

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of Transource Pennsylvania, LLC 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
Docket No. P-2026-3062687

PETITION TO INTERVENE OF Joel R. Mower, PRO SE
Resident Name
TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to 52 Pa. Code §§ 5.71-5.76, Joel R. Mower (hereinafter "Petitioner")
Resident Name

hereby files this formal Petition to Intervene, pro se, in the above-captioned proceeding,
and in support thereof respectfully represents:

1. The Petitioner is an individual resident and property owner in Greene Township, residing
at and/or owning real estate located at 1068 Mower Rd, Chambersburg The affected
Resident Name

property is officially designated as Tax Parcel ID / UPI Number: 090C18029 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
1974tcbegins@gmail.com.
Resident Email Address

3. The Petitioner's interest in this proceeding is direct, substantial, and immediate. The
Petitioner resides in the immediate proximity and viewshed impacted by Transource's
proposed 33-acre Rice Substation and associated control buildings under Docket No. P-
2026-3062687.

4. The Petitioner formally requests that this Zoning Exemption proceeding be held in
abeyance until the core CPC Application (Docket No. A-2026-3062675) is finally decided.
Under Section 619 of the Municipalities Planning Code (MPC) and the Commission's MARL
Interlocutory Order (June 1, 2026), zoning exemptions are strictly limited to verified public
utilities. Because Transource does not currently hold a valid certificate to operate in
Franklin County, reaching the merits of a zoning exemption now violates public due
process.

5. If litigated, the Petitioner seeks to protect Greene Township's local zoning authority and enforce the mandatory public hearing requirements of MPC Section 619. The proposed corporate override directly threatens the local tax base, tramples on municipal planning rights, and introduces industrial visual blight and noise into a quiet, rural atmosphere adjacent to the Petitioner's home.

6. The Petitioner's unique localized interests are not adequately represented by any existing participant. Participation by the Petitioner is necessary to ensure the community has the opportunity to appear, present witnesses, and cross-examine the Applicant regarding the necessity and safety of the proposed facility layout.

WHEREFORE, the Petitioner, _____
Resident Name 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: 8-22-26

By: Joel R. Mower
Resident Signature

Joel R. Mower, Pro Se
Resident Name

VERIFICATION

I, Joel R. Mower
Resident Name 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: 8-22-26

By: Joel R. Mower
Resident Signature

Joel & Linda Mower
683 Mower Road
Chambersburg, PA 17202-8154

HARRISBURG PA 171

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Pennsylvania Public Utility Commission
Secretary's Bureau
Commonwealth Keystone Building
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