



GUILFORD TOWNSHIP SUPERVISORS

115 Spring Valley Road
Chambersburg, Pennsylvania 17202
(717) 264-6626 (Supervisors)
(717) 264-0077 (Zoning)

e-mail: gtsups@guilfordtwp.us (Supervisors)
Website: www.guilfordtwp.us

SUPERVISORS

Don Clapper, *Administrative Officer*
Greg Thomas, *Roadmaster*
Mike Ferguson, *Norlo Maintenance Manager*

Shannon Malott, *Secretary/Treasurer*
Bill Green, *Zoning Officer*
Pat Holden, *Assistant Zoning Officer/GIS*

July 30, 2026

VIA ELECTRONIC FILING AND/OR U.S. MAIL

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

RE: Application of Transource Pennsylvania, LLC for All Necessary Authority, Approvals and Certificate of Public Convenience (CPC) to Begin to Offer, Render, Furnish and/or Supply Transmission Service in Portions of Franklin County, Pennsylvania
Docket No. A-2026-3062686

Dear Secretary Homsher:

Enclosed for filing please find the **Petition to Intervene of Guilford Township Supervisors, Guilford Township, Franklin County, Pennsylvania**, together with the supporting **Resolution Authorizing Intervention** adopted by the Guilford Township Board of Supervisors.

Guilford Township respectfully requests that the Pennsylvania Public Utility Commission grant intervention and recognize the Township as a full party to this proceeding. The Township seeks to participate in all appropriate phases of this matter, including discovery, evidentiary proceedings, briefing, and any other proceedings before the Commission.

The Township's intervention is necessary to ensure that local governmental interests, including impacts to Township residents, property owners, municipal infrastructure, land use planning, public safety, and community resources, are fully considered.

Please docket this filing accordingly and provide all future notices and communications regarding this proceeding to the undersigned.

Respectfully submitted,

Don Clapper
Chairman, Guilford Township Board of Supervisors

Enclosure
Cc: All Parties of Record

Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania, LLC :
for All of the Necessary Authority, Approvals : Docket No.A-2026-3062686:
and Certificate of Public Convenience to :
Begin to Offer, Render, Furnish and/or : File Electronically
Supply Transmission Service in portions of
Franklin County, Pennsylvania Necessary to :
Operate Transmission Facilities for Project :
9A West; and for any Other Approvals :
Necessary :

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
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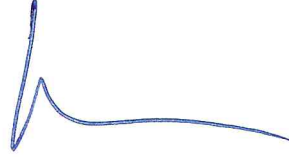
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1 Riverside Plaza, 29th Floor
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Don Clapper, Chairman
Guilford Township Board of Supervisors

Date: July 30, 2026

Resolution

RESOLUTION NO. 2026-10

**GUILFORD TOWNSHIP
FRANKLIN COUNTY, PENNSYLVANIA**

**A RESOLUTION OF THE GUILFORD TOWNSHIP BOARD OF SUPERVISORS
AUTHORIZING THE FILING OF A PETITION TO INTERVENE BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION IN DOCKET NO. A-2026-3062686
REGARDING THE PROPOSED PROJECT 9A WEST 230 kV TRANSMISSION LINE**

WHEREAS, Guilford Township is a township of the second class organized and existing under the laws of the Commonwealth of Pennsylvania; and

WHEREAS, the Board of Supervisors is charged with protecting the public health, safety, welfare, and property interests of the Township and its residents; and

WHEREAS, Transource Pennsylvania, LLC has filed an Application with the Pennsylvania Public Utility Commission ("Commission") at Docket No. A-2026-3062686 seeking approval to site and construct the proposed Project 9A West 230 kV electric transmission line within portions of Franklin County, including areas that may affect Guilford Township; and

WHEREAS, the proposed transmission facilities may affect agricultural lands, municipal roads, emergency services, land use planning, environmental resources, groundwater and karst features, municipal infrastructure, property owners, and the overall character and welfare of Guilford Township; and

WHEREAS, the Board of Supervisors has determined that Guilford Township possesses a direct, substantial, and immediate governmental interest in the Commission's review of the proposed project and that the Township's interests are separate and distinct from those of individual property owners and other participants; and

WHEREAS, the Board of Supervisors believes it is in the best interests of the Township and its residents to participate as a party in the Commission proceedings in order to present evidence, protect municipal interests, and ensure that the Commission develops a complete record regarding localized impacts of the proposed project; and

WHEREAS, the Board further believes that the Commission should defer consideration of the siting application until the antecedent Certificate of Public Convenience proceeding at Docket No. A-2026-3062675 has been finally resolved.

