

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 Zoning Exemption Petition in Greene Township, Franklin County
Docket No. P-2026-3062687
FORMAL ANSWER AND 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 and answer to the Petition of Transource Pennsylvania, LLC for confirmation of an exemption from local zoning regulation in Greene Township. We request that the Commission deny this petition or, alternatively, immediately hold this matter in abeyance until Transource's core CPC Application (Docket No. A-2026-3062675) is fully and finally decided by the Commission.

Under Section 619 of the Pennsylvania Municipalities Planning Code (MPC), zoning exemptions are strictly limited to verified public utilities. Because Transource's provisional certificate to operate in Franklin County was previously rescinded, it does not currently qualify as a public utility in that territory. Under the Commission's clear direction in the MARL Interlocutory Order (June 1, 2026), reaching the merits of a zoning exemption before a utility is formally certificated represents a procedural mismatch that violates public due process.

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. Should this petition ever be reviewed on its merits, PFB strongly objects on the following grounds:

1. **Subversion of local democratic control:** Transource is actively attempting to strip away local municipal zoning authority over building, staging, and construction configurations for a massive 33-acre substation facility. This represents an unacceptable corporate overreach that tramples on Greene Township's historic municipal ordinances and municipal planning rights.
2. **Mandatory public hearing requirement:** Under Section 619 of the MPC, the public hearing requirement regarding the specific situation of the building in question is mandatory. Greene Township and its local residents have an absolute right to appear, present expert witnesses, and cross-examine Transource on the witness stand regarding the safety, noise, and visual necessity of the Rice Substation control module.

PFB respectfully requests that the administrative law judges enforce the law, put this petition on hold until the CPC docket is decided, and subsequently schedule the mandatory local public hearings to preserve Greene Township's planning rights.

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