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

May 21, 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-

Dear Secretary Homsher:

Enclosed for filing with the Pennsylvania Public Utility Commission ("PaPUC") on behalf of Transource Pennsylvania, LLC ("Transource PA"), are the following documents:

1. Application for Approval of the Siting and Construction of the 230 kV Transmission Line known as Project 9A West ("Siting Application");

2. Attachments 1 through 15 in support of the Siting Application, including a Notice of Filing, which are being uploaded in the PUC's Shared Folder; and

3. Direct Testimony in support of the Application, which is being uploaded in the PUC's Shared Folder.

The filing fee of $350.00 for this Application was paid at the time of filing.

The enclosed Siting Application, a separate Application for a Certificate of Public Convenience and a Petition for Exemption from Zoning ("Zoning Petition") are being filed today with the PaPUC by Transource PA. These filings relate to the same electric transmission line project. Accordingly, Transource PA is also filing today a Motion for Consolidation and Timely Disposition of the enclosed Siting Application, the related Application for the Certificate of Public Convenience and the Zoning Petition.

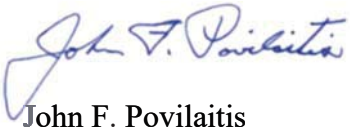
Copies of the Siting Application and accompanying Attachments and Direct Testimony are being served by certified mail, return receipt requested upon the persons indicated on the Certificate of Service.

Copies of the Notice of Filing are being served by certified mail, return receipt requested upon the persons indicated on the Certificate of Service.

Upon Commission approval, construction is scheduled to begin as soon as practicable to meet an in-service date for Project 9A West of January 19, 2029.

If there are any questions concerning this matter, please contact me at the address or telephone number provided.

Very truly yours,



John F. Povilaitis
Counsel for Transource Pennsylvania, LLC

JFP/psm
Enclosures
cc: Darren Gill, Bureau of Technical Utility Services (via email)
Deb Becker, Bureau of Technical Utility Services (via email)
Jordan VanOrder, Bureau of Technical Utility Services (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 County, Pennsylvania	:	Docket No. A-2026-_____

SITING APPLICATION OF TRANSOURCE PENNSYLVANIA, LLC

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Transource Pennsylvania, LLC ("Transource PA" or the "Company") hereby files,[1] pursuant to 52 Pa. Code § 57.72, this Siting Application requesting Pennsylvania Public Utility Commission ("Commission" or "PUC") 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 ("9A West Project"). As explained below, the proposed Rice-Ringgold 230 kV Transmission Line and substation have been approved by PJM Interconnection, L.L.C.[2] ("PJM") to alleviate transmission congestion constraints in Pennsylvania, Maryland, West Virginia, and Virginia.

I. INTRODUCTION

1. This Application is being filed with the Commission simultaneously with Transource PA's Application for a Certificate of Public Convenience ("CPC") under Chapter 11 of the Public Utility Code, 66 Pa. C.S. §101 *et seq.* ("Code") to commence service as an electric transmission-only public utility in Franklin County, Pennsylvania Commonwealth ("CPC

[1]See paragraphs 5-9 below regarding related PUC proceedings to this Siting Application.
[2]PJM Interconnection L.L.C. ("PJM") 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

Application") and 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 Franklin County, Pennsylvania ("Zoning Petition"). As explained below, as a result of PJM's approval of the 9A West Project and the signing of a binding agreement, Transource PA is obligated to construct it timely. Through this Siting Application, Transource PA seeks Commission approval of the siting and construction of the 230 kV electric transmission line extending from the new Rice Substation to the Pennsylvania-Maryland border, in a portion of Franklin County, Pennsylvania. As explained below, Transource PA undertook a detailed analysis of feasible alternatives for the 9A West Project. The Proposed Route selected for the 9A West Project will be sited to extend approximately 24.4 miles between the Maryland border and the new Rice Substation to be located in Franklin County, Pennsylvania. Subject to the Commission's approval, construction of the 9A West Project is scheduled to begin as soon as practicable following Commission approval to meet an in-service date of January 19, 2029. In support of this Siting Application, Transource PA states as follows:

II. BACKGROUND AND OVERVIEW

2. This Application is filed by Transource PA. Transource PA's address is as follows:

Transource Pennsylvania, LLC
1 Riverside Plaza
Columbus, Ohio 43215-2372
Attention: Crystal L. Wood-Hython Project MGR Staff Sr.

Transource PA's attorneys are:

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

Transource PA's attorneys are authorized to receive all notices and communications regarding this Application.

3. Transource PA is a limited liability company organized and existing under the laws of Delaware. Transource PA is a wholly-owned direct subsidiary of Transource Energy, LLC ("Transource Energy"), a partnership between two investor-owned utilities, American Electric Power Company, Inc. ("AEP") and Evergy, Inc., formed to develop and invest in competitive electric transmission projects across the United States.

4. Transource PA was formed to construct, own, operate, and maintain electric transmission facilities and equipment within the Commonwealth of Pennsylvania.

5. Transource PA is an existing regulated transmission-only public utility in Pennsylvania having been issued a Certificate of Public Convenience ("CPC") by the PUC on December 19, 2024 in the matter *Authorizing approval to Transource Pennsylvania, LLC to begin to offer, render, furnish, or supply electric transmission service to the public in Peach Bottom Township, York County, Pennsylvania,* PUC Docket No. A-2024-3049272.

6. The PUC provisionally granted Transource PA a CPC in an order entered on January 23, 2018 at Commission Docket Nos. A-2017-2587821 and G-2017-2587822 in connection with the 9A West Project, together with the separately docketed 9A East Project, collectively called "Project 9A." Together, the Pennsylvania portions of Project 9A were known

as the Independence Energy Connection ("IEC") Project. However, the CPC was rescinded when the PUC denied Transource PA's separate applications for the siting of the proposed IEC Project in an order entered May 24, 2021, at PUC Docket Nos. A-2017-2640195 (the 9A East Project) and A-2017-2640200 (the 9A West Project) (collectively, the "IEC Proceeding").

7. In an order dated December 6, 2023, at Docket No. 1:21-CV-01101 in *Transource Pennsylvania, LLC v. Steven M. DeFrank, et al,*, the United States Federal District Court for the Middle District of Pennsylvania overturned the Commission's disapproval of the siting of the IEC Project transmission lines. That denial was subsequently appealed by the Commission to the U.S. Court of Appeals for the Third Circuit ("Third Circuit") which, in a decision filed on September 5, 2025 at Docket No. 24-1045, reaffirmed the District Court order and held the PUC's action disregarding the findings of PJM with respect to the need for the IEC Project violated the Supremacy Clause of the U.S. Constitution. *Transource Pa., LLC v. DeFrank, 156 F.4th 351, 379 (3rd Cir. 2025), affirming Transource Pa., LLC v. DeFrank, 705 F. Supp. 3d 266 (M.D. Pa. 2023) ("Transource").* The PUC has determined not to further challenge the Third Circuit's decision. Requests for intervention by the Pennsylvania Office of Consumer Advocate, the intervention and appearance as counsel by the Attorney General of the Commonwealth of Pennsylvania and a request for rehearing *en banc* were filed with the Third Circuit. By Order dated November 6, 2025, the Pennsylvania Attorney General's Motion to withdraw as counsel and intervene in the appeal for purposes of reargument before the Third Circuit, *en banc*, was denied by a three-judge panel of the Third Circuit. The Attorney General is currently seeking a grant of *certiorari* on these issues before the U.S. Supreme Court.

