



1900 Wayne Road
Chambersburg, PA 17202

(717) 263-8282
FAX (717) 263-0662
www.fcadc.com

August 3, 2026

Matthew L. Homsher, Esquire
Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Second Floor
Harrisburg, PA 17120

**RE: Formal Protest of the Franklin County Area Development Corporation
Application of Transource Pennsylvania, LLC for a Certificate of Public
Convenience Docket No. A-2026-3062675**

**Application of Transource Pennsylvania, LLC for Approval of the Siting
and Construction of the Project 9A West 230 kV Transmission Line
Docket No. A-2026-3062686**

**Petition of Transource Pennsylvania, LLC for Confirmation of an
Exemption from Local Zoning Regulation in Greene Township
Docket No. P-2026-3062687**

Dear Secretary Homsher:

On behalf of the Franklin County Area Development Corporation ("FCADC"), and in my capacity as its President, I respectfully submit this formal protest to the three above-referenced applications and petition filed by Transource Pennsylvania, LLC concerning the proposed Rice-Ringgold transmission line, also identified as Project 9A West.

For 40 years, the FCADC has served as Franklin County's principal economic development organization. During that time, we have worked with local municipalities, businesses, agricultural interests and community partners to encourage responsible investment, create and retain family-sustaining employment, preserve the County's economic assets and promote planned, sustainable growth.

Based upon those responsibilities and our extensive experience with economic development throughout Franklin County, the FCADC strongly opposes the

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proposed project and respectfully requests that the Commission deny Transource's applications and petition.

At a minimum, the Commission should first fully consider and finally decide Transource's application for a Certificate of Public Convenience at Docket No. A-2026-3062675 before allowing the siting application or zoning-exemption petition to proceed. Transource should not be permitted to litigate the location of a transmission corridor or seek an exemption from local zoning requirements before establishing that it is legally qualified, operationally fit and serving a demonstrable public need in Franklin County.

The FCADC also opposes the consolidation of these proceedings if consolidation would prevent a complete, orderly and independent consideration of the threshold issues presented by the Certificate of Public Convenience application. The residents, businesses, municipalities and property owners affected by this project are entitled to meaningful due process—not an expedited process that presumes the project's necessity before that necessity has been established.

Our substantive concerns include the following:

Lack of demonstrated local public benefit. The proposed project would impose substantial and permanent consequences upon Franklin County, yet Transource has not demonstrated that the County's residents, employers or communities would receive benefits proportionate to those burdens. Franklin County should not be treated merely as a corridor through which regional transmission infrastructure may be constructed for the benefit of distant energy markets.

Damage to agriculture and preserved farmland. Agriculture is one of Franklin County's largest and most important economic sectors. The proposed transmission corridor would affect productive farms, agricultural soils and rural landscapes, including areas in which substantial public and private investments have been made to preserve farmland. Fragmenting these properties with towers, easements and access routes would create lasting operational and economic consequences for farmers and landowners.

Adverse impact upon economic development and property values. The FCADC is concerned that the proposed line would diminish the marketability and development potential of affected properties, interfere with existing businesses and discourage future private investment. High-voltage transmission infrastructure can restrict the use of industrial, commercial, residential and

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agricultural property and can create uncertainty that negatively affects property values and investment decisions.

Impact upon existing Franklin County businesses. The proposed corridor has the potential to affect important employers and properties that contribute significantly to the County's tax base, employment and economic vitality. The Commission should not authorize a project that creates avoidable operational risks or limits the expansion potential of established businesses without clear and compelling evidence that no reasonable alternative exists.

Failure to adequately utilize existing infrastructure. Before authorizing an entirely new 29-mile transmission corridor, Transource should be required to demonstrate that existing transmission corridors, utility rights-of-way and other infrastructure cannot be upgraded, expanded or more efficiently utilized. Franklin County already hosts significant transportation, utility and defense-related infrastructure. The cumulative burden imposed upon the County must be part of the Commission's analysis.

Geological, environmental and construction concerns. Franklin County contains karst geology, productive agricultural soils, streams, wetlands and other sensitive environmental resources. The construction of large transmission structures and a major substation raises legitimate concerns involving subsurface stability, stormwater, groundwater, soil compaction, erosion, environmental disturbance and long-term maintenance access.

Loss of local land-use authority. The FCADC objects to Transource's request at Docket No. P-2026-3062687 to exempt its proposed Greene Township facilities from local zoning regulation. Local zoning is an essential means through which municipalities protect residents, coordinate infrastructure, guide development and address community impacts. The Commission should not override Greene Township's lawful land-use authority unless Transource first establishes its legal status as a public utility in Franklin County and proves that the requested exemption is necessary for the public welfare.

Escalating project costs and questionable economic justification. The Commission should carefully evaluate the project's current cost, the assumptions underlying its claimed congestion savings and the extent to which Pennsylvania ratepayers may ultimately bear financial responsibility. A project originally evaluated many years ago should not be approved based upon outdated assumptions, studies or economic conditions.

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The FCADC supports infrastructure projects that are necessary, responsibly located and demonstrably beneficial to the communities they affect. This project does not meet that standard. Its local costs are substantial and permanent, while its claimed benefits to Franklin County remain speculative and insufficiently demonstrated.

Accordingly, the Franklin County Area Development Corporation respectfully requests that the Pennsylvania Public Utility Commission:

1. Deny Transource Pennsylvania, LLC's application for a Certificate of Public Convenience at Docket No. A-2026-3062675;
2. Deny the siting and construction application at Docket No. A-2026-3062686 or, alternatively, hold that proceeding in abeyance until the Certificate of Public Convenience application has been fully and finally decided;
3. Deny the petition for exemption from Greene Township zoning regulations at Docket No. P-2026-3062687 or, alternatively, hold that proceeding in abeyance until Transource has established its legal authority to operate as a public utility in Franklin County;
4. Reject Transource's request to consolidate the proceedings to the extent consolidation would prematurely advance the siting and zoning matters or diminish the procedural rights of affected parties; and
5. Require Transource to establish, through current and independently supportable evidence, that the project is necessary, economically justified and superior to all reasonable alternatives, including the expansion or modernization of existing transmission corridors.

Franklin County has repeatedly demonstrated its willingness to accommodate infrastructure that provides a genuine and equitable public benefit. However, our residents, farmers, employers and municipalities should not be required to sacrifice productive property, economic opportunities and local land-use authority for a project whose necessity and local benefits have not been convincingly established.

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Thank you for your consideration of the FCADC's formal protest. Please include this correspondence in the official record for all three proceedings.

Respectfully submitted,



L. Michael Ross
President

C: FCADC Board of Directors
Representative Rob Kauffman
Representative Rich Irvin
Representative Chad Reichard
Senator Doug Mastriano