NOW, THEREFORE, BE IT RESOLVED by the Board of Supervisors of Guilford Township, Franklin County, Pennsylvania, as follows:

SECTION 1. AUTHORIZATION TO INTERVENE.

The Board of Supervisors hereby authorizes Guilford Township to file a Petition to Intervene before the Pennsylvania Public Utility Commission ("Commission") in Docket No. A-2026-3062686 and to participate as a full party in all proceedings relating to that matter.

SECTION 2. PROTECTION OF MUNICIPAL INTERESTS

The Township shall participate in the proceeding for the purpose of protecting the public health, safety, welfare, and governmental interests of Guilford Township and its residents, including, but not limited to, issues involving public infrastructure, transportation, emergency services, agricultural preservation, environmental resources, groundwater and karst geology, stormwater management, land use planning, municipal operations, property owners, and other localized impacts within the Township.

SECTION 3. REQUEST FOR PROCEDURAL RELIEF

The Board authorizes the Township to request that the Commission hold the siting proceeding in abeyance pending final resolution of the related Certificate of Public Convenience proceeding at Docket No. A-2026-3062675 and to seek such other procedural or substantive relief as legal counsel determines appropriate to protect the Township's interests.

SECTION 4. AUTHORITY TO EXECUTE AND FILE DOCUMENTS

The Chairman of the Board of Supervisors, together with the Township Solicitor or other legal counsel retained by the Township, is hereby authorized to execute, verify, file, and amend the Petition to Intervene and any pleadings, motions, responses, briefs, affidavits, certifications, verifications, stipulations, or other documents necessary or appropriate in connection with the Commission proceedings.

SECTION 5. PARTICIPATION IN PROCEEDINGS

The Township is authorized to participate fully in all phases of the proceeding, including discovery, evidentiary hearings, technical conferences, mediation, settlement discussions, briefing, oral argument, petitions for reconsideration, appeals, remand proceedings, and any related administrative or judicial proceedings arising from or connected with Docket No. A-2026-3062686.

SECTION 6. RESERVATION OF RIGHTS

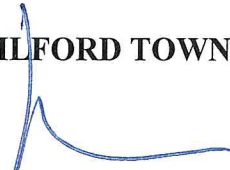
Nothing contained in this Resolution shall be construed as limiting or waiving any right, claim, objection, remedy, or procedural protection available to Guilford Township under applicable federal or state law, Commission regulations, or the rules governing administrative or judicial proceedings. The Township expressly reserves all such rights.

SECTION 7. EFFECTIVE DATE

This Resolution shall take effect immediately upon its adoption

RESOLVED AND ADOPTED this 16th day of July, 2026, by the Board of Supervisors of Guilford Township, Franklin County, Pennsylvania.

GUILFORD TOWNSHIP BOARD OF SUPERVISORS


Don Clapper, Chairman



Attest:



Shannon Malott, Secretary

Petition to Intervene



GUILFORD TOWNSHIP SUPERVISORS

115 Spring Valley Road
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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Transource Pennsylvania, LLC filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for Approval of the Siting and Construction of the 230 kV Transmission Line Known as Project 9A West in a Portion of Franklin County, Pennsylvania

Docket No. A-2026-3062686

PETITION TO INTERVENE OF GUILFORD TOWNSHIP SUPERVISORS, GUILFORD TOWNSHIP, FRANKLIN COUNTY, PENNSYLVANIA

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to 52 Pa. Code §§ 5.71–5.76, the **Guilford Township Supervisors**, acting on behalf of Guilford Township, Franklin County, Pennsylvania ("Petitioner"), hereby file this formal Petition to Intervene in the above-captioned proceeding and, in support thereof, respectfully represent as follows:

1. Petitioner is the duly elected governing body of **Guilford Township, Franklin County, Pennsylvania**, a municipal corporation organized and existing under the laws of the Commonwealth of Pennsylvania. Guilford Township has governmental responsibilities and interests involving land use planning, municipal infrastructure, public safety, agricultural preservation, environmental resources, and the protection of the health, welfare, and quality of life of its residents.
2. Service of all pleadings, notices, orders, filings, and communications in this proceeding should be directed to:

Guilford Township Supervisors
115 Spring Valley Rd
Chambersburg, Pennsylvania 17202
Email: GTSups@guilfordtwp.us

3. Guilford Township's interest in this proceeding is direct, substantial, and immediate. The proposed **230 kV Project 9A West transmission line**, as proposed by Transource Pennsylvania, LLC under Docket No. A-2026-3062686, may directly affect properties, agricultural operations, municipal resources, transportation systems, emergency response

considerations, environmental resources, and the future land-use planning objectives of Guilford Township.