8. After the Commission's denial of the authorizations requested by Transource PA in the IEC Proceeding, transmission projects approved by PJM in 2022 utilizing existing rights of

way and the Chanceford 500 kV substation eliminated the need for the Transource PA Furnace Run 500 kV substation, rendering the 9A East Project no longer necessary.

9. After the Commission's rejection of the IEC Project in 2021, PJM placed the IEC Project into a suspended status. In 2025, PJM completed a restudy of the IEC Project, determined that the 9A West portion of the IEC Project was still needed, and that the cost/benefit ratio of the 9A West Project had increased.

10. Consistent with PJM removing the 9A West Project from suspension, and upon receipt of all necessary approvals requested in this Siting Application and the CPC Application, Transource PA will site, construct, own, operate and maintain the 9A West Project subject to this Commission's jurisdiction and lawful authority. Transource PA is not relying on the prior record created for the requested approval of Project 9A in the IEC Proceeding. Accordingly, in this Application, Transource PA is submitting all relevant, current information in support of Project 9A West, along with background information where helpful.

11. The 9A West Project 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. Transource PA herein seeks Commission approval of the siting and construction of the 9A West Project in Franklin County, Pennsylvania.[3]

[3] As explained below, the Maryland portion of the 9A West Project will be constructed and owned by Transource PA's Maryland affiliate.

12. Accompanying this Siting Application are the following Attachments that provide additional detailed information regarding the proposed 9A West Project:

- Attachment 1 Commission Regulation Cross-Reference Matrix
- Attachment 2 Necessity Statement
- Attachment 2.1 Map and Electrical Schematic
- Attachment 2.2 Electrical Schematic
- Attachment 3 Designated Entity Agreement ("DEA")
- Attachment 4 Siting Study
- Attachment 5 Engineering Description and Safety Practices
- Attachment 5.1 Structures
- Attachment 6 List of Owners of Property within the Right-of-Way
- Attachment 7 Agency Requirements
- Attachment 8 List of Governmental Agencies, Municipalities, and Other Public Entities Receiving the Application
- Attachment 9 List of Governmental Agencies, Municipalities, and Other Public Entities Contacted
- Attachment 10 List of Public Locations where the Siting Application can be Viewed by the Public
- Attachment 11 Electric and Magnetic Fields Policy and Practices of Transource Pennsylvania and Transource Maryland
- Attachment 12 Vegetation Management
- Attachment 13 Agency Coordination
- Attachment 14 Public Notice Requirements
- Attachment 15 Notice of Filing

13. Also accompanying this Siting Application are the following written direct testimonies further explaining and supporting this Application for approval to site and construct the 230 kV line associated with the 9A West Project and the contemporaneously filed CPC Application:

> Transource PA St. No. 1: Evan K. Dean, Managing Director Joint Ventures Governance and Operations for AEPSC – Provides an overview of the 9A West Project; provides a description of Transource PA and other related entities; describes the process employed by Transource PA in developing, preparing and filing this Siting Application; explains the decision making process within Transource PA for selecting the transmission line route; explains how Transource PA will oversee the construction, operations and maintenance of the 9A West Project; provides a status on the right-of-way acquisitions and support for the granting of the CPC Application.
>
> Transource PA St. No. 2: Eric S. Williams, Planning Engineer for AEP – Explains the need for the 9A West Project; describes the 9A West Project selected by PJM Interconnection, L.L.C. ("PJM"); and describes the obligation of Transource PA to complete the project timely, and the reliability benefits of the 9A West Project for Pennsylvania.
>
> Transource PA St. No. 3: Timothy J. Horger, Senior Director, Forward Market Operations for PJM – Explains the PJM Process; explains the need for the 9A West Project; and describes how the 9A West Project was selected by PJM to be built.
>
> Transource PA St. No. 4: Barry A. Baker, AECOM Corporation, Vice President – Environmental Planning & Permitting – Eastern U.S. – Explains the environmental assessment, siting analysis, public outreach, evaluation of the Alternative Routes, and selection of the Proposed Route for the new double-circuit 230 kV transmission line associated with the 9A West Project.
>
> Transource PA St. No. 5: Jacob Clouse – Transmission Line Engineer for Burns & McDonnell – Explains the design features of the 9A West Project; and describes the design and safety features and Electric and Magnetic Fields and Practices of Transource PA for the 9A West Project, including the new 230 kV transmission line.

> Transource PA St. No. 6: Michael Mechler – Director of Right-of-Way and Infrastructure, Western Land Services Inc. – Explains the process used by Transource PA to attempt to acquire the rights-of-way and easements necessary for the 9A West Project; and provides a summary of the status of negotiations with landowners.

14. This Siting Application, including the accompanying Attachments and Statements, which are incorporated herein by reference, contains the information required by 52 Pa. Code §§ 57.72(e), 69.1101, 69.3102 - 69.3107.

III. LEGAL STANDARDS APPLICABLE TO TRANSMISSION LINE SITING APPROVAL

15. Under Code Section 1501, 66 Pa. C. S §1501, an electric utility has a statutory obligation to provide safe, adequate, and reliable service to its customers. The Commission's regulations provide that a public utility may not construct high voltage ("HV") transmission lines, i.e., electrical lines with an operating voltage of 100 kV or higher, without prior Commission approval. 52 Pa. Code § 57.71. As explained by the Commonwealth Court, the Commission's transmission line siting regulations set forth the following:

> (1) the procedures for applying for approval of an HV line -- 52 Pa. Code § 57.72; (2) the procedures for hearings on HV line applications -- 52 Pa. Code § 57.75; and (3) what the [Commission] will consider when deciding whether to approve or deny an HV line application -- 52 Pa. Code § 57.76(a). These regulations, and 52 Pa. Code § 57.76 in particular, represent a codification of the review required by article I, section 27 of the Pennsylvania Constitution. Re Proposed Electric Regulation, 1976 Pa. PUC LEXIS 114, 49 Pa. P.U.C. 709, 712 (March 2, 1976) (stating that the "review required by article I, section 27 is being incorporated into our siting regulations").

Energy Conservation Council of Pennsylvania v. Pa. PUC, 995 A.2d 465, 477-78 (Pa. Cmwlth. 2010) ("TrailCo").

16. In order to grant an application for the construction and siting of an HV electric transmission line, the Commission must find and determine the following as to the proposed line:

(1) That there is a need for it.

(2) That it will not create an unreasonable risk of danger to the health and safety of the public.

