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September 16, 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 for All of the Necessary Authority, Approvals and Certificate of Public Convenience to Begin to Offer, Render, Furnish and/or Supply Transmission Service in portions of Franklin County, Pennsylvania Necessary to Operate Transmission Facilities for Project 9A West; and for any Other Approvals Necessary
Docket No. A-2026-3062675

Dear Secretary Homsher:

Enclosed for filing please find Transource Pennsylvania, LLC's ("Transource PA") Preliminary Objection to the Protest of Zane Garber ("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: 

Alan M. Seltzer, 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 for :
All of the Necessary Authority, Approvals and :
Certificate of Public Convenience to Begin to : Docket No. A-2026-3062675
Offer, Render, Furnish and/or Supply Transmission :
Service in portions of Franklin County, :
Pennsylvania Necessary to Operate Transmission :
Facilities for Project 9A West; and for any Other :
Approvals Necessary :

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.

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Attorneys for Transource Pennsylvania, LLC

**BEFORE THE
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**PRELIMINARY OBJECTION OF TRANSOURCE PENNSYLVANIA, LLC. TO THE
PROTEST OF ZANE GARBER**

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 Zane Garber (“Protestant”) and posted on the PUC Docket of this proceeding on August 28, 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

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.

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 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.

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>

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, 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. On September 3, 2026, Transource PA filed a letter with the PaPUC enclosing Affidavits of Publication of the Notice required by Interim Order #1 to be published in general circulation newspapers.

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

20. 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

21. 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 Interveners v. Equitable Gas Company*, Docket No. C-00935435 (Final Order entered July 18, 1994).

22. 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).

23. 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).

24. 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).

25. 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)).

26. 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.

27. 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

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

29. 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.

30. 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)).

31. 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).

32. 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).

33. 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).

34. 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.

35. 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.

36. 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. Allowing this Protestant to intervene where his property is so distant from the location of the Project, essentially eliminates any legal standard for evaluating standing.

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

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

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

40. 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.

41. 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 Zane Garber 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: September 16, 2026

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Attorneys for Transource Pennsylvania, LLC

ATTACHMENT 1

**ATTACHMENT 1 – LIST OF PROTESTANTS/PETITIONERS
CPC APPLICATION AS OF SEPTEMBER 16, 2026**

Mandy Mitchell	David and Maria Rice	Brenda Fitzsimmons
Lewis Kauffman	Laurie Viozzi	Bill Mawn
Karen Diller	Andrew Newman	Vicki Gibbs
Shawn Corwell	Edgar Hoffeditz, II	Betty Baker
Colby & Leah Nitterhouse	Brechyn Chace	Richard and Gale Crist
Amy Appleby	Pam Stitely	Catherine Stasko
Dawn Buckner	Nick Nalevanko	Chad Pugh
Franklin Co. Farm Bureau	Nicholas Haines	Cheryl McAuley
Dennis Sirbaugh	Marlene Mitchell	Cindy Shoemaker
Allen and Lori Rice	Mark Flohr	David Weagly
Shawn High	Kathy Stratton	Clay Henninger
Debra Kase	Julie Nofi	Denton Benedict
William Nitterhouse/ Smith Properties	Ralph Thompson	Evan Crider
Sara Kitzmiller	RoseAnn Thompson	Jacqueline Morris
Cindy Mason	Alec Yohn	Jeffrey Feldman
Jodi Mattison	Steven Mitchell	Kendra Thompson
Barbara Murdock	Rodney Meyer	Kim Chilcote
Alice Nell	Erica Martelli	Kimberly Summers
Cathy Prieston	Caitlin Ramsey	Kristine Frank
Fred and Doreen Rice	Karen Benedict	Kylie Thomas
Margaret Rettger	Jacob Graybill	Lila Benedict
Jacob Rice	Kelsey Hammond	Michelle Henninger
Anthony Nofi	Joy Holloway	Melodie Anderson-Smith
Jacqueline Morrison	Jennifer Graybill	Nancy Heckman
George Meckley	Jennifer Culbertson	Olivia Moore
Judy Sollenberger	Grace Hammond	Stephen Stasko
Rebecca Zentz	Emily Rice	Patricia Chitterhouse
Mike Cosey	Edmund Daly	Suzanne Gessay
Kelsie Rice	Dane Anthony	Will Pananes
Debra Guyer	Constantine Cois	Vickie Howe
Linda Green	Shawn Gerhart	Franklin Co. Agricultural Land Preservation Bd
Robert Nace	Savannah Graybill	Janet Pollard
Ronald Swartz	Sandra Fielhauer	Franklin Co. Area Development Corporation
Jody Nace	Melody Shuman	Pennsylvania Farm Bureau
Daniel Hartman	Mary Noyes	Brian P. Askins
Jeri Hartman	Marina Putt	Sarah M. Gadd
Brittany Huntoon	Linda Gayman	Fred Nasredine
Dawn Noyes	Leslie Sease	Lemma & O'Connor Investors LLC
Contance Funk	Janice Schwanebeck	Brianne Grove
Detta Wolfe	Christine Elmer	Elizabeth & Joel Knepper
Debra Taylor	Teresa Anthony	Maryanne and Dale Bohn
Jill Kessler	Terence Putt	Josephine McDonald
John Funk	Tanya Nitterhouse	Daniel Eigenbrode
Julie Eckels	Nathan Graybill	
DC Farms, LLC	Cheyenne Rice	
	Cheryl Evans	

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CPC APPLICATION AS OF SEPTEMBER 16, 2026**

Dale Rice
Alex and Jaima Leshner
Kay Marlene Knode
Laura Gettings
Linda Pottinger
Kathryn Thompson
Aaron Miller
Franklin Co. Visitors
Bureau, Inc.
Brian Brechbill
Alexander Geanaros
Debra McKenzie
Cole Mankin
Beth Thoresen
Allen Stine
Beth Underkoffler
Barbara Aldrich
Carla Wiley
Carrie Armstrong
Christopher Aldrich
Claire Hunter
Connie Breay
Craig Nitterhouse
Dean Guidi

Deborah Umbreit
Don Palesky
Donald Aines, Jr.
Donna Baker
Eugene Weber
Gregory Rettger
Frederick Soper
Jackie Berkstresser
Jarrett Gelsinger
James Blankenbaker
Jeffrey Myers
Jerry Thomason
Jennifer Barnhart
Jesse Reichard
Jessica Berkstresser
John Miller
Joseph Rebok
Juanita Garber
Joshua Mayhugh
Julie Blankenbaker
Karen Herman
Katie McNew
Kevin Wiley
Zane Garber

Vincent Cahill
Sherrie McCleary
Lynda Thomason
Laura Aines
Virginia Sourbier
Vanessa Soper
Teal Mankin
Taylor Nitterhouse
Tammy Brean
Tonya Reichard
Robert Jacobs, Jr.
Richard Bender
Pamela Moore
Pamela Knepper
Merrill Umbreit
Megan Bender
Megan Sourbier
Mary Tenneson
Marla Weber
Joel Mower
Linda Mower

ATTACHMENT 2

**BEFORE THE
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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 Zane Garber.

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

7. I have reviewed the address provided by Zane Garber in his Protest in this proceeding (i.e., 200 Ott Road, Shippensburg, PA 17257) 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 Zane Garber 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: September 16, 2026

By: _____
Barry A. Baker

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Approvals Necessary :

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:

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Business Advocate
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ra-sba@pa.gov

Pennsylvania Office of Consumer Advocate
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Ryan Morden, Assistant Consumer Advocate
Melanie Joy El Atieh, Deputy Consumer
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