

Buchanan

John F. Povilaitis
717 237 4825
john.povilaitis@bipc.com

409 North Second Street
Suite 500
Harrisburg, PA 17101-1357
T 717 237 4800
F 717 233 0852

August 13, 2026

Via E-Filing

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: 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

Dear Secretary Homsher:

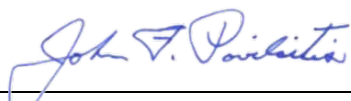
Enclosed for filing please find Transource Pennsylvania, LLC's ("Transource PA") Preliminary Objection to the Protest of Kyle McCausland ("Preliminary Objection") in the above referenced matter.

Copies of the Preliminary Objection (including a Notice to Plead) are being served according to the attached Certificate of Service.

Thank you for your attention to this matter.

Sincerely,

BUCHANAN INGERSOLL & ROONEY PC

By: 

John F. Povilaitis, Esquire

JFP/psm

Enclosures

cc: Administrative Law Judge Emily A. Farren (via email)
Administrative Law Judge Steven K. Haas (via email)
Certificate of Service

**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 : Docket No. A-2026-3062686
County, Pennsylvania :

NOTICE TO PLEAD

YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.101, YOU MAY FILE AN ANSWER TO THE ENCLOSED PRELIMINARY OBJECTION WITHIN TEN (10) DAYS OF THE DATE OF SERVICE HEREOF. YOUR ANSWER TO THE PRELIMINARY OBJECTION MUST BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL FOR TRANSOURCE PENNSYLVANIA, LLC.

John F. Povilaitis (PA ID No. 28944)
Alan M. Seltzer (PA ID No. 27890)
409 N. Second Street, Suite 500
Harrisburg, PA 17101
Phone: (717) 237-4800
Fax: (717) 233-0852
Email: john.povilaitis@bipc.com
E-mail: alan.seltzer@bipc.com

Jessica A. Cano (FL ID. No. 37372)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Phone: (614)-716-2921
Fax: (614)-716-1613
E-mail: jacano@aep.com

Attorneys for Transource Pennsylvania, LLC

**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 : Docket No. A-2026-3062686
County, Pennsylvania :

**PRELIMINARY OBJECTION OF TRANSOURCE PENNSYLVANIA, LLC. TO THE
PROTEST OF KYLE MCCAUSLAND**

TO ADMINISTRATIVE LAW JUDGES EMILY A. FARREN AND STEVEN K. HAAS :

Transource Pennsylvania, LLC (“Transource PA” or the “Company”) hereby files this Preliminary Objection, pursuant to the regulations of the Pennsylvania Public Utility Commission (“Commission” or “PUC”) at 52 Pa. Code § 5.101, and respectfully requests that the Protest (“Protest”) filed by Kyle McCausland (“Protestant”) and posted on the PUC Docket of this proceeding on July 27, 2026¹ be dismissed in its entirety and with prejudice because the Protestant lacks standing to raises any issues for adjudication by the Commission in this proceeding.²

In support of this Preliminary Objection, Transource PA represents as follows:

I. BACKGROUND

1. On May 21, 2026, Transource PA filed, pursuant to the Pennsylvania Public Utility Code (“Code”), at 66 Pa.C.S. § 1101, an application requesting all necessary authority, approvals, and certificates of public convenience from the Commission necessary to authorize Transource

¹Transource PA notes that it was never served a copy of this Protest.

² While Transource PA is limiting this Preliminary Objection to Standing as noted further below, its decision not to address the substantive issues alleged in the Protest shall not be deemed to be acquiescence to the relevance or lawfulness of those issues in this proceeding. Transource PA specifically reserves its rights to address the lawfulness and/or propriety of the issues addressed in the Protest later in this proceeding.

PA to begin to furnish and supply electric transmission service as a Pennsylvania public utility within portions of Franklin County, Pennsylvania (“CPC Application”).

2. The CPC Application was filed in connection with the 9A West Project, which involves the siting and construction of the new Rice-Ringgold 230 kV Transmission Line that will extend approximately 28.8 miles to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland and the new Rice Substation to be located in Franklin County, Pennsylvania. Approximately 24.4 miles of the 9A West Project will be located in Pennsylvania and approximately 4.4 miles will be located in Maryland.

3. The 9A West Project was borne out of PJM Interconnection LLC’s³ (“PJM”) planning process known as the Regional Transmission Expansion Plan and Market Efficiency Analysis, which previously selected and identified the original transmission project known as “Project 9A.”

4. On July 30, 2025, the PJM Board of Managers found that the 9A West Project is still needed to establish market efficiency and reduce regional congestion costs and supports the prompt construction of needed infrastructure in the region.

5. Contemporaneously with the CPC Application, Transource PA filed, in accordance with 52 Pa. Code § 57.72, an application requesting Commission approval of the siting and construction of a proposed new electric substation and double-circuit Rice-Ringgold 230 kilovolt (“kV”) electric transmission line and related facilities in a portion of Franklin County,

³PJM is a regional transmission organization that coordinates the movement of wholesale electricity in all or parts of 13 states and the District of Columbia. <https://www.pjm.com/about-pjm>

Pennsylvania which, as noted above is referred to as the 9A West Project (the “Siting Application”).