4. The Township has a unique governmental interest in ensuring that the Commission's review includes a complete and localized record regarding the impacts of the proposed transmission facilities within the Township. These interests are separate and distinct from those of individual ratepayers or members of the general public and cannot be adequately represented by other participants.
5. Guilford Township respectfully requests that this siting proceeding be held in abeyance until the antecedent Certificate of Public Convenience ("CPC") Application filed by Transource Pennsylvania, LLC at **Docket No. A-2026-3062675** is finally decided.
6. The Township asserts that proceeding with the merits of the siting application before resolution of the underlying CPC application may require municipal officials, residents, and affected property owners to engage in extensive and costly litigation concerning routing and construction issues before the Commission has determined whether the proposed service authority should be granted.
7. Consistent with the Commission's **MARL Interlocutory Order, Docket No. A-2026-3060856 (June 1, 2026)**, Guilford Township respectfully asserts that the Commission should fully consider and resolve the threshold CPC issues before proceeding with final consideration of the transmission line siting application.
8. If this docket proceeds on the merits, the proposed permanent placement of transmission structures and associated rights-of-way may result in significant and long-term impacts within Guilford Township, including impacts to agricultural lands, municipal planning objectives, roadway and emergency access considerations, environmental resources, property values, and community character.
9. Guilford Township's participation is necessary to develop a complete record concerning localized issues, including potential impacts to natural resources, groundwater and karst conditions, agricultural operations, infrastructure, and the Township's obligations under Pennsylvania law to protect the interests of its residents.
10. Guilford Township's interests will be directly, uniquely, and substantially affected by any final Commission order approving, modifying, or denying the proposed Project 9A West transmission line siting application.

WHEREFORE, the Guilford Township Supervisors respectfully request that the Pennsylvania Public Utility Commission:

- a. Grant this Petition to Intervene;
- b. Recognize Guilford Township Supervisors as a full party in this proceeding;
- c. Permit Guilford Township to participate fully in discovery, evidentiary hearings, briefing, and all other proceedings before the Commission;

d. Hold this siting proceeding in abeyance pending final resolution of the CPC Application at Docket No. A-2026-3062675; and

e. Grant such other and further relief as the Commission deems just and appropriate.

Respectfully submitted,

Don Clapper

Chairman, Guilford Township Board of Supervisors

Date: July 30, 2024

On behalf of:

**Guilford Township Supervisors
Guilford Township, Franklin County, Pennsylvania**

VERIFICATION

I, **Don Clapper**, being duly authorized to act on behalf of the Guilford Township Board of Supervisors, hereby state that the facts set forth in the foregoing Petition to Intervene are true and correct to the best of my knowledge, information, and belief. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to Unsworn Falsification to Authorities).

Date: July 30, 2024

Don Clapper

Chairman, Guilford Township Board of Supervisors

Statement of Concerns

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Transource Pennsylvania, LLC filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for Approval of the Siting and Construction of the 230 kV Transmission Line Known as Project 9A West in a Portion of Franklin County, Pennsylvania

Docket No. A-2026-3062686

STATEMENT OF CONCERNS AND PRELIMINARY ISSUES OF GUILFORD TOWNSHIP SUPERVISORS

GUILFORD TOWNSHIP, FRANKLIN COUNTY, PENNSYLVANIA

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

The Guilford Township Supervisors ("Township"), by and through its governing body, respectfully submit this Statement of Concerns and Preliminary Issues regarding the Application of Transource Pennsylvania, LLC ("Transource") for approval of the siting and construction of the proposed **230 kV Project 9A West Transmission Line** in portions of Franklin County, Pennsylvania.

The Township submits this statement to identify issues requiring careful review by the Pennsylvania Public Utility Commission ("Commission") and to ensure that the local governmental interests of Guilford Township, its residents, property owners, agricultural operators, and affected communities are fully considered in the evidentiary record.

I. REQUEST FOR SEQUENCED REVIEW OF CPC AND SITING APPLICATIONS

1. Guilford Township respectfully requests that the Commission recognize the importance of resolving the underlying Certificate of Public Convenience ("CPC") proceeding at **Docket No. A-2026-3062675** before proceeding to final determination of the Project 9A West siting application.
2. The Township asserts that the need, public convenience, and public necessity for the proposed transmission service should be fully established before the Commission authorizes the specific location, routing, and construction impacts associated with the proposed facilities.
3. Proceeding with detailed siting litigation before resolution of the CPC application may impose substantial burdens on municipalities, property owners, and affected residents before the fundamental question of authorization has been determined.

II. AGRICULTURAL LAND AND FARMING OPERATIONS

4. Guilford Township contains significant agricultural areas that contribute to the Township's economy, rural character, and community identity.