(3) That it is in compliance with applicable statutes and regulations, providing for the protection of the natural resources of this Commonwealth.

(4) That it will have minimum adverse environmental impact, considering the electric power needs of the public, the state of the available technology and the available alternatives.

52 Pa. Code § 57.76(a).

17. The Code does not define need; however, Pennsylvania courts have recognized that there is a need for reliable regional electric service and transmission systems. *Stone v. Pa. PUC*, 162 A.2d 18, 19-221 (Pa. Super. 1960); *Dunk v. Pa. PUC*, 232 A.2d 231, 234-35 (Pa. Super. 1967).

18. In *Transource,* the Third Circuit held that, "when an RTO has selected [a multi-state transmission line project] for inclusion in a regional transmission plan as part of its federal mandate, a state regulator cannot, consistent with the Supremacy Clause, reject the project based on a lack of 'need'."[4] PJM has already determined that there is a need for the 9A West Project. Thus, the Commission is preempted from denying the siting of the 9A West Project based.[5]

19. With respect to natural resources and the environment under 52 Pa. Code § 57.76(a)(3), recent Pennsylvania Supreme Court case law has concluded that Article I, Section 27 of the Pennsylvania Constitution, i.e., the Environmental Rights Amendment,[6] placed Pennsylvania's public natural resources in trust and named the Commonwealth as its trustee, to

---

[4] *Transource* at 379.

[5]Pursuant to *England v. Louisiana State Board of Medical Examiners*, 375 U.S. 411 (1964), Transource PA reserves its right to seek adjudication of federal claims in federal court, should the Commission hold against Transource PA on questions of state law, including but not limited to (a) federal law preempting state regulators from finding there is not a need for a multi-state transmission line project that PJM has determined is needed and approved for inclusion in its regional transmission plan, (b) violation(s) of the Supremacy Clause of the United States Constitution, and/or (c) violation(s) of the Dormant Commerce Clause of the United States Constitution.

[6] PA. CONST. art. I, § 27.

conserve and maintain those resources for the benefit of all people, including future generations. In carrying out these obligations, the Commonwealth, and its agencies, may subject the individual rights of citizens to clean air, pure water, and to the preservation of natural, scenic, historic, and esthetic values to reasonable regulations.[7]

20. The Commission has determined that its existing rules and policy satisfy its obligations under the Environmental Rights Amendment.[8] The Commission further explained that:

> The Commission's regulatory scheme for high-voltage line transmission siting cases, therefore, provides for a robust, evidence based deliberative process that provides due process for all interested parties. The Commission, consistent with our role as a fiduciary responsible for the preservation of the Commonwealth's natural resources, and consistent with PEDF, acts with prudence, loyalty and impartiality when adhering to these regulations. In this manner, we fulfill our responsibility to protect the public's natural resources from depletion or degradation, while also allowing legitimate development that improves the lot of Pennsylvania's citizenry, as the Pennsylvania Supreme Court recognized in *Robinson Township v. Com. of Pa*., 623 Pa. 564, 658, 83 A.3d 901, 958 (2013).[9]

[7] *Pa. Environmental Defense Foundation v. Com. Of Pa*., 161 A.3d 911, 931 (Pa. 2017); *Application of Pennsylvania Electric Company Seeking Approval to Locate Construct, Operate and Maintain a High-Voltage Transmission Line Referred to as the Bedford North-Central City West 115 kV HV Transmission Line Project*, Docket Nos. A-2016-2565296 et al., at pp. 12-14 (Order entered March 8, 2018) ("*Penelec*").

[8] *Penelec*, at pp. 13-14 ("Our siting Regulations are in accord with the Environmental Rights Amendment by requiring that the environmental impact of the proposed transmission siting route be minimized."); see also 52 Pa. Code §§ 69.3105, 69.3106.

[9] *Penelec*, p. 14.

IV. NEED FOR THE PROJECT[10]

21. RTOs, or regional transmission organizations, supervise interstate transmission and planning of electricity. The Federal Energy Regulatory Commission ("FERC") encouraged the formation of RTOs by requiring utilities to report their progress towards developing and participating in RTOs to FERC.[11] The purpose of such RTOs is for transmission facilities owned by utilities to be placed under the control of an appropriate RTO.[12]

22. FERC regulations require that each RTO have "operational authority for all transmission facilities under its control"[13] and "exclusive authority for maintaining the short-term reliability of the grid that it operates."[14]

23. PJM is a FERC-approved RTO charged with ensuring the reliable and efficient operation of the electric transmission system under its functional control and coordinating the transmission of electricity in all or parts of thirteen states, including Pennsylvania, and the District of Columbia.

[10]Notwithstanding the Third Circuit's decision in *Transource* (*See* Paragraph 6 above) limiting the PUC's role in assessing the need for interstate transmission line projects like Project 9A West, Transource PA is providing background on the "need" for Project 9A West in Attachment 2 and in the filed testimony from PJM without prejudice to, and with the full reservation of legal rights regarding, the PUC's obligation to adjudicate these issues in connection with this Siting Application. In particular, Transource PA notes that the U.S. Third Circuit Court of Appeals recently held that, "when an RTO has selected [a multi-state transmission line project] for inclusion in a regional transmission plan as part of its federal mandate, a state regulator cannot, consistent with the Supremacy Clause, reject the project based on a lack of 'need'." *Transource Pa., LLC v. DeFrank*, 156 F.4th 351, 379 (3rd Cir. 2025), affirming *Transource Pa., LLC v. DeFrank*, 705 F. Supp. 3d 266 (M.D. Pa. 2023) ("*Transource")*. Thus, while the Commission holds authority over siting and construction of a project, it may not deny a project based on FERC's determination of need. *Id*. at 378. Thus, and as noted above, Transource PA is submitting information regarding the benefits of and need for Project 9A West without prejudice to the decision in *Transource* and with a full reservation of rights both before the Commission and in the appellate courts.

[11]*See* Order No. 2000, Regional Transmission Organizations, 65 Fed. Reg. 810, 811 (Jan. 6, 2000) (codified at 18 C.F.R. pt. 35).

[12]*Id*. at 811.

[13]18 C.F.R. § § 35.34(j)(3).

[14]Id. § 35.34(j)(4).

24. In order to ensure reliable transmission service, PJM prepares an annual Regional Transmission Expansion Plan ("RTEP").[15] The RTEP is an annual planning process that encompasses a comprehensive series of detailed analyses to ensure electric power continues to flow reliably to customers under stringent reliability planning criteria.[16]

25. In addition to the reliability analysis, PJM's RTEP includes a Market Efficiency Analysis to identify congestion on electric transmission facilities that have economic or wholesale market effects, as well as potential improvements to electric transmission economic efficiencies. The electric transmission needs identified in this analysis stem from the fact that the PJM transmission grid provides the means for generators to participate in a competitive wholesale market to supply electricity, both capacity and energy, to customers in PJM's geographic footprint no matter where in this area the electrical load is located.