6. As noted above and in the Siting Application, the 9A West Project is needed to, among other things, enhance market efficiency and relieve regional congestion and related costs within the PJM area.

7. Contemporaneously with the CPC Application and the Siting Application, Transource PA filed, in accordance with 52 Pa. Code § Section 5.41 and Article VI of the Pennsylvania Municipalities Planning Code (as reenacted and amended December 21, 1988, P.L. 1329, 53 P.S. §§ 10601-10619.1) (“MPC”), a Petition for Confirmation of an Exemption from Local Zoning Regulation and for the Construction of Buildings in connection with the construction of a proposed electric substation in Greene Township, Franklin County, Pennsylvania (“Zoning Petition”).

8. Contemporaneously with the CPC Application, Siting Application and Zoning Petition, Transource PA filed with the PUC a Motion to Consolidate Proceedings and For Timely Disposition (“Consolidation Motion”).

9. The PUC issued a Telephonic Prehearing Conference Notice on June 3, 2026 advising of a Telephonic Prehearing Conference for Wednesday, August 19, 2026 at 10:00 AM in connection with the CPC Application, Siting Application and the Zoning Petition. As discussed further below, the Prehearing Conference was rescheduled to October 29, 2026.

10. Notice of the CPC Application, Siting Application and the Zoning Petition proceeding was published in the June 13, 2026 issue of the *Pennsylvania Bulletin*. That Notice

also indicated that formal protests and petitions to intervene in accordance with 52 Pa. Code (relating to public utilities) should be filed on or before August 12, 2026.

11. On June 25, 2026, Office of Consumer Advocate (“OCA”) filed (i) an Answer Opposing the Consolidation Motion, (ii) a Protest to the CPC Application, (iii) a Protest to the Siting Application, and (iv) an Answer to the Zoning Exemption Petition.

12. On June 26, 2026, the OCA filed (i) an Amended Protest to the CPC Application, and (ii) a letter requesting that the OCA’s original Protest be to the CPC Application be removed from the on-line PUC docket.

13. On June 29, 2026, a Notice of Appearance on behalf of the Coalition to Protect Franklin County was filed in the CPC Application docket by Benjamin C. Dunlap, Jr., Esquire at Cohen Seglias Pallas Greenhall & Furman PC.

14. On July 2, 2026, Transource PA filed a letter at the CPC Application docket indicating that while it was not filing an Answer to the OCA’s Protest, such failure to file an Answer should not be construed as concurrence in the grounds alleged in the OCA Protest.

15. On July 2, 2026, Transource PA also filed a letter with the PUC in connection with the CPC Application, Siting Application and Zoning Petition Dockets indicating its intention to file and serve a timely Reply to the OCA’s Answer to the Consolidation Motion. That letter also requested that the PUC publish notice of the Consolidation Motion in newspapers of general circulation. Transource PA filed a Reply to the New Matter in the OCA’s Answer to the Consolidation Motion on July 15, 2026.

16. On July 2, 2026, Transource PA filed a letter with the PUC enclosing Affidavits of Publication of the Notice required by the PUC to be published in general circulation newspapers.

17. On August 3, 2026, the ALJs issued Interim Order #1 which, among other things, (i) directed Transource PA to republish notification of the filing of the CPC Application and the newly established Prehearing Conference of October 29, 2026; (ii) extended the deadline for filing Protests and Petitions to intervene in this proceeding to October 15, 2026; (iii) directed Transource PA to update its service list for the proceeding; (iv) struck from the record a letter filed by Transource PA on July 2, 2026 in the proceedings for the CPC Application, Siting Application and Zoning Petition; (v) struck from the record Transource PA's Reply to the New Matter of the Office of Consumer Advocate filed on July 15, 2026 in proceedings for the CPC Application, Siting Application and Zoning Petition; and (vi) noted that the Motion for Consolidation will be ruled upon by separate order following the October 29, 2026 Prehearing Conference.

18. Attachment 1 contains the protests and petitions to intervene that have been filed to date in connection with the Siting Application.

19. Transource PA was not served with the Protest. Transource PA learned of the Protest from a review of pleadings posted on the Commission's docket. In an abundance of caution and to ensure a timely response, this Preliminary Objection is being filed within 20 days of the date included on the posted Protest.

II. STANDARD OF REVIEW

20. The Commission's Rules of Administrative Practice and Procedure permit the filing of preliminary objections. 52 Pa. Code § 5.101; *see also Equitable Small Transportation Intervenors v. Equitable Gas Company*, Docket No. C-00935435 (Final Order entered July 18, 1994).

21. Pursuant to the Commission's regulations, preliminary objections in response to a pleading may be filed on several grounds, including:

- (1) Lack of Commission jurisdiction or improper service of the pleading initiating the proceeding.
- (2) Failure of a pleading to conform to this chapter or the inclusion of scandalous or impertinent matter.
- (3) Insufficient specificity of a pleading.
- (4) Legal insufficiency of a pleading.
- (5) Lack of capacity to sue, nonjoinder of a necessary party or misjoinder of a cause of action.
- (6) Pendency of a prior proceeding or agreement for alternative dispute resolution.
- (7) Standing of a party to participate in the proceeding.

