



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

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

RE: Transource Pennsylvania, LLC's Siting Application for Project 9A West – Franklin County
Docket No. A-2026-3062686
Formal Protest and Request to Hold Proceeding in Abeyance

Dear Secretary Homsher:

On behalf of the **Guilford Township Board of Supervisors**, Franklin County, Pennsylvania, we respectfully submit this Formal Protest to the Application of Transource Pennsylvania, LLC seeking approval for the siting and construction of the proposed Project 9A West 230 kV transmission line.

The Board respectfully requests that the Pennsylvania Public Utility Commission deny the Application or, in the alternative, immediately hold this siting proceeding in abeyance until the Commission has rendered a final decision on Transource's Application for a Certificate of Public Convenience at Docket No. A-2026-3062675.

As the elected governing body of Guilford Township, the Board has a responsibility to safeguard the health, safety, welfare, agricultural economy, environmental resources, and property interests of Township residents. Proceeding with a siting application before the threshold issue of Transource's authority to construct and operate transmission facilities in Franklin County has been resolved unnecessarily places local governments, property owners, and taxpayers in the position of participating in extensive proceedings that may ultimately prove unnecessary.

The Commission's recent MARL Interlocutory Order (June 1, 2026) recognized that a transmission siting application filed concurrently with a Certificate of Public Convenience application is legally premature. Because Transource does not presently possess certificate authority within Franklin County, the Board believes that consideration of the siting application should be suspended pending final resolution of the CPC proceeding. Proceeding otherwise raises significant due process concerns for affected municipalities and landowners.

Should the Commission ultimately consider the merits of the Application, the Board respectfully urges its denial for the following reasons:

1. Karst Geology and Public Safety

Transource has acknowledged in its 2026 filings that it was required to relocate its proposed 33-acre Rice Substation because of "significant karst formations present under the property" that threatened the site's structural integrity. Guilford Township is characterized by extensive limestone formations, sinkhole activity, and sensitive groundwater resources. If these geological conditions are sufficiently hazardous to require relocation of a major electrical substation, the construction of a 24.4-mile high-voltage transmission corridor across similar terrain raises serious concerns regarding structural stability, groundwater protection, stormwater management, and long-term public safety.

2. Impacts on Agriculture and Precision Farming

Agriculture remains a vital component of Guilford Township's economy and heritage. Modern farming operations depend upon large GPS-guided planting, spraying, and harvesting equipment operating in efficient field patterns. The permanent placement of transmission towers throughout productive farmland would reduce operational efficiency, increase annual production costs, complicate field management, and impose permanent burdens upon the Township's agricultural community.

3. Environmental Rights Amendment

The Board urges the Commission to carefully fulfill its obligations under Article I, Section 27 of the Pennsylvania Constitution. The proposed transmission corridor has the potential to affect streams, groundwater resources, agricultural soils, wildlife habitat, scenic rural landscapes, and other public natural resources held in trust for present and future generations. These impacts warrant careful constitutional review before any approval is granted.

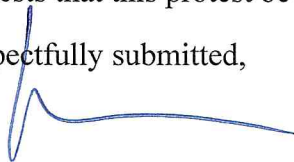
4. Community Character, Noise, and Property Impacts

The introduction of large industrial transmission structures into Guilford Township's predominantly rural landscape would permanently alter community character. High-voltage transmission facilities are capable of producing audible corona discharge—including hissing, crackling, and sizzling sounds—particularly during periods of elevated humidity, fog, or precipitation. These operational impacts may interfere with residents' quiet enjoyment of their properties, negatively affect home-based businesses, and diminish surrounding property values.

For these reasons, the Guilford Township Board of Supervisors respectfully requests that the Commission hold this proceeding in abeyance until the Certificate of Public Convenience proceeding has been finally resolved. If the matter subsequently proceeds, the Board further requests that the Commission conduct on-site inspections and hold public input hearings within Franklin County so that affected municipalities, residents, farmers, and property owners have a meaningful opportunity to present testimony concerning the local impacts of this proposed project.

The Board appreciates the Commission's careful consideration of these concerns and respectfully requests that this protest be entered into the official record.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Don Clapper", with a stylized flourish extending to the right.

Don Clapper

Chairman, Guilford Township Board of Supervisors