



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: Petition of Transource Pennsylvania, LLC for Confirmation of an Exemption from Local Zoning Regulation and for the Construction of Buildings in connection with the Construction of a Proposed Electric Substation in Greene Township, Franklin County, Pennsylvania
Docket No. P-2026-3062687

Dear Secretary Homsher:

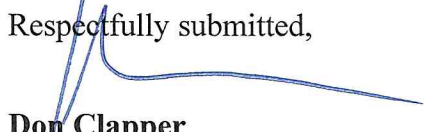
Enclosed for filing please find the **Petition to Intervene of Guilford Township Supervisors, Guilford Township, Franklin County, Pennsylvania**, together with the supporting **Resolution Authorizing Intervention** adopted by the Guilford Township Board of Supervisors.

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**

Petition of Transource Pennsylvania, LLC	:	
for Confirmation of an Exemption from	:	Docket No.P-2026-3062687:
Local Zoning Regulation and for the	:	
Construction of Buildings in connection with	:	File Electronically
the Construction of a Proposed Electric	:	
Substation in Greene Township, Franklin	:	
County, Pennsylvania	:	
	:	
	:	
	:	

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
Harrisburg, PA 17101-1357
John.Povilaitis@bipc.com
Alan.Seltzer@bipc.com

Jacob Guthrie, Esquire
Melanie Joy El Atieh, Esquire
Josiah B. Harmar, Esquire
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101
jguthrie@paoca.org
melatieh@paoca.org
jharmar@paoca.org

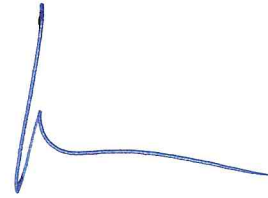
Jessica Cano, Esquire
American Electric Power Service Corporation
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NazAarah Sabree
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4250 Crums Mills Road, Suite 201
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smendelsohn@saxtonstump.com



Don Clapper, Chairman
Guilford Township Board of Supervisors

Date: July 30, 2026

Resolution

RESOLUTION NO. 2026-11

**GUILFORD TOWNSHIP
FRANKLIN COUNTY, PENNSYLVANIA**

A RESOLUTION OF THE GUILFORD TOWNSHIP SUPERVISORS AUTHORIZING INTERVENTION IN PROCEEDINGS BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION REGARDING TRANSOURCE PENNSYLVANIA, LLC'S PETITION FOR CONFIRMATION OF AN EXEMPTION FROM LOCAL ZONING REGULATION AND CONSTRUCTION OF A PROPOSED ELECTRIC SUBSTATION IN GREENE TOWNSHIP, FRANKLIN COUNTY, PENNSYLVANIA

DOCKET NO. P-2026-3062687

WHEREAS, Guilford Township is a municipal corporation organized and existing under the laws of the Commonwealth of Pennsylvania; and

WHEREAS, the Board of Supervisors of Guilford Township is responsible for protecting the health, safety, and welfare of Township residents and for representing the interests of the Township concerning matters affecting land use, infrastructure, public safety, environmental resources, and community character; and

WHEREAS, Transource Pennsylvania, LLC has filed a Petition with the Pennsylvania Public Utility Commission ("Commission") at Docket No. P-2026-3062687 seeking confirmation of an exemption from local zoning regulation and authorization for the construction of buildings associated with a proposed electric substation known as the Rice Substation in Greene Township, Franklin County, Pennsylvania; and

WHEREAS, Transource Pennsylvania, LLC has also filed a related Certificate of Public Convenience ("CPC") application with the Pennsylvania Public Utility Commission at Docket No. A-2026-3062675 concerning the proposed transmission project; and

WHEREAS, although the proposed Rice Substation is located within Greene Township, Franklin County, the proposed facility and related transmission infrastructure may have impacts extending beyond municipal boundaries, including potential impacts upon Guilford Township residents, transportation systems, emergency services, regional development patterns, environmental resources, and community character; and

WHEREAS, the Board of Supervisors recognizes the importance of ensuring that municipalities retain meaningful participation in proceedings involving major utility facilities and that local concerns regarding land use, infrastructure, safety, and environmental impacts are fully considered; and

WHEREAS, the Board of Supervisors believes that the Commission's consideration of a request for exemption from local zoning regulation should occur only after the Commission has

determined whether the underlying CPC application has been approved and whether the proposed project has demonstrated the necessary public convenience and necessity; and

WHEREAS, the Board of Supervisors desires to authorize Guilford Township's participation as an intervenor in Pennsylvania Public Utility Commission Docket No. P-2026-3062687 in order to protect the interests of the Township and its residents.