52 Pa. Code § 5.101(a) (emphasis added).

22. The Commission's procedure regarding the disposition of preliminary objections is similar to that utilized in Pennsylvania civil practice. *Equitable Small Transportation Interveners*, Docket No. C-00935435 (July 18, 1994).

23. A preliminary objection in civil practice seeking dismissal of a pleading will be granted only where relief is clearly warranted and free from doubt. *Interstate Traveller Services, Inc. v. Pa. Dept. of Environmental Resources*, 406 A.2d 1020 (Pa. 1979); *Rivera v. Philadelphia Theological Seminary of St. Charles Borromeo, Inc.*, 595 A.2d 172 (Pa. Super. 1991). The Commission has adopted this standard. *Montague v. Philadelphia Electric Company*, 66 Pa. PUC 24 (1988).

24. The Commission may dismiss a pleading without hearing if, in its opinion, a hearing is not necessary in the public interest. 52 Pa. Code § 5.21(d); *see also Lydine Dutton v. Cordia Communications Corporation*, Docket No. F-2010-2201413 (Initial Decision entered March 10, 2011; Order entered September 22, 2011) (citing 66 Pa.C.S. § 703(b)).

25. In ruling on preliminary objections, the Presiding Officer must accept as true all well-pled allegations of material facts as well as all inferences reasonably deducible therefrom. *Stilp v. Cmwlth.*, 910 A.2d 775, 781 (Pa. Cmwlth. 2006) (citing *Dep't of Gen. Servs. v. Bd. Of Claims*, 881 A.2d 14 (Pa. Cmwlth. 2005)). However, the Presiding Officer need not accept as true conclusions of law, unwarranted inferences from facts, argumentative allegations, or expressions of opinion. *Stanton-Negley Drug Co. v. Dep't of Pub. Welfare*, 927 A.2d 671, 673 (Pa. Cmwlth. 2007). Notwithstanding, any doubt must be resolved in favor of the non-moving party. *Stilp*, at 781.

26. In addition, the Presiding Officer must determine whether, based on the factual pleadings, recovery is possible. *See Rok v. Flaherty*, 527 A.2d 211, 214 (Pa. Cmwlth. 1987). Indeed, for preliminary objections to be sustained, it must appear with certainty that the law will permit no recovery. *See Stilp*, at 781; *Milliner v. Enck*, 709 A.2d 417, 418 (Pa. Super. 1998).

III. **PRELIMINARY OBJECTION**

A. Preliminary Objection – Protestant Lacks Standing

27. Transource PA incorporates Paragraphs 1-26 above as if fully set forth herein.

28. The Protest should be dismissed because the Protestant's property is not traversed by the Proposed Route of the 9A West Project or an identified alternative route. The Protestant's only interest is highly attenuated and non-substantial in that it has not surpassed the general

interest of all citizens, and because the general interests of ratepayers and consumers within the affected counties are adequately represented by the OCA, which has filed an Amended Protest and will be participating in this proceeding for this very reason. Therefore, the Protestant lacks standing to file a Protest in this proceeding.

29. Under Pennsylvania law, “[i]n seeking judicial resolution of a controversy, a party must establish as a threshold matter that he has standing to maintain the action.” *Stilp v. Commonwealth*, 940 A.2d 1227, 1233 (Pa. 2007). “[T]he core concept of standing is that a person who is not adversely affected in any way by the matter he seeks to challenge is not aggrieved thereby and has no standing to obtain a judicial resolution of his challenge.” *Fumo v. City of Phila.*, 972 A.2d 487, 496 (Pa. 2009) (citing *Wm. Penn Parking Garage, Inc. v. City of Pittsburgh*, 346 A.2d 269, 280-81 (Pa. 1975)).

30. To have standing, a party must establish that its interest is substantial, direct, and immediate. *See Del-Aware Unlimited. v. Commonwealth*, 551 A.2d 1117, 1121 (Pa. Cmwlth. 1988); *1000 Grandview Ass’n v. Mt. Washington Assocs.*, 434 A.2d 796, 797 (Pa. Super. 1981); *see also George v. Pa. PUC*, 735 A.2d 1282, 1286 (Pa. Cmwlth. Ct. 1999) (explaining that the three requirements for a party to have standing are: (1) the party must have a substantial interest in the subject matter of the litigation; (2) the interest must be direct; and (3) the interest must be immediate and not a remote consequence).

31. The Pennsylvania Commonwealth Court has identified the three requirements for standing as follows:

A 'substantial' interest is an interest in the outcome of the litigation which surpasses the common interest of all citizens in procuring obedience to the law. A 'direct' interest requires a showing that the

matter complained of caused harm to the party's interest. An 'immediate' interest involves the nature of the causal connection between the action complained of and the injury to the party challenging it and is shown where the interest the party seeks to protect is within the zone of interests sought to be protected by the statute or the constitutional guarantee in question. Both the immediacy and directness requirements primarily depend upon the causal relationship between the claimed injury and the action in question.

