Pennsylvania Farm Bureau

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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 Certificate of Public Convenience Application for Franklin County
Docket No. A-2026-3062675
FORMAL PROTEST/CONSOLIDATION OPPOSED

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.

For those reasons, PFB writes to file a formal protest against the application of Transource Pennsylvania, LLC for a Certificate of Public Convenience (CPC) to operate transmission facilities and supply transmission service in Franklin County. PFB explicitly objects to Transource's corporate motion for consolidation.

Consistent with the Commission's recent binding precedent in the MARL Interlocutory Order (Docket No. A-2026-3060856; June 1, 2026), a decision regarding the core CPC must be fully vetted and finally decided before the Commission can consider the merits of any separate transmission line siting or zoning applications. Forcing local citizens to litigate a route before a utility has even obtained permission to operate in the proposed territory violates the due process rights of those citizens.

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. As a stakeholder representing its members in Franklin County, PFB requests that the Commission deny Transource's CPC application on the following grounds, regarding corporate fitness and public necessity:

1. ***Skyrocketing and bloated project costs***: Transource's 2026 application reveals that the estimated cost for just this western segment has ballooned to a staggering $231.3 million. Shockingly, the core construction and planning element is only estimated at $112.7 million, meaning that an astonishing $170.4 million of the price tag consists of accumulated taxes, cost escalations, and financial inflation pushed out to a 2029 target date. Pennsylvania consumers should not be forced to subsidize a $231.3 million capital project whose costs are heavily inflated by a decade of failed corporate litigation.

2. ***Absolute failure to demonstrate local benefit***: No entity has shown how the multi-million-dollar cost savings claimed by Transource will ever be passed back to a typical Pennsylvania electric customer. The market efficiency savings benefit and are distributed among power marketers and financial institutions in receiving states, while local consumers bear the added rate burdens.

3. ***Gross misuse of capital***: Transource has reportedly spent over $200 million on a decade of failed litigation regarding the old Project 9A without laying a single foot of line. Funneling capital into prolonged legal challenges against state-level denials, and using funds to pay off opposition groups, shows a systemic lack of stewardship.

Transource is a for-profit corporation seeking to abuse the power of eminent domain for a market efficiency project that is not a public necessity. PFB requests that the Commission send this CPC application to the Office of Administrative Law Judge for full, in-person public input hearings so that the public can address Transource's fitness firsthand.

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 Nagle

Tommy R. Nagle
President