26. The electric transmission infrastructure needs identified by the PJM Market Efficiency Analysis are addressed by market efficiency transmission projects, which are aimed specifically at improving electric transmission economic efficiencies and alleviating electric transmission constraints that have an economic impact on PJM's wholesale energy or capacity markets.

27. When PJM's Market Efficiency Analysis identifies a need to relieve congestion on electric transmission facilities, PJM opens a Long-Term Proposal Window to solicit the submittal of potential solutions *(i.e.,* market efficiency projects) to address those needs. PJM's solicitation

[15] PJM's RTEP process is currently set forth in Schedule 6 of PJM's Amended and Restated Operating Agreement ("Schedule 6"). Schedule 6 governs the process by which PJM's members rely on PJM to prepare an annual regional plan for the enhancement and expansion of the transmission facilities to ensure long-term, reliable electric service consistent with established reliability criteria. In addition, Schedule 6 addresses the procedures used to develop the RTEP, the review and approval process for the RTEP, the obligation of transmission owners to build transmission upgrades included in the RTEP, and the process by which interregional transmission upgrades will be developed.

[16] PJM Manual 14B outlines the RTEP process and reliability criteria used for this process. PJM Manual 14B is available at: http://www.pim.eom/~/media/docunients/manuals/ml4b.ashx,

of market efficiency project submittals through its Long-Term Proposal Window is a competitive process consistent with FERC Order No. 1000.[17] Potential solutions are evaluated using two criteria: first, the project must address the congestion identified in the Market Efficiency Analysis; and, second, the project benefits must exceed the costs by at least 25 percent. [18] In addition, the project must meet PJM's congestion criteria and not create additional unacceptable congestion elsewhere on the system.

28. Market efficiency projects that are selected through PJM's Long Term Proposal Window are presented to stakeholders and recommended to the PJM Board of Managers ("PJM Board") for approval. If approved, such market efficiency projects are included in the RTEP as Baseline Projects.

29. Pursuant to Schedule 6 of PJM's Amended and Restated Operating Agreement, after the PJM Board approves a proposed market efficiency project, the successful project proponent is obligated to complete the project once PJM and the successful entity execute a Designated Entity Agreement, which specifically designates the entity or entities having construction responsibility for the project.

30. After extensive evaluation and review with stakeholders, PJM selected Project 9Ato address the needs identified in PJM's 2014/2015 RTEP Long Term Proposal Window because it provided the highest benefit-to-cost ratio, the most total congestion savings, and the most production cost savings.[19] As part of the 2014/2015 RTEP, PJM estimated that Project 9A

[17] A summary of FERC Order No. 1000 is available at: http://www.ferc.gov/industries/electric/indus- act/trans-plan.asp.
[18] Project benefits are measured by comparing the benefits in the form of net load payments and/or production costs with and without the proposed project for a 15-year study period. The economic benefit/cost ratio threshold test is set forth in PJM Manual 14B, Attachment E, available at: http://www.pim.com/~/media/documents/manuals/ml4b.ashx.
[19]The recommendation of PJM staff to approve Project 9A is available at: http://www.pjm.com/~/media/committees-groups/committees/teac/20160811/20160811-boardwhitepaper-august-2016.ashx.

(of which the 9A West Project is a part) could lower wholesale electricity costs in congested-constrained regions.

31. On August 2, 2016, the PJM Board approved Project 9A as Baseline Upgrade Numbers b2743 and b2752, which included the 9A West Project.

32. PJM has conducted periodic annual re-evaluations of Project 9A West since the project was placed in suspension status in 2021. PJM's 2025 annual re-evaluation showed a 3.74 B/C ratio for the original configuration of Project 9A and a 3.85 B/C ratio for the western portion of the project only, i.e., the 9A West Project.

33. While other RTEP projects have been constructed since 2021 and therefore have obviated the need for what had been the eastern portion of the original Project 9A, PJM's staff recommended to PJM's Boad of Managers in May 2025 that the 9A West Project be continued given its positive benefits and favorable B/C ratio.

34. On July 30, 2025, the PJM Board of Managers approved the recommended modification of Project 9A's scope, finding that the 9A West Project is needed and supports the prompt construction of needed infrastructure in the region.

35. Although the primary benefits from the 9A West Project relate to market efficiency and the reduction of congestion costs, the new transmission facilities associated with the 9A West Project will also enhance the electrical strength and reliability of the transmission system by virtue of the new transmission facilities in the area that will be part of the interconnected transmission grid. The 9A West will provide additional and alternative paths for electricity in the event of outages on other transmission facilities. The 9A West Project will also allow the interconnection of potential future reliability and generation projects in the area.

36. Pertinent to this Application, the 9A West Project as approved by PJM involves: (i) construction of the Rice Substation and (ii) construction of the Rice-Ringgold 230 kV

Transmission Line, and associated structures, equipment, and other facilities necessary to operate the transmission lines.

37. Accordingly, in accordance with Schedule 6 of PJM's Amended and Restated Operating Agreement and as stated in the DEA between and among PJM, Transource PA, Transource Energy, LLC and Transource Maryland, LLC dated April 2, 2026, Transource PA is required to complete the 9A West Project and have it ready for service by January 19, 2029.

38. Detailed descriptions of the process used by PJM to select and approve market efficiency projects, the need for the proposed 9A West Project as identified by PJM, and the obligation of Transource PA to complete the 9A West Project are provided in Attachment 2 to the this Siting Application and in the direct testimonies of Eric S. Williams and Timothy J. Horger, Transource PA Statement Nos. 2 and 3, respectively.

V. DESCRIPTION OF THE PROPOSED PROJECT

39. The 9A West Project as approved by PJM involves: (i) construction of the Rice Substation and, and (ii) construction of the Rice-Ringgold 230 kV Transmission Line, and associated structures, equipment, and other facilities necessary to operate the transmission lines.

40. Upon receipt of all necessary approvals, the new Rice-Ringgold 230 kV Transmission Line will be sited to extend approximately 28.8 miles, connecting the existing Ringgold Substation located near Smithsburg, Washington County, Maryland, and the new Rice Substation to be located in Franklin County, Pennsylvania. This transmission line project is referred to as the 9A West Project and is the subject of this Siting Application.

41. The Pennsylvania portion of the 9AWest Project will extend approximately 24.4 miles from the new Rice Substation to the Pennsylvania-Maryland border, and the Maryland portion of the 9A West Project will extend approximately 4.4 miles from the Pennsylvania-Maryland border to the existing Ringgold Substation. Transource PA will construct, own, operate,

and maintain the Pennsylvania portion of the Rice-Ringgold 230 kV Transmission Line, and Transource MD will construct, own, operate, and maintain the Maryland portion of the line.

42. Maps of the proposed 9A West Project are provided in Attachment 2, as well as Attachment 4 to this Siting Application.

43. As described in Statement No. 5 the testimony of Jacob Clouse and Associated Attachment 5, the Pennsylvania portion of the 9A West Project will require the installation of approximately 155 structures with an average height of 130 feet. The spans between the structures will be approximately 800 feet.