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 and approves Guilford Township's intervention in the Pennsylvania Public Utility Commission proceeding initiated by Transource Pennsylvania, LLC at Docket No. P-2026-3062687 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 of Supervisors requests that the Pennsylvania Public Utility Commission hold the zoning exemption proceeding in abeyance pending final resolution of the related Certificate of Public Convenience proceeding at Docket No. A-2026-3062675.

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. P-2026-3062687.

SECTION 6. RESERVATION OF RIGHTS

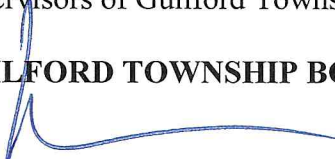
Nothing contained in this Resolution shall be construed as limiting or waiving any right, claim, objection, remedy, or procedural protection available to Guilford Township under applicable federal or state law, Commission regulations, or the rules governing administrative or judicial proceedings. The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

SECTION 7. EFFECTIVE DATE

This Resolution shall become effective immediately upon adoption.

RESOLVED AND ADOPTED this 11th day of July, 2026, by the Board of Supervisors of Guilford Township, Franklin County, Pennsylvania.

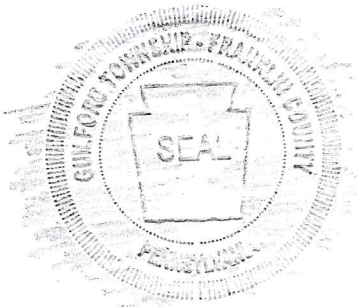
GUILFORD TOWNSHIP BOARD OF SUPERVISORS


Don Clapper, Chairman

Attest:



Shannon Malott, Secretary



Petition to Intervene



GUILFORD TOWNSHIP SUPERVISORS

115 Spring Valley Road
Chambersburg, Pennsylvania 17202
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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

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-2026-3062675

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 Petition to Intervene in the above-captioned proceeding and, in support thereof, respectfully state 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 a direct governmental interest in matters affecting land use, municipal services, public safety, transportation infrastructure, environmental resources, property owners, and the quality of life of its residents.
2. Service of all pleadings, notices, orders, and other communications concerning 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 transmission project and the requested Certificate of Public Convenience may significantly affect property owners, agricultural lands, municipal infrastructure,

emergency response considerations, roadway systems, zoning and land-use planning, and other governmental interests within Guilford Township.

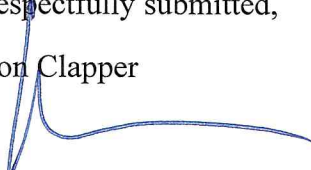
4. Guilford Township possesses interests that are distinct from those of general ratepayers or members of the public. The Township has statutory responsibilities to protect and represent the interests of its residents, manage municipal resources, and participate in proceedings that may have long-term consequences for the community.
5. Guilford Township objects to any consolidation or procedural treatment that would prevent full consideration of the Township's concerns regarding the requested Certificate of Public Convenience. Consistent with the Commission's recent determination in the **MARL Interlocutory Order, Docket No. A-2026-3060856 (June 1, 2026)**, the Commission should fully review and decide the core CPC application before considering the merits of any separate transmission line siting, routing, zoning, or related approvals.
6. Guilford Township will be directly, uniquely, and substantially affected by any final orders entered in this proceeding, including any approvals that may authorize or facilitate construction activities, property acquisition, eminent domain proceedings, or other actions affecting Township residents, municipal operations, and local governmental interests.
7. Intervention by Guilford Township will assist the Commission by providing local governmental knowledge and information regarding the potential impacts of the proposed project within the Township and ensuring that municipal interests are fully represented throughout discovery, hearings, and final deliberations.

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 phases of this proceeding; and
- d. Grant such other and further relief as the Commission deems appropriate.

Respectfully submitted,

Don Clapper


Chairman, Guilford Township Board of Supervisors

Date:  July 30, 2026

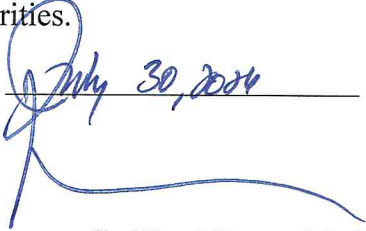
On behalf of:

**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, verify that the statements made 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, 2014

Chairman, Guilford Township Board of Supervisors

Statement of Concerns

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

RE: Petition of Transource Pennsylvania, LLC for Confirmation of an Exemption from Local Zoning Regulation and for the Construction of Buildings in connection with the Construction of a Proposed Electric Substation in Greene Township, Franklin County, Pennsylvania

Docket No. P-2026-3062687

**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, 2026

Chairman

Guilford Township Board of Supervisors

Name: _____

On behalf of:

Guilford Township Supervisors

Guilford Township, Franklin County, Pennsylvania