George v. Pa. PUC, 735 A.2d 1282, 1286 (Pa. Cmwlth. Ct. 1999) (citations omitted).

32. The Commission has sustained preliminary objections where the Protestant presents mere “unsupported speculation and a general concern regarding the community but makes no particular allegations of direct effects upon Protestant if the Application is granted.” *Application of Artesian Water Pennsylvania, Inc., for approval to begin to offer, render, furnish, or supply water service to the public in additional territory in portions of New Garden Township, Chester County, Pennsylvania*, 2015 Pa. PUC LEXIS 195*, *12 Docket No. A-2014-2451241 (April 29, 2015).

33. Based on the address contained in the Protest, Transource PA has determined that the Protestant does not appear to reside anywhere in Franklin County, Pennsylvania, which is where portions of the 9A West Project is proposed to be located, constructed and operated. As reflected in the Affidavit of Barry A. Baker, Attachment 2, Transource PA has determined that the address shown on the Protest is not located within the right-of-way (“ROW”) corridor for the Proposed Route or within the ROW corridors for any of the Alternate Routes of the 9A West Project.

34. In addition, the Protestant has provided no information about his *specific interests and of the specific harms that he would suffer*. Rather, the Protest alleges general interests and

harms that do not surpass the common interest of all citizens in procuring obedience to the law and repeats similar if not identical allegations in Protests filed by other people who appear to live and/or own property within Franklin County.

35. Accordingly, the Protest does not establish the manner in which the 9A West Project will cause the Protestant specific direct or immediate harm, as he does not appear to be a landowner of property that will be traversed by the 9A West Project and does not appear to even live in Franklin County.

36. The Protestant has not asserted any facts regarding the specific injury that result to him from the Commission's approval of the Siting Application. While the Protest contains unsupported speculative and general concerns, it includes no allegation of the direct or immediate effects the granting of the Siting Application will specifically have on the Protestant.

37. No basis has been alleged upon which standing could be conferred.

38. Therefore, the Protestant has no interest, let alone a substantial, direct, and immediate interest necessary to confer standing to bring the Protest about the Siting Application.

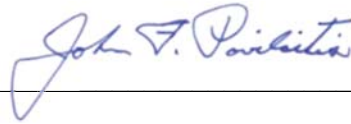
39. As noted above, the same or substantially similar form Protest has been submitted by other Protestants. The submission of these other Protests and potential participation in the above-captioned proceedings by these other Protestants has the potential to create a multitude of duplicative information within the evidentiary record.

40. It would not be within the interests of judicial economy and efficiency to allow Protestants with identical general concerns to submit discovery and testimony into the record to the extent that the information would be redundant.

IV. CONCLUSION

WHEREFORE, Transource Pennsylvania, LLC respectfully requests that the Protest filed by Kyle McCausland in the above-captioned proceeding be dismissed in its entirety pursuant 52 Pa. Code § 5.101(a)(1) and (a)(7) for, among other things, lack of standing.

Respectfully submitted,



Dated: August 13, 2026

John F. Povilaitis (PA ID No. 28944)
Alan M. Seltzer (PA ID No. 27890)
409 N. Second Street, Suite 500
Harrisburg, PA 17101
Phone: (717) 237-4800
Fax: (717) 233-0852
Email: john.povilaitis@bipc.com
E-mail: alan.seltzer@bipc.com

Jessica A. Cano (FL ID. No. 37372)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215
Phone: 614-716-2921
Fax: 614-716-1613
E-mail: jacano@aep.com

Attorneys for Transource Pennsylvania, LLC

ATTACHMENT 1

**ATTACHMENT 1 – LIST OF PROTESTANTS/PETITIONERS
SITING APPLICATION AS OF AUGUST 13, 2026**

Mandy Mitchell
Amy Appleby
Cathy Prieston
George Meckley
Jacqueline Morrison
Barbara Murdock
Debra Taylor
Fred and Doreen Rice
Jacob Rice
Jodi Mattison
Judy Sollenberger
Cindy Mason
Debra Kase
Franklin Co. Farm Bureau
Alice Nell
Rebecca Zentz
Sara Kitzmiller
Shawn High
Anthony Nofi
Dawn Buckner
Ronald Swartz
Shawn Corwell
Debra Guyer
Kelsie Rice
Lewis Kauffman
Linda Green
Daniel Hartman
Jeri Hartman
Marie Beck
Mike Cosey
Detta Wolfe
Nicholas Haines
Ralph Thompson
Jody Nace
Robert Nace
RoseAnn Thompson
Contance Funk
John Funk
Julie Nofi
Nick Nalevanko
Karen Diller
Dawn Noyes
Julie Eckels
Anne Finucane
Colby and Leah
Nitterhouse

