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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: 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

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**

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 : Docket No. P-2026-3062687
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.

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Attorneys for Transource Pennsylvania, LLC

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Transource Pennsylvania, LLC for :
Confirmation of an Exemption from Local Zoning :
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Electric Substation in Greene Township, Franklin : Docket No. P-2026-3062687
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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”)¹ filed by Zane Garber (“Protestant”) and posted on the PUC Docket of this proceeding on September 1, 2026² 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.³

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 a “protest” to a petition is procedurally incorrect since protests should be filed solely in connection with “applications.” See 52 Pa. Code § 5.51(a).

²Transource PA notes that it was never served a copy of this Protest.

³ 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’s⁴ (“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, Pennsylvania which, as noted above is referred to as the 9A West Project (the “Siting Application”).

⁴PJM 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>

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 Siting Application and Zoning Petition 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 Zoning Petition.

19. 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.

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. Cmwlt.*, 910 A.2d 775, 781 (Pa. Cmwlt. 2006) (citing *Dep't of Gen. Servs. v. Bd. Of Claims*, 881 A.2d 14 (Pa. Cmwlt. 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. Cmwlt. 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. Cmwlt. 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 are 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 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 his from the Commission's approval of the Zoning Petition. While the Protest contains unsupported speculative and general concerns, it includes no allegation of the direct or immediate effects the granting of the Zoning Petition 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 Zoning Petition.

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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E-mail: jacano@aep.com

Attorneys for Transource Pennsylvania, LLC

ATTACHMENT 1

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

Mandy Mitchell
Amy Appleby
Cathy Prieston
George Meckley
Jacqueline Morrison
Barbara Murdock
Fred and Doreen Rice
Jacob Rice
Jodi Mattison
Judy Sollenberger
Cindy Mason
Debra Kase
Franklin Co. Farm Bureau
Margaret Rettger
Alice Nell
Kelly Eyer
Rebecca Zentz
Sara Kitzmiller
Shawn High
Anthony Nofi
Dawn Buckner
Ronald Swartz
Shawn Corwell
Kelsie Rice
Lewis Kauffman
Daniel Hartman
Jeri Hartman
William Nitterhouse/
Smith Properties
Mike Cosey
Debra Taylor
Detta Wolfe
Nicholas Haines
Ralph Thompson
Jody Nace
Robert Nace
RoseAnn Thompson
Contance Funk
Jill Kessler
Julie Nofi
Nick Nalevanko
Karen Diller
Dawn Noyes
Julie Eckels
Brittany Huntoon
Kathy Stratton

Leah Nitterhouse
Pam Stitely
Marlene Mitchell
Steven Mitchell
Alec Yohn
Allen and Lori Rice
DC Farms, LLC
Andrew Newman
Betty Baker
Bill Mann
Carol Gribble
Cheyanne Rice
Christine Elmer
Constantine Cois
Edmund Daly
David and Maria Rice
Emily Rice
Erica Martelli
Grace Hammond
Janice Schwanebeck
Jennifer Culbertson
Joy Holloway
Kelsey Hammond
Laurie Viozzi
Leslie Sease
Linda Gayman
Maribeth Fish
Vicki Gibbs
Tracy Mann
Terence Putt
Teresa Anthony
Shawn Gerhart
Shannon Jackson
Savannah Graybill
Sandra Fielhauer
Samuel Brand
Nathan Graybill
Milton Schwanebeck
Melody Shuman
Mary Noyes
Marina Putt
Ruth Hoffeditz
Edgar Hoffeditz, II
Karen Benedict
Rodney Meyer

Franklin Co. Agricultural
Land Preservation Bd.
Richard and Gale Crist
Franklin Co. Area
Development Corporation
Pennsylvania Farm Bureau
Greene Township
Franklin County Visitors
Bureau Inc.
Brianne Grove
Aaron Miller
Joel & Elizabeth Knepper
Kay Marlene Knode
Maryanne and Dale Bohn
Josephine McDonald
Dale Rice
Laura Gettings
Richard Pottinger
Alex and Jaima Leshar
Linda Pottinger
Kathryn Thompson
Brian Brechbill
Alexander Geanaros
Allan Stine
Barbara Aldrich
Benjamin Stonesifer
Beth Thoresen
Carla Wiley
Beth Underkoffler
Carrie Armstrong
Christopher Aldrich
Claire Hunter
Cole Mankin
Colby Nitterhouse
Craig Nitterhouse
Connie Bacy
Dean Guidi
Deborah Umbreit
Don Palesky
Debra McKenzie
Donald Aines, Jr.
Donna Baker
Eugene Weber
Frederick Soper, Jr.
Jeffrey Myers
Gregory Rettger

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

Jackie Berkstresser
James Blankenbaker
Jarrett Gelsinger
Jennifer Barnhart
Jesse Reichard
Jessica Berkstresser
John Miller
Joseph Rebok
Joshua Mayhugh
Juanita Garber
Julie Blankenbaker
Katie McNew
Jerry Thomason
Kevin Wiley
Laura Aines
Laura Sourbier
Lynda Thomason
Marla Weber
Mary Tenneson
Megan Bender
Megan Sourbier
Merrill Umbreit
Pamela Knepper
Pamela Moore
Richard Bender
Tammy Breon
Sherrie McCleary
Taylor Nitterhouse
Teal Mankin
Tonya Reichard
Vanessa Soper
Vincent Cahill
Zane Garber
Robert Jacobs, Jr.
Will Pananes
Virginia Sourbier
Joel Mower
Linda Mower

ATTACHMENT 2

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Transource Pennsylvania, LLC for :
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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

**BEFORE THE
PENNSYLVANIA PUBLIC UTILTY COMMISSION**

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Electric Substation in Greene Township, 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
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Russell Reddig, Secretary
Stephanie Zimmerman, Director
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Guilford Township Supervisors
Attn: Don Clapper, Chairman
115 Spring Valley Road
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planning@franklincountypa.gov

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

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Leawood, KS 66211

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

Dominion Energy
5000 Dominion Boulevard
Glen Allen, VA 23060

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Franklin County Visitors Bureau Inc.
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Date: September 16, 2026



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