44. The Pennsylvania portion of the 9A West Project will largely consist of tubular steel monopole and multi-pole structures. In certain areas, steel lattice structure may be used to better accommodate topographical, construction, or land use constraints. Depictions of typical structures to be used for the 9A West Project are provided in Attachment 4 to this Siting Application.

45. The Rice-Ringgold 230 kV Transmission Line associated with the 9A West Project will be a 230 kV double-circuit transmission line. The 230 kV double-circuit design will utilize twelve power conductors, with two conductors used for each of the six phase positions, and two overhead ground wires.

VI. SITING ANALYSIS

A. SUMMARY OF THE SITING ANALYSIS

46. In accordance with the Commission's regulations at 52 Pa. Code § 57.72(c), Transource PA conducted an extensive, multi-faceted Siting Study to determine the overall best and most suitable route for a new 230 kV transmission line to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland to the new Rice Substation to

be located in Franklin County, Pennsylvania. The Siting Study for the 9A West Project is provided in Attachment 4 to this Siting Application.

47. The Siting Study was used to develop feasible Alternative Routes, evaluate potential impacts associated with the Alternative Routes, and identify a Proposed Route to be constructed to meet the need for the 9A West Project. The Siting Study provided Transource PA with a means to assess the human/built, environmental, engineering, and constructability variables associated with the different Alternative Routes so that a Proposed Route could be determined for the IEC-West Project. The Siting Study was initially performed in 2017. In preparation for this Application, Transource PA reviewed the original Siting Study for accuracy and has updated it to reflect current conditions along the Proposed Route and Alternative Routes.

48. Many sources of information were used to develop data for the Siting Study. These sources of information are summarized in Attachment 4 to this Siting Application.

49. The Siting Team also used a series of general siting guidelines and factors to direct the development, evaluation, and ultimate selection of routes. Using these routing guidelines and factors, the Siting Team identified opportunity and constraint features within the Study Area that would minimize potential impacts to the natural and human/built environments. Details of the opportunity and constraints used to develop the Alternative Routes are included in Attachment 4 to the Siting Application.

50. The route development process is inherently iterative with modifications made throughout the siting analysis as a result of the identification of new constraints, input from agencies, landowners, and other stakeholders, periodic re-assessment of routes with respect to the sitting guidelines and factors, and adjustments to the overall route network to develop feasible Alternative Routes.

51. The Alternative Routes identified in the original Siting Study were re-examined, and re-evaluated as part of Transource PA's overall updating of 9A West's supporting information. The Siting Team undertook a quantitative and qualitative analysis of potential impacts of each Alternative Route to the human/build environment, the natural environment, and engineering considerations. The Alternative Routes were reviewed in detail and compared using a combination of information collected in the field, Geographic Information System ("GIS") data sources, public and agency input, engineering and constructability considerations, and the collective knowledge and experience of the Siting Team.

52. Using the quantitative and qualitative analysis described above, the Siting Team selected a Proposed Route that, on balance, best minimized the overall impacts of the project. The rationale for selecting the Proposed Route was derived from the accumulation of the siting decisions made throughout the process, the knowledge and experience of the Siting Team, comments from the public and regulatory agencies, and the comparative analysis of potential impacts of each Alternative Route.

53. A detailed description of the process used to select the Proposed Route for the 9A West Project, and the confirmation process used to verify the continuing appropriateness of the Proposed Route is provided in Attachment 4 to the Siting Application.

B. SELECTION OF THE PROPOSED ROUTE

54. Using the siting process described above, the Siting Team re-examined the three (3) Alternative Routes selected for the 9A West Project: Alternative Route A, Alternative Route B, and Alternative Route C.

55. These three Alternative Routes are illustrated in Figure 7 of Attachment 4. Attachment 4 Siting Study (Section 3.5.5) details those changes that have occurred to the respective Alternative Routes from the 2018 Siting Study to the 2026 Siting Study. Adjustments

were developed to account for residential or commercial developments that have taken place during this time frame; or to address specific planned development relayed to Siting team during stakeholder engagement.

56. The Siting Team undertook a qualitative and quantitative review and comparison of each Alternative Route. A detailed explanation of the qualitative and quantitative analysis and comparison of the Alternative Routes is provided in Attachment 4 to this Application.

57. As part of the original review and comparison of the Alternative Routes, Transource PA conducted a public outreach program, which included two rounds of public open houses and a project website to inform the public about the IEC-West Project and obtain information from landowners about their properties. As part of the preparation of this Application, additional public outreach was performed as described in Statement No. 4 and related Attachment 4. Feedback provided by the public was taken into consideration as the Siting Team analyzed the Alternative Routes. A summary of Transource PA's original and updated public outreach efforts is provided in Attachment 4 to this Siting Application.

58. The Alternative Routes were compared and a Proposed Route was selected based upon a detailed analysis and balance of impacts on the human/built environment, environmental impacts, and engineering and constructability considerations. Based on these evaluation processes, the Siting Team selected Alternative Route C as the Proposed Route for the proposed 9A West Project.

59. The Proposed Route extends approximately 27.9 miles (approximately 23.5 miles in Pennsylvania and approximately 4.4 miles in Maryland). A general description of the Proposed Route is provided below:

- Alternative Route C exits the Rice Substation from the southeast corner and spans 0.2 miles east over the active Norfolk Southern railroad and to the east side of I-81, where it turns to the south to parallel I-81 for 1.1 miles to SR 696. Along this stretch

the route crosses Pine Stump Road, Mountain Run (CWF), and is within 0.5 miles of the Rocktop Airport that is located to the east past SR 696.

- Alternative Route C turns sharply east to cross SR 696 perpendicularly and travels approximately 0.6 mile to the east-southeast through an agricultural field before turning sharply to the southwest.

- Travelling southwest for 0.7 mile, Alternative Route C crosses Phillaman Run (CWF) and then crosses Black Gap Road (SR 997) in a perpendicular fashion. Alternative Route C traverses for 0.6 mile around the perimeter of the Chambersburg Mall, generally following the outer edge of the parking lot on the northern and eastern sides of the mall, and then heading west to parallel with I-81 again.

- After reaching the eastern side of I-81, Alternative Route C turns sharply south and parallels the interstate for approximately 1.4 miles and at this location I-81 and the route generally travel in a western direction. Along this section, Alternative Route C traverses the edge of agricultural fields and crosses an unnamed stream (CWF) and the Conococheague Creek (CWF).

- Alternative Route C turns sharply to the southwest and travels 0.4 miles until it reaches the existing FE Letterkenny-Grand Point 138 kV transmission line. The route stays to the east of this system and parallels it south for approximately 1.6 miles toward U.S. Route 30, spanning along agricultural fields, around the Grand Point Substation, and over Walker Road. The Lost Acres Airport is located approximately 0.6 miles west of the route.

