application for a Certificate of Public Convenience. Alternatively, should the Commission decline to deny the application, the Township requests that the matter be referred to the Office of Administrative Law Judge for formal, in-person Public Input Hearings in Franklin County and that the Motion for Consolidation be denied so that the threshold issues of corporate fitness and public necessity are resolved before any transmission line siting proceedings are undertaken.

Thank you for your consideration of Guilford Township's Formal Protest.

Respectfully submitted,



Don Clapper

Chairman, Guilford Township Board of Supervisors