Brittany Huntoon
Kathy Stratton
Pam Stitely
Marlene Mitchell
Steven Mitchell
Alec Yohn
Jill Kessler
Kimberly Calimer
Spencer Pheil
Allen and Lori Rice
DC Farms, LLC
David and Maria Rice
Laurie Viozzi
Andrew Newman
Betty Baker
Bill Mann
Cheryl Evans
Cheyanne Rice
Christine Elmer
Constantine Cois
Edmund Daly
Dane Anthony
Erica Martelli
Grace Hammond
Janice Schwanebeck
Jennifer Culbertson
Jennifer Graybill
Joy Holloway
Kelsey Hammond
Kathleen McKenzie
Leslie Sease
Linda Gayman
Marina Putt
Mary Noyes
Melody Shuman
Sandra Fielhauer
Maribeth Fish
Shannon Jackson
Milton Schwanebeck
Ruth Hoffeditz
Shawn Gerhart
Tanya Nitterhouse/
Sunny Hill Properties
Terence Putt
Teresa Anthony
Tracy Mann

Vicki Gibbs
Nathan Graybill
Savannah Graybill
Rodney Meyer
Franklin Co. Agricultural
Land Preservation Board
Chad Pugh
Catherine Stasko
Cheryl McAuley
Cindy Shoemaker
Clay Henninger
David Weagly
Jacqueline Morris
Janet Pollard
Jeffrey Feldman
Kendra Thompson
Kim Chilcote
Kimberly Summers
Kylie Thomas
Megan Davidson
Kristen Frank
Lauren Formosa
Melodie Anderson-Smith
Michelle Henninger
Nancy Heckman
Patricia Nitterhouse
Stephen Stasko
Suzanne Gessay
Vickie Howe
William Pananes
Franklin Co. Area
Development Corporation
Pennsylvania Farm Bureau
Sarah Gadd
Fred Nasredine
Lemma & O'Connor
Investors, LLC
Brandon Stouffer
Aaron Miller
Joel & Elizabeth Knepper
Maryanne and Dale Bohn
Laura Gettings
Josephine McDonald
Dale Rice
Alex and Jaima Leshar
Linda Pottinger

Kathryn Thompson
Kay Marlene Knode

ATTACHMENT 2

**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 : Docket No. A-2026-3062686
County, Pennsylvania :

AFFIDAVIT OF BARRY A. BAKER

Under penalty of perjury state the following facts and information under oath:

1. My name is Barry A. Baker and my business address is 625 West Ridge Pike, Suite E-100, Conshohocken, PA 19428.

2. I am employed by AECOM Technical Services Corporation (“AECOM”) as a Vice President and Eastern United States (“U.S.”) Regional Practice Lead for the Environmental Planning & Permitting Practice. I also serve as a Senior Project Manager and Technical Lead in the AECOM energy market sector.

3. In the roles described in Paragraph 2 above, I manage a practice of approximately four hundred individuals who are responsible for environmental, cultural resources, and information technology services. Additionally, I serve as a Technical Lead for electric transmission and distribution services on the east coast of the United States.

4. I have been providing consulting services to Transource Pennsylvania, LLC (“Transource PA”) in connection with a proposed high voltage electric transmission line to be constructed and operated in portions of Franklin County, Pennsylvania, which is called “Project 9A West.”

5. I am familiar with the proposed route of the transmission line to be constructed as part of Project 9A West and have reviewed the pleadings filed in this matter by Kyle McCausland.

6. I am also familiar with the geographic boundaries of Franklin County, Pennsylvania.

7. I have reviewed the address provided by Kyle McCausland in his Protest in this proceeding and, based on my knowledge of Project 9A West, the geographic boundaries of Franklin County, Pennsylvania, and utilizing the Franklin County Web Parcel Viewer available through the Franklin County GIS (Geographic Information System) Mapping Portal, <https://gisportal.franklincountypa.gov/>, I have determined that the address provided by Kyle McCausland in the Protest filed in this matter is not located within the geographic boundaries of Franklin County, Pennsylvania.

I hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).



Dated: August 13, 2026

By: _____
Barry A. Baker

**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 : Docket No. A-2026-3062686
Construction of the 230 kV Transmission Line :
known as Project 9A West in a Portion of Franklin :
County, Pennsylvania

CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served a copy of the attached document on the following persons in the manner specified in accordance with the requirements of 52 Pa. Code §1.54:

Via Email Only:

Pennsylvania Office of Small
Business Advocate
555 Walnut Street, 1st Floor Forum Place
Harrisburg, Pennsylvania 17101
Attn: NazArah Sabree
ra-sba@pa.gov

Pennsylvania Office of Consumer Advocate
555 Walnut Street 5th Floor Forum Place
Harrisburg, Pennsylvania 17101-1923
Darryl A. Lawrence, Consumer Advocate
Ryan Morden, Assistant Consumer Advocate
Melanie Joy El Atieh, Deputy Consumer
Advocate
Jacob Guthrie, Assistant Consumer
Advocate
melatieh@paoca.org
RMorden@paoca.org
jguthrie@paoca.org

Benjamin C. Dunlap, Jr., Esquire
Cohen Seglias Pallas Greenhall
& Furman PC
240 North 3rd Street, 7th Floor
Harrisburg, PA 17101
bdunlap@cohenseglias.com

Seth A. Mendelsohn, Esquire
Saxton & Stump
4250 Crums Mill Road, Suite 201
Harrisburg, PA 17112
smendelsohn@saxtonstump.com