- Prior to crossing commercial building-lined U.S. Route 30, Alternative Route C first crosses over to the west side of the transmission line, which is now the FE Grand Point-Allegheny Energy 138 kV line and then spans the highway. The route turns sharply west and then south for 0.5 miles spanning across a parking lot and bypassing around a commercial building. After going around the building, the route again parallels the FE Grand Point-Allegheny Energy 138 kV line for 0.5 mile.

- Alternative Route C deviates from the transmission line corridor for 1.1 mile to bypass around homes along the line. Along this section, the route extends to the southwest and spans Falling Spring Branch (HQ-CWF) stream, crosses Falling Spring Road, and traverses through a forested area where homes are present to the east. Within the forest, the route turns south, travels across an agricultural field and spans the FE Grand Point-Allegheny Energy 138 kV line near Henry Lane.

- After crossing this road, Alternative Route C extends to the southeast for approximately 4.6 miles over agricultural fields to Yohe Road, where it intersects with the FE Fayetteville-West Waynesboro 138 kV transmission line. This section involves crossing two unnamed WWF streams, one CWF stream, several local roadways, and the FE Fayetteville-Allegheny 69 kV line.

- As Alternative Route C crosses Yohe Road, it also spans to the east side of the FE Fayetteville-West Waynesboro 138 kV transmission line and then turns sharply to the south to parallel this existing line for approximately 1.7 miles; an unnamed CWF stream is crossed in this section, as is Stamey Hill Road.

- A 0.6 mile deviation from the colocation is required in the vicinity of the Manheim Road crossing due residential development that has built up adjacent to the transmission line, and the route then parallels the existing line for 0.5 miles on the eastern side.

- At Hess Benedict Road, Alternative Route C crosses over to the west side of the FE Fayetteville-West Waynesboro 138 kV transmission line to avoid agricultural and residential structures. The route parallels the line for another 3.7 miles, traversing agricultural fields, crossing Orphanage Road, Wayne Highway (SR 316), and Buchanan Trail East (SR 16), as well as an unnamed CWF stream.

- After crossing SR 16 and spanning the FE Antrim-West Waynesboro 69 kV lines, Alternative Route C turns sharply to the west and parallels this line for approximately 0.4 miles. This stretch includes a crossing of Cold Springs Road and an unnamed CWF stream.

- Turning to the south and then east, Alternative Route C extends for 1.2 miles to Marsh Road. The route traverses an agricultural field to avoid agricultural and residential structures, and crosses an unnamed CWF stream, the FE Reid-West Waynesboro 69 kV line, and the FE Ringgold-West Waynesboro 138 kV line.

- After crossing Marsh Road and an unnamed CWF stream, Alternative Route C turns sharply south to parallel the east side of the FE Ringgold-West Waynesboro 138 kV line for 2.1 miles. Alternative Route C crosses agricultural fields, Hagerstown Road (SR 316), the FE West Waynesboro-East Waynesboro 138 kV line, and the West Branch Antietam Creek (CWF) along this stretch. The route extends away from the transmission line corridor to avoid residential structures near the southern end of this section prior to crossing Lyons Road.

- Spanning to the west side of the FE Ringgold-West Waynesboro 138 kV line, Alternative Route C turns south and crosses the Pennsylvania/Maryland state line. The route generally parallels the transmission line for approximately 2.6 miles until it intersects with Gardenhour Road. Some deviations are required along this stretch to avoid agricultural operations and structures. The route in this section crosses Rocky Forge Road, Ringgold Pike (SR 418), Poplar Grove Road, and Newcomer Road, as well as numerous crossings of various tributaries to Little Antietam Creek.

- Alternative Route C crosses Gardenhour Road paralleling the existing transmission line for 0.4 miles and traverses through an orchard.

- Alternative Route C extends out for 0.6 miles to the southwest from the transmission line to bypasses around residential structures along Rowe Road and

traverses agricultural lands before spanning over to the south side of the FE Reid-Ringgold 138 kV transmission line.

- Alternative Route C turns east for 0.7 miles and extends into the southeastern corner of the Ringgold Substation, spanning the FE Ringgold-East Hagerstown 138 kV transmission line and Smithsburg Pike (MD 64) along the alignment.

60. The Siting Team determined that the cumulative environmental, human/built, engineering, and constructability impacts associated with the Proposed Route, Alternative Route C, will be significantly less impactful than the other Alternative Routes. A detailed explanation of the selection of the Proposed Route is provided in Attachment 4 to this Application.

VII. RIGHTS-OF-WAY

61. Transource PA's standard right-of-way width for a double circuit 230 kV transmission line is 130 feet, 65 feet either side of the proposed centerline of the transmission line. The right-of-way is determined by the structure type, design tensions, span length, and conductor "blowout" (the distance the wires are moved by a crosswind).

62. The right-of-way for the 9A West Project will be approximately 130 feet but may vary in certain areas to accommodate environmental, engineering, and constructability issues, as well as ensure compliance with the National Electrical Safety Code ("NESC") clearances.

63. There are a total of 102 landowners (85 in Pennsylvania) and 129 parcels (108 in Pennsylvania) along the route selected for the proposed 9A West Project. Detailed maps showing the properties traversed by the right-of-way for the proposed 9A West Project are provided at the end of Attachment 4 to this Siting Application.

64. Landowners who previously provided Transource PA rights-of-way ("ROW") have been advised of the 9A West Project, principally via Transource PA's exercise of rights under previously negotiated options. The landowners from whom Transource PA plans to negotiate to

acquire additional ROW and easements have been provided the notices and information required by the Commission's regulations at 52 Pa. Code § 57.91 and 69.3102.

65. A description of the process Transource PA will utilize to attempt to acquire the few remaining rights-of-way and easements for the 9A West Project is provided in Transource PA Statement No. 6.

66. Given the construction schedule and in-service date for the 9A West Project, it is necessary for Transource PA to file this Siting Application as it continues right-of-way negotiations with landowners.

67. Transource PA will continue to negotiate with all affected landowners in an effort to reach a reasonable and mutually acceptable right-of-way agreement and, thereby, avoid the need to condemn rights-of-way across the properties traversed by the 9A West Project.

VIII. HEALTH AND SAFETY

68. The proposed 9A West Project will not create any unreasonable risk of danger to the public health or safety.

69. The new 230 kV transmission line associated with the 9A West Project will be designed, constructed, operated, and maintained in a manner that meets or surpasses all applicable NESC minimum standards and all applicable legal requirements.

70. In addition to meeting the NESC standards, the 9A West Project will also be designed to meet the recommendations outlined in the American Society of Civil Engineers ("ASCE") Manual 74 ("Guidelines for Electrical Transmission Line Structural Loading").

71. A description of Transource PA's safety and design practices that will be incorporated into the 9A West Project is provided in Attachment 5 to this Siting Application.

72. Attachment 11 accompanying this Application explains Transource PA's standards for Electric and Magnetic Fields Policy and Practices, which will be applied to the 9A West Project.

