

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Transource Pennsylvania, LLC filed
Pursuant to 52 Pa. Code Chapter 57, Subchapter G,
for Approval of the Siting and Construction of the
230 kV Transmission Line Known as Project 9A West
in a Portion of Franklin County, Pennsylvania
Docket No. A-2026-3062686

PETITION TO INTERVENE OF **Lemma & O'Connor Investors LLC**, 1181 Falling Spring Road,
Chambersburg PA 17202.

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to 52 Pa. Code §§ 5.71-5.76, **Lemma & O'Connor Investors LLC**, (hereinafter
“Petitioner”) hereby files this formal Petition to Intervene, pro se, in the above-captioned
proceeding, and in support thereof respectfully represents:

1. The Petitioner is a multimember LLC. owning real estate located at **0 Grand Point Road,
Chambersburg PA 17202** The affected property is officially designated as Tax Parcel ID /
UPI: **09-0C18.-63.-000000**

2. Service of all papers, dockets, and communications in this proceeding should be
directed to the Petitioner at the address listed above, or via email at
brandon@brandalellc.com.

3. The Petitioner’s interest in this proceeding is direct, substantial, and immediate. The
proposed high-voltage 230 kV transmission line corridor, as planned by Transource
Pennsylvania, LLC under Docket No. A-2026-3062686, threatens to **encumber** the
Petitioner’s real property.

4. The Petitioner formally requests that this Siting proceeding be held in abeyance until the
antecedent CPC Application (Docket No. A-2026-3062675) is finally decided. Under the
Commission’s MARL Interlocutory Order (June 1, 2026), a siting application filed
concurrently with a CPC application is premature. Moving forward now forces local
landowners to prematurely engage in costly litigation on the routing merits, directly
violating our due process rights.

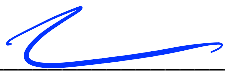
5. If this docket is litigated on the merits, the permanent presence of the proposed
structures within the right-of-way will inflict unique, irreparable harm on the Petitioner’s
property, including subsurface soil compaction, interference with precision GPS field
equipment, destruction of agricultural land, induced stray voltage risks to livestock, and
severe diminution of property value.

6. The Petitioner's unique property and operational interests are not adequately represented by any existing participant. Participation by the Petitioner is necessary to build a localized record regarding the environmental public trust (Article I, Section 27) and structural/karst viability of this specific corridor.

WHEREFORE, the Petitioner, **Lemma & O'Connor Investors LLC** pro se, respectfully requests that the honorable Pennsylvania Public Utility Commission grant this Petition to Intervene, and afford the Petitioner full active party status in this docket.

Respectfully submitted,

Date: **July, 13th 2026**

By:  _____

Lemma & O'Connor Investors LLC

Brandon Stouffer, Member

VERIFICATION

I, **Lemma & O'Connor Investors LLC**, hereby state that the facts set forth 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 13th, 2026**

By:  _____

Lemma & O'Connor Investors LLC

Brandon Stouffer, Member