

Date: 8/6/26

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:

I am writing 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. I request that the Commission deny this application, or, in the alternative, 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 our due process rights.

If this application is ever reviewed on its merits, I urge 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.

I request that the Commission honor our due process rights, freeze this proceeding until the CPC track is resolved, and eventually conduct physical site views and local public input hearings in Franklin County.

Respectfully submitted,

Signature: 

Name: Don Paley

Property/Business Address: 200 Oregon St. Mercersburg, PA 17236

UPI / Tax Parcel ID Number: _____