5. The Township is concerned regarding potential impacts of the proposed transmission line and associated rights-of-way, including:
 - a. Permanent loss or fragmentation of productive agricultural land;
 - b. Interference with farming operations and equipment movement;
 - c. Soil compaction and alteration of soil structure from construction activities;
 - d. Drainage changes and erosion impacts;
 - e. Restrictions on future agricultural use within transmission corridors; and
 - f. Impacts to precision agriculture practices, including GPS-guided farming systems.
6. The Commission should require a detailed assessment of agricultural impacts and appropriate mitigation measures before approving construction.

III. GEOLOGY, KARST CONDITIONS, AND GROUNDWATER RESOURCES

7. Guilford Township has concerns regarding the potential presence of karst geology, sinkhole-prone areas, fractured bedrock, groundwater pathways, and other subsurface conditions that may affect the safety and feasibility of construction.
8. The Township requests a thorough evaluation of:
 - a. Foundation excavation impacts;
 - b. Ground disturbance associated with access roads and staging areas;
 - c. Potential effects on groundwater movement;
 - d. Potential impacts to private wells and water supplies; and
 - e. Long-term structural stability of transmission facilities.
9. The Commission should require site-specific geological and hydrological analysis rather than relying solely upon generalized corridor assessments.

IV. ENVIRONMENTAL AND NATURAL RESOURCE IMPACTS

10. The Township is concerned regarding potential impacts to natural resources, including streams, wetlands, woodlands, wildlife habitat, and other environmentally sensitive areas.
11. The Commission should evaluate whether the proposed project complies with Pennsylvania's constitutional environmental protections, including the principles

recognized under **Article I, Section 27 of the Pennsylvania Constitution**, commonly referred to as the Environmental Rights Amendment.

12. The Township requests that the Commission consider whether reasonable alternatives, mitigation measures, and routing modifications could reduce environmental impacts.

V. PROPERTY RIGHTS AND COMMUNITY IMPACTS

13. The Township recognizes that many private property owners may experience significant impacts from proposed easements, rights-of-way, construction activities, and permanent transmission infrastructure.

14. Potential impacts include:

- a. Reduction in property value;
- b. Changes to land use opportunities;
- c. Visual and aesthetic impacts;
- d. Noise impacts;
- e. Construction disruption; and
- f. Long-term restrictions affecting property owners.

15. The Township requests that the Commission fully consider the cumulative impacts on affected property owners and neighborhoods.

VI. PUBLIC SAFETY AND MUNICIPAL INFRASTRUCTURE

16. Guilford Township has concerns regarding impacts to municipal infrastructure and public safety, including:

- a. Increased construction traffic;
- b. Heavy equipment use on Township roads;
- c. Road degradation and repair responsibilities;
- d. Emergency response access;
- e. Coordination with fire, police, and emergency medical services; and
- f. Public notification and safety procedures during construction.

17. The Township requests that Transource provide detailed construction management plans addressing transportation, emergency response, and restoration responsibilities.

VII. CONSTRUCTION MANAGEMENT AND RESTORATION REQUIREMENTS

18. Before approval of construction activities, the Township requests that the Commission require:

- a. Detailed construction schedules;
- b. Identification of staging areas and access routes;
- c. Procedures for minimizing impacts to residents and farms;
- d. Soil restoration standards;
- e. Drainage restoration plans;
- f. Road protection and repair agreements; and
- g. Procedures for addressing construction-related complaints.

VIII. PRELIMINARY ISSUES FOR COMMISSION REVIEW

Based upon the foregoing, Guilford Township identifies the following preliminary issues requiring investigation:

- 1. Whether the proposed Project 9A West transmission line is consistent with public convenience, necessity, and welfare;
- 2. Whether the proposed route minimizes impacts to agricultural lands, residents, and natural resources;
- 3. Whether alternative routes or configurations would reduce community impacts;
- 4. Whether Transource has adequately evaluated geological, environmental, and construction risks;
- 5. Whether sufficient mitigation measures have been proposed;
- 6. Whether municipal infrastructure and emergency services will be adequately protected;
- 7. Whether affected property owners will receive appropriate protections and consideration; and
- 8. Whether the Commission should defer final siting approval until resolution of the related CPC proceeding.

IX. CONCLUSION

Guilford Township respectfully requests that the Commission consider these concerns as part of the evidentiary record and require a comprehensive review of all municipal, environmental, agricultural, infrastructure, and property-related impacts associated with Project 9A West.

The Township reserves the right to supplement this Statement as additional information becomes available through discovery, technical review, public input, and further proceedings before the Commission.

Respectfully submitted,

Date: July 30, 2024

Chairman

Guilford Township Board of Supervisors

Name: [Signature]

On behalf of:

Guilford Township Supervisors

Guilford Township, Franklin County, Pennsylvania