73. Transource PA is responsible for the safe operation and maintenance of its facilities and, therefore, is directly responsible for the management and maintenance of tall growing vegetation that could potentially affect the safe and reliable operation of its transmission lines. Attachment 12 accompanying this Siting Application explains Transource PA's vegetation management practices that will be applied to the 9A West Project.

74. Although the Proposed Route will traverse certain facilities, the 9A West Project will not interfere with the operation of any communication towers, pipelines, or other utilities. Transource PA will work with the incumbent utilities to ensure proper clearances in order to safely operate and maintain the facilities.

75. Several major roadways will be spanned by the proposed 9A West Project. If necessary, Pennsylvania Department of Transportation ("PennDOT") Highway Occupancy Permits or equivalent type permits will be acquired by Transource PA for these major highways and all other state roads prior to construction.

76. The Lost Acres Airport is located approximately 0.6 miles west of the Proposed Route for the 9A West Project. Transource PA does not anticipate any interference with airport operations. However, if necessary, Transource PA will file all required documentation with the Federal Aviation Administration and the Pennsylvania Department of Transportation, Bureau of Aviation.

IX. ENVIRONMENTAL CONSIDERATIONS

77. As noted in the Legal Standards section of this Siting Application, *supra*, Section 27, Article I of the Pennsylvania Constitution, known as the Environmental Rights Amendment ("ERA"), reads as follows:

> The people have a right to clean air, pure water, and to the preservation of the natural, scenic, historic and esthetic values of the environment. Pennsylvania's public natural resources are the common property of all the people, including generations yet to come. As trustee of these resources, the Commonwealth shall conserve and maintain them for the benefit of all the people.

PA. CONST. art. I, § 27.

78. The ERA imposes on the PUC the obligation to consider "the environmental impacts of placing [a building] at [a] proposed location," while also deferring to environmental determinations made by other agencies with primary regulatory jurisdiction over such matters. *See Del-AWARE Unlimited, Inc. v. Pa. Pub. Util. Comm'n*, 513 A.2d 593, 596 (Pa. Cmwlth. 1986).

79. The PUC and its adjudicatory decisions and regulations are subject to the ERA, and all agencies of the Commonwealth are bound by the ERA. *Energy Conservation Council of Pa. v. Pub. Util. Comm'n*, 25 A.3d 440, 446-47 (Pa. Cmwlth. 2011) ("Any decision by the [Commission] as to the environmental impact [of a public utility project] must be set against the backdrop of [the ERA]."); *Pennsylvania Environmental Defense Foundation v. Commonwealth of Pennsylvania*, 161 A.3d 911 (Pa. 2017).

80. The PUC has recognized and acknowledged its obligation to assess the environmental impacts of its decisions in the context of Transource PA's previous filing with the PUC at Docket No. P-2024-3049273 for an exemption from local zoning regulation in connection with the construction of a control building at the Bramah Substation:

> Transource PA's Zoning Petition was unprotested, and the Petition and the manner in which it was filed conform to the requirements of 52 Pa. Code §5.41, 53 P.S. §10619, and the Environmental Rights Amendment, or Article I, Section 27, of the Pennsylvania Constitution. [footnote omitted]. The substation will help to address the State of New Jersey's public policy need pursuant to the SAA process as well as the reliability needs identified by PJM, and the control building is necessary to properly operate the substation. Moreover, in our review, done consistent with our responsibilities set forth in *Marple Twp.,* we do not have any concerns at this time that the control building will have an adverse impact on the environment.[20]

81. Based on the representations contained in this Application and the detailed environmental studies and analyses conducted by Transource PA and its consultants attached hereto, the 9A West Project will not have an adverse impact on the environment, and Transource PA requests that the PUC make such finding in discharging its obligations under the ERA in its final order in this proceeding.

X. COST AND IN-SERVICE DATE

82. The current estimated cost for the total 9AWest Project is approximately $231.3 million, which includes approximately $108.7 million for substation work and approximately $122.6 million for the new Rice-Ringgold 230 kV Transmission Line. This cost estimate includes siting, engineering, procurement, construction, financing, administrative, development, and legal costs.[21]

[20] *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 Substation in Peach Bottom Township, York County, Commonwealth of Pennsylvania,* Docket No P-2024-3049273 (Order entered April 24, 2025), at 11.

[21] All estimates are subject to change as the constructability of the 9A West Project, sequences of construction and other factors may affect cost are identified and analyzed as the project progresses.

83. Subject to the Commission's approval, construction of the 9A West Project is scheduled to begin as soon as practicable following Commission approval to meet an in-service date of January 19, 2029.

XI. NOTICE AND SERVICE

84. As part of the review and comparison of the Alternative Routes, Transource PA supplemented its prior public outreach program. Feedback provided through these outreach efforts was taken into consideration as the Siting Team re-analyzed the Alternative Routes and selected the Proposed Route for the 9A West Project.

85. Transource PA has received and responded to comments from residents and other interested parties. Transource PA will continue responding to comments and inquiries and provide periodic updates to residents and other interested parties. Transource PA will continue its commitment to open communications and, where practical, will be responsive to input regarding the 9A West Project from local residents and other interested parties.

86. A detailed explanation of Transource PA's public outreach efforts is provided in Attachment 4 to this Siting Application.

87. Transource PA has provided public notices in accordance with Sections 57.91 and 69.3102 of the Commission's regulations, 52 Pa. Code §§ 57.91, 69.3102. The public notices for this project are provided in Attachment 14 to this Application.

88. Copies of this Siting Application and Notices of Filing are being served in accordance with the provisions of Section 57.74 of the Commission's regulations, 52 Pa. Code § 57.74.

89. As soon as practicable after the filing of this Application, Transource PA will publish notice of the filing in newspapers of general circulation in the area of the proposed 9A West Project. This notice will: (a) note the filing with the Commission; (b) provide a brief

description of the 9A West Project and its location; (c) provide area locations where the completed Siting Application may be reviewed by the public; and (d) provide any additional information as directed by the Commission.

90. Transource PA also requests that the Commission publish notice of this Siting Application in the Pennsylvania Bulletin.

XII. RELATED PROCEEDINGS

91. As noted above, this Siting Application, the CPC Application and the Zoning Petition are being filed simultaneously with the Commission.

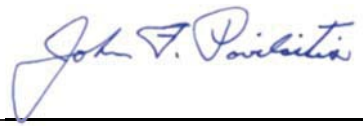
92. This Siting Application, the CPC Application and the Zoning Petition share common and interrelated issues. Pursuant to 52 Pa. Code § 57.75(i)(1), Transource PA requests that all of these related proceedings and filings be consolidated for purposes of hearings, if necessary, and decision.

