

August 4, 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 Franklin County
Docket No. A-2026-3062686
FORMAL PROTEST/REQUEST TO HOLD IN ABEYANCE

Dear Secretary Homsher:

Pennsylvania Farm Bureau (PFB) is Pennsylvania's largest general farm organization, representing approximately 26,000 members engaged in all manner of agricultural activities, including the production and processing of crops; the production and processing of animals; the production and processing of forestry products; landscaping and horticultural services; agriculture-related support services; and food manufacturing.

PFB is comprised of 54 county Farm Bureaus, which include among their members farmers, landowners, agricultural businesses, and everyday consumers committed to preserving the rural way of life. At present, members of the Franklin County Farm Bureau (FCFB) are very concerned with the rapidity with which for-profit corporations are threatening the future existence of some of the most productive farmland and richest natural resources not only in their county, but in the entire United States.

In support of our members in Franklin County, PFB writes to file a formal protest against the application of Transource Pennsylvania, LLC for approval of the siting and construction of the 230 kV transmission line known as Project 9A West in Franklin County. We request that the Commission deny this application or, alternatively, immediately hold this siting proceeding in abeyance until the antecedent CPC Application (Docket No. A-2026-3062675) is finally decided by the Commission.

Under the Commission's recent determination in the MARL Interlocutory Order (June 1, 2026), a transmission line siting application filed concurrently with a CPC application is legally premature. Because Transource does not currently hold certificate authority to operate in Franklin County, it cannot legally seek siting authority. Moving forward on this docket now forces local landowners to prematurely engage in costly litigation on the routing merits, directly violating the due process rights of those landowners.

Further informing our opposition is the fact that on an annual basis, PFB compiles information and writes policies intended to support sustainable agriculture. As part of that process, county Farm Bureaus statewide, in turn, gather and vote on these policies, which if approved become Farm Bureau policy. The list below includes a partial compilation of those policies that touch on the issues that are currently jeopardizing Franklin County's farmland and agricultural future. Specifically, we are concerned with the losses, both direct and indirect, from solar farms, data centers, new electric transmission, spiraling electric rates and the use of eminent domain to enhance corporate profitability.

- We recommend that prime soils (USDA Land Capability Classification 1-3) be prohibited for development of data centers and data mines.
- We recommend preventing the socialization of data center development costs including electrical transmission.
- We recommend that data centers be required to provide their own power source.

- We oppose state-level preemption of local and county land use authority for the siting of energy generation and storage facilities.
- We support the right of the state to deny construction of all high voltage transmission for any reason, and support all state efforts to maintain that right, including the departure of the state from the PJM Regional Transmission Organization.
- We oppose the addition of electrical transmission lines that primarily benefit neighboring states.

Economic losses due to business disruption, along with the cost borne to engage and the resources needed to house, construct, and provide ongoing maintenance to the proposed project are counterproductive both to PFB's mission and to the best interest of our farming community in Franklin County. Likewise, it is not the responsibility of Franklin County landowners to carry the burdens for these corporations.

Franklin County's farming future depends on open farmland and natural resources. If this application is ever reviewed on its merits, PFB urges the Commission to reject the proposed route based on the following severe geological, operational, and environmental impacts:

1. ***Subterranean Karst and Structural Instability:*** Transource has explicitly admitted in its 2026 filings that it was forced to completely relocate its proposed 33-acre Rice Substation due to "significant karst formations present under the property" that threaten structural integrity. This official corporate admission proves that our local limestone geology is inherently unstable. If the underground terrain is too hazardous for a substation, constructing a 24.4-mile high-voltage line across identical, sinkhole-prone karst features poses an unacceptable structural risk to the surrounding soils, local water tables, and agricultural foundations.
2. ***Interference with Precision Field Equipment:*** Modern farming utilizes large, expensive precision planting and harvesting equipment guided by delicate GPS technology. Forcing operators to turn and maneuver this machinery around massive towers is time-consuming, patterns inefficient fieldwork, and imposes permanent annual production costs.
3. ***Environmental Public Trust (Article I, Section 27):*** The environmental impacts of Transource's proposed line warrant thorough review and implicate the Commission's fiduciary duties under the Environmental Rights Amendment of the Pennsylvania Constitution.
4. ***Acoustic Corona Disruption:*** Erecting massive commercial steel structures into our clear skyline and imposing the continuous corona sizzles, crackles, or hissing noises emitted by high-voltage lines during humid or foggy conditions is destructive to home-based businesses, resident well-being, and local property values.

PFB requests that the Commission honor the due process rights of our members, freeze this proceeding until the CPC track is resolved, and conduct future physical site views and local public input hearings in Franklin County.

Thank you for your attention to this matter and your consideration of our views. Please contact us if you have questions or require additional information.

Sincerely,



Tommy R. Nagle
President