Mandy Mitchell
818 Brookens Road
Fayetteville, PA 17222
vanillagravity@hotmail.com

Lewis Kauffman
1179 Stanley Avenue
Chambersburg, PA 17201
lewis.kauffman@comcast.net

Karen Diller
11284 Falling Spring Road
Chambersburg, PA 17202
cbonsell@nitterhouse.com

Colby and Leah Nitterhouse
2479 Newcomer Road
Chambersburg, PA 17202
leebastone@gmail.com

Anne Finucane
2760 Springview Drive
Chambersburg, PA 17202
ahf53@comcast.net

Alec Yohn
683 Raeann Drive
Greencastle, PA 17225
yohnaj@gmail.com

Jill Kessler
11415 Hearthwood Drive
Waynesboro, PA 17268
wjkess@comcast.net

Allen and Lori Rice
1430 Henry Lane
Chambersburg, PA 17202
allenr@dreamheifers.com
hs.salonandwellness@gmail.com

Rodney Meyer
5413 Manheim Road
Waynesboro, PA 17268
hotrodmeyer@gmail.com

David and Maria Rice
3572 Church Road
Chambersburg, PA 17202
ricebusinessservices@gmail.com

Guilford Township Supervisors
Attn: Don Clapper, Chairman
115 Spring Valley Road
Chambersburg, PA 17202
gtsups@guilfordtwp.us

Russell Reddig, Secretary
Stephanie Zimmerman, Director
PA Department of Agriculture
Bureau of Farm Preservation
2301 North Cameron Street
Harrisburg, PA 17110-9408
stzimmerma@pa.gov

Franklin County Agricultural Land
Preservation Board
272 North Second Street
Chambersburg, PA 17201
planning@franklincountypa.gov

Franklin County Farm Bureau
185 Franklin Farm Lane
Chambersburg, PA 17202
franklinfb@embarqmail.com

Debra Kase
3295 Springview Drive
Chambersburg, PA 17202
dsk3213@gmail.com

Ronald Swartz
2209 Cider Press Road
Chambersburg, PA 17202
rlswartz@outlook.com

Daniel Hartman
5868 Olde Scotland Road
Shippensburg, PA 17257
danielrexhartman@gmail.com

Brittany Huntoon
1444 Scotland Avenue
Chambersburg, PA 17201
huntoon.britt@gmail.com

Christine Elmer
1452 Nittany Drive
Chambersburg, PA 17202
serenitychris@gmail.com

Melody Shuman
14 Cambridge Court
Chambersburg, PA 17201
mel.shuman@comcast.net

Ruth Hoffeditz
1520 Spring Side Drive East
Chambersburg, PA 17202
quilting316@comcast.net

Via U.S. First Class Mail:

Pennsylvania Bureau of Investigation
and Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
2nd Floor, Room-N201
Harrisburg, Pennsylvania 17120
Attn: Allison Kaster

Pennsylvania Department of
Environmental Protection
P.O. Box 2063
Market Street State Office Building
Harrisburg, PA 17105-2063
Attn: Office of Field Operations

Pennsylvania Department of Transportation
Secretary
Room 1200
Transportation and Safety Building
Harrisburg, Pennsylvania 17120

Pennsylvania Historical & Museum
Commission
Chairman
300 North Street
Harrisburg, PA 17120

Franklin County Planning Department
272 North Second Street
Chambersburg, PA 17201
Contact: Quentin Clapper, Planning Director

Greene Township Supervisors
Attn: Todd E. Burns, Chairman
1145 Garver Lane
Chambersburg, PA 17202

Quincy Township Supervisors
Attn: Alan Peck, Chairman
7575 Mentzer Gap Road
Waynesboro, PA 17268

Borough of Waynesboro
Attn: Jason Stains, Borough Manager
55 East Main Street
Waynesboro, PA 17268

Washington Township Supervisors
Attn: Scott Stine, Chairman
11798 Buchanan Trail East
Waynesboro, PA 17268

West Penn Power Company
341 White Pond Drive
Akron, OH 44320

Potomac Edison Co.
341 White Pond Drive
Akron, OH 44320

Pennsylvania Electric Company (PENELC)
341 White Pond Drive
Akron, OH 44320

Rockies Express Pipeline, LLC
4200 West 115th Street
Suite 350
Leawood, KS 66211

Texas Eastern Transmission, L.P.
915 N. Eldridge Parkway, Suite 1100
Houston, TX 77079

Columbia Gas Transmission Corp.
700 Louisiana Street
Houston, TX 77002

Dominion Energy
5000 Dominion Boulevard
Glen Allen, VA 23060

Amy Appleby
9224 Newburg Road
Newburg, PA 17240

Cathy Prieston
263 Westover Way
Chambersburg, PA 17202

George Meckley
817 N. Penn Hall Drive
Chambersburg, PA 17201

Jacqueline Morrison
2204 Sollenberger Road
Chambersburg, PA 17202

Barbara Murdock
3847 Farmstead Drive
Fayetteville, PA 17222

Debra Taylor
10516 Garnes Road
Mercersburg, PA 17236

Fred and Doreen Rice
3210 Church Road
Chambersburg, PA 17202

Jacob Rice
3122 Black Gap Road
Chambersburg, PA 17202

Jodi Mattison
4680 Range Runner Drive
Fayetteville, PA 17222

Judy Sollenberger
3262 Portrait Way
Chambersburg, PA 17202

Cindy Mason
647 Wills Drive
Chambersburg, PA 17202

Alice Nell
3678 Cascade Drive
Fayetteville, PA 17222

Rebecca Zentz
6416 Bent Oak Drive
Fayetteville, PA 17222

Sara Kitzmiller
1037 Greystone Circle
Chambersburg, PA 17201

Shawn High
6857 Penny Lane
Orrstown, PA 17244

Anthony Nofi
3898 Farmstead Drive
Fayetteville, PA 17222

Dawn Buckner
3675 Cascades Drive
Fayetteville, PA 17222

Kathy Palmer
347 Wagners Lane
Newville, PA 17241

Shawn Corwell
478 Allen Drive
Chambersburg, PA 17202

Debra Guyer
38 McIlvaine Lane
Chambersburg, PA 17202

Kelsie Rice
1529 Linden Road
Chambersburg, PA 17202

Linda Green
6336 Green Briar Lane
Fayetteville, PA 17222

Jeri Hartman
5868 Olde Scotland Road
Shippensburg, PA 17257

Marie Beck
12005 Gehr Road
Waynesboro, PA 17268

Mike Cosey
2204 Sollenberger Road
Chambersburg, PA 17202

Detta Wolfe
217 W. Gay Street
Waynesboro, PA 17268

Nicholas Haines
217 W. Gay Street
Waynesboro, PA 17268

Ralph Thompson
165 Topaz Drive
Chambersburg, PA 17202

Jody Nace
6923 Saint Annes Drive
Fayetteville, PA 17222

Robert Nace
6923 Saint Annes Drive
Fayetteville, PA 17222

RoseAnn Thompson
165 Topaz Drive
Chambersburg, PA 17222

Contance Funk
260 Wilkson Lane
Fayetteville, PA 17222

John Funk
260 Wilkson Lane
Fayetteville, PA 17222

Julie Nofi
3898 Farmstead Drive
Fayetteville, PA 17222

Nick Nalevanko
389 Town Drive
Greencastle, PA 17225

Dawn Noyes
426 W. Main Street
Fayetteville, PA 17222

Julie Eckels
19732 Swailes Road
Willow Hill, PA 17271

Kathy Stratton
1301 Stanley Avenue
Chambersburg, PA 17202

Pam Stitely
3344 Anthony Highway
Chambersburg, PA 17202

Marlene Mitchell
3663 Cascades Drive
Fayetteville, PA 17222

Steven Mitchell
3663 Cascades Drive
Fayetteville, PA 17222

State Representative Rob Kauffman
166 South Main Street
Chambersburg, PA 17201

Coalition to Protect Franklin County
c/o Lori Rice, President
1430 Henry Lane
Chambersburg, PA 17202

Kimberly Calimer
3136 Church Road
Chambersburg, PA 17202

Spencer Pheil
6167 Greenbriar Terrace
Fayetteville, PA 17222

DC Farms, LLC
5730 Orphanage Road
Waynesboro, PA 17268

Laurie Viozzi
2723 Newcomer Road
Chambersburg, PA 17202

Andrew Newman
493 Sollenberger Road
Chambersburg, PA 17202

Betty Baker
237 Justine Drive
Chambersburg, PA 17201

Bill Mann
466 Bear Valley Road
Fort Loudon, PA 17224

Chad Slagenweit
1049 Bedford Street
Claysburg, PA 16625

Cheryl Evans
1061 Willowbrook Drive
Chambersburg, PA 17202

Cheyenne Rice
3122 Black Gap Road
Chambersburg, PA 17202

Constantine Cois
112 Granny Smith Lane
Fayetteville, PA 17222

Dana Hildebrand
305 Martin Lane
Wallingford, PA 19086

Donna Hildebrand
305 Martin Lane
Wallingford, PA 19086

Edmund Daly
614 E. Catherine Street
Chambersburg, PA 17201

Dane Anthony
21 Kensington Drive
Chambersburg, PA 17201

Erica Martelli
183 Harvest Lane
Chambersburg, PA 17202

Grace Hammond
17824 Amberson Road
Spring Run, PA 17262

Janice Schwanebeck
8799 Hades Church Road
Waynesboro, PA 17268

Jennifer Culbertson
7599 Nyesville Road
Chambersburg, PA 17202

Jennifer Graybill
611 Forest Road
Chambersburg, PA 17202

Joy Holloway
3895 Alfalfa Lane
Fayetteville, PA 17222

Kyle McCausland
35674 Kanawha Valley Road
Pliny, WV 25082

Kelsey Hammond
1004 S. 4th Street
Chambersburg, PA 17201

Kathleen McKenzie
134 Onxy Drive
Chambersburg, PA 17202

Leslie Sease
1061 Willowbrook Drive
Chambersburg, PA 17202

Linda Gayman
2560 Edenville Road
Chambersburg, PA 17202

Marina Putt
528 Briar Lane
Chambersburg, PA 17202

Mary Noyes
426 W. Main Street
Fayetteville, PA 17222

Sandra Fielhauer
7128 Sandwich Lane
Fayetteville, PA 17222

Maribeth Fish
333 S. Coldbrook Avenue
Chambersburg, PA 17201

Shannon Jackson
333 S. Coldbrook Avenue
Chambersburg, PA 17201

Milton Schwanebeck
8797 Hades Church Road
Waynesboro, PA 17268

Shawn Gerhart
2381 Sollenberger Road
Chambersburg, PA 17202

Tanya Nitterhouse/Sunny Hill Properties
PO Box 1013
Chambersburg, PA 17201

Terence Putt
528 Briar Lane
Chambersburg, PA 17202

Teresa Anthony
21 Kensington Drive
Chambersburg, PA 17201

Tracy Mann
466 Bear Valley Road
Fort Loudon, PA 17224

Vicki Gibbs
969 Crestwood Drive
Chambersburg, PA 17202

Karen Benedict
5413 Manheim Road
Waynesboro, PA 17268

Nathan Graybill
611 Forest Road
Chambersburg, PA 17202

Savannah Graybill
611 Forest Road
Chambersburg, PA 17202

CT Corporation System
600 North 2nd Street
Suite 401
Harrisburg, PA 17101

Chad Pugh
2607 Stone Quarry Road
Chambersburg, PA 17202

Catherine Stasko
1407 Quilters Court
Chambersburg, PA 17202

Cheryl McAuley
6788 Saint Annes Drive
Fayetteville, PA 17222

Christine Landis
960 Westminster Avenue
Hanover, PA 17331

Cindy Shoemaker
193 Mill Road
Chambersburg, PA 17201

Clay Henninger
5730 Olde Scotland Road
Shippensburg, PA 17257

David Weagly
199 President Avenue
Shippensburg, PA 17257

Jacqueline Morris
118 Walnut Street
Waynesboro, PA 17268

Janet Pollard
626 Coldsprings Road
Fayetteville, PA 17222

Jeffrey Feldman
5225 Heisey Road
Shippensburg, PA 17251

Kendra Thompson
PO Box 161
Mercersburg, PA 17236

Kim Chilcote
18303 Dry Run Road West
Spring Run, PA 17262

Kimberly Summers
5697 Bikle Road
Chambersburg, PA 17202

Kylie Thomas
213 E. Baltimore Street
Greencastle, PA 17225

Megan Davidson
50 Water Street
Walnut Bottom, PA 17266

Kristen Frank
4755 Ramler Road
Chambersburg, PA 17202

Lauren Formosa
1852 Woodduck Drive East
Chambersburg, PA 17202

Melodie Anderson-Smith
3820 Clubhouse Drive
Fayetteville, PA 17222

Michelle Henninger
5744 Olde Scotland Road
Shippensburg, PA 17257

Nancy Heckman
2363 Adin Lane
Chambersburg, PA 17202

Patricia Nitterhouse
7202 Fairway Drive South
Fayetteville, PA 17222

Stephen Stasko
1407 Quilters Court
Chambersburg, PA 17202

Suzanne Gessay
147 Echo Drive
Chambersburg, PA 17202

Vickie Howe
3535 Inverness Court
Chambersburg, PA 17202

Will Pananes
1708 Alexander Avenue
Chambersburg, PA 17201

Franklin County Area
Development Corporation
1900 Wayne Road
Chambersburg, PA 17202

Pennsylvania Farm Bureau
P.O. Box 8736
Camp Hill, PA 17001-8736

Sarah Gadd
6472 Greenbriar Circle
Chambersburg, PA 17202

Fred Nasredine
6472 Greenbriar Circle
Chambersburg, PA 17202

Lemma & O'Connor Investors LLC
1181 Falling Spring Road
Chambersburg, PA 17202

Brandon Stouffer
1181 Falling Spring Road
Chambersburg, PA 17202

Aaron Miller
3799 Church Road
Chambersburg, PA 17202

Joel and Elizabeth Knepper
3889 Church Road
Chambersburg, PA 17202

Maryanne and Dale Bohn
4140 Church Road
Chambersburg, PA 17202

Laura Gettings
4761 Range Runner Drive
Fayetteville, PA 17222

Josephine McDonald
3652 Church Road
Fayetteville, PA 17222

Dale Rice
3404 Church Road
Chambersburg, PA 17202

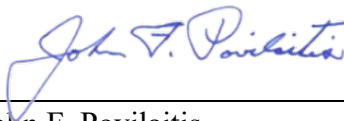
Alex and Jaima Leshner
3853 Church Road
Chambersburg, PA 17202

Linda Pottinger
6276 Merion Drive
Fayetteville, PA 17222

Kathryn Thompson
6659 Bent Oak Drive
Fayetteville, PA 17222

Kay Marlene Knode
5927 Sampache Drive
Shippensburg, PA 17257

Date: August 13, 2026



John F. Povilaitis
Buchanan Ingersoll & Rooney PC
400 North 2nd Street
Harrisburg, PA 17101
(717) 237-4825
john.povilaitis@bipc.com