XIII. CONCLUSION

WHEREFORE, Transource Pennsylvania, LLC respectfully requests that the Pennsylvania Public Utility Commission: (1) consolidate this Siting Application with Transource PA's CPC Application and the Zoning Petition, all of which are being filed concurrently with the PUC; (2) approve the siting and constructing of the Rice-Ringgold 230 kV Transmission Line associated with the 9A West Project in a portions of Franklin County, Pennsylvania as explained above and in the Attachments and Testimony submitted in support of this Siting Application; (3) find that Transource PA has fully evaluated the proposed environmental impacts of the 9A West Project consistent with applicable Pennsylvania law and (4) grant to Transource PA such other

relief as may be just and reasonable, including all other waivers and/or approvals necessary to site the 9A West Project.

Respectfully submitted,



Dated: May 21, 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
PUC REGULATION CROSS-REFERENCE MATRIX

Administrative Code Section or Statue*	PUC Regulation Requirement	Location
57.72	Form and content of application:	
57.72(a)	Applications shall be in conformity with Section 1.31 (relating to form of documentary filings generally). Supporting exhibits such as maps, photographs and other engineering materials may be on paper not exceeding 28 inches by 40 inches.	Siting Application and Attachments 1-14
57.72(b)	The application shall be signed by a person having authority with respect thereto and having knowledge of the matters herein set forth and shall be verified under oath.	Siting Application Verification
57.72(c)	An application shall contain:	
57.72(c)(1)	The name of the applicant and the address of its principal business office.	Siting Application
57.72(c)(2)	The name, title and business address of the attorney of the applicant and the person authorized to receive notice and communications with respect to the application if other than the attorney of the applicant.	Siting Application
57.72(c)(3)	A general description – not a legal or metes and bounds description – of the proposed route of the HV line, to include the number of route miles, the right- of-way width and the location of the proposed HV line within each city, borough, town and township traversed.	Siting Application St. No. 4 and Attachment 4 Siting Study
57.72(c)(4)	The names and addresses of known persons, corporations and other entities of record owning property within the proposed right-of-way, together with an indication of HV line rights-of-way acquired by the applicant.	Siting Application St. No. 6 and Attachment 6
57.72(c)(5)	A general statement of the need for the proposed HV line in meeting identified present and future demands for service, of how the proposed HV line will meet that need and of the engineering justifications for the proposed HV line.	Siting Application Statements Nos. 2, 3 and Attachment 2
57.72(c)(6)	A statement of the safety considerations which will be incorporated into the design, construction and maintenance of the proposed HV line.	Siting Application St. No. 5 and Attachment 5.

Administrative Code Section or Statue*	PUC Regulation Requirement	Location
57.72(c)(7)	A description of studies which had been made as to the projected environmental impact of the HV line as proposed and of the efforts which have been and which will be made to minimize the impact of the HV line upon the environmental and upon scenic and historic areas, including but not limited to impacts, where applicable, upon land use, soil and sedimentation, plant and wildlife habitats, terrain, hydrology and landscape.	Siting Application Attachment 4
52.72(c)(8)	A description of the efforts of the applicant to locate and identify archaeologic, geologic, historic, scenic or wilderness areas of significance within 2 miles of the proposed right-of-way and the location and identity of the areas discovered by the applicant.	Siting Application Attachment 4
57.72(c)(9)	The location and identity of airports within 2 miles of the nearest limit of the right-of-way of the proposed HV line.	Siting Application Attachment 4
57.72(c)(10)	A general description of reasonable alternative routes to the proposed HV line, including a description of the corridor planning methodology, a comparison of the merit and detriments of each route, and a statement of the reasons for selecting the proposed HV line route.	Siting Application Attachment 4
57.72(c)(11)	A list of the local, State and Federal governmental agencies which have requirements which shall be met in connection with the construction or maintenance of the proposed HV line and a list of documents which have been or are required to be filed with those agencies in connection with the siting and construction of the proposed HV line.	Siting Application Attachment 7
57.72(c)(12)	The estimated cost of construction of the proposed HV line, and the projected date for completion.	Siting Application St. No. 1
57.72(c)(13)	The following exhibits:	
57.72(c)(13)(i)	A depiction of the proposed route on aerial photographs and topographic maps of suitable detail.	Siting Application Attachment 4

Administrative Code Section or Statue*	PUC Regulation Requirement	Location
57.72(c)(13)(ii)	A description of the proposed HV line, including the length of the line, the design voltage, the size, number and materials of conductors, the design of the supporting structures and their height, configuration and materials of construction, the average distance between supporting structures, the number of supporting structures, the line to structure clearances and the minimum conductor to ground clearances at mid-span under normal load and average weather conditions and under predicted extreme load and weather conditions.	Siting Application St. No. 5
57.72(c)(13)(iii)	A simple drawing of a cross section of the proposed right-of-way of the HV line and any adjoining rights- of-way showing the placement of the supporting structures at typical locations, with the height and width of the structures, the width of the right-of-way and the lateral distance between the conductors and the edge of the right-of-way indicated.	Siting Application St. No. 5
57.72(c)(13)(iv)	A system map which shows in suitable detail the location and voltage of existing transmission lines and substations of the applicant and the location and voltage of the proposed HV line and associated substations.	Proposed HV line interconnects with a FirstEnergy facility. See also Siting Application St. No. 2 and Attachment 2.1
57.72(c)(14)	A statement identifying litigation concluded or in progress which concerns property or matter relating to the proposed HV line, right-of-way route or environmental matters.	CPC Application and Siting Application
57.72(c)(15)	Additional information as the Commission may require.	---
57.74(a)	(a) *Filing.* The applicant shall file with the Commission the original and six copies of the application. An affidavit of service showing the identity of those served under subsections (b) and (c) shall accompany the original and the copies of the application filed with the Commission.	Siting Application

Administrative Code Section or Statue*	PUC Regulation Requirement	Location
57.74(b)	(b) *Copies.* At the time of filing, the applicant shall serve a copy of the application by registered or certified mail, return receipt requested, upon the following: (1) The chief executive officer, the governing body and the body charged with the duty of planning land use in each city, borough, town, township and county in which any portion of the HV line is proposed to be located. (2) The president of the public utility, other than the applicant, in whose service territory any portion of the HV line is proposed to be located. The Department of Environmental Resources, Attention: Bureau of Environmental Planning; Post Office Box 2357, 101 S. Second Street, Harrisburg, Pennsylvania, 17120. (NOTE: now Department of Environmental Protection at different Harrisburg office).	Certificate of Service
57.74(c)	(c) *Notice.* (1) At the time of filing, the applicant shall serve a notice of filing and a map of suitable detail showing the proposed route of the proposed facility by registered or certified mail, return receipt requested, upon the following: (i) The Secretary of the Department of Transportation, Room 1200 Transportation and Safety Building, Harrisburg, Pennsylvania 17120. (ii) The Chairman of the Historical and Museum Commission, Post Office Box 1026, Harrisburg, Pennsylvania 17120. (iii) Other local, State or Federal agencies designated in § 57.72 (c)(11)(relating to form and content of application). (iv) The persons, corporations, and other entities designated in § 57.72(c)(4), unless they are served with a copy of the application under § 57.75(i) (relating to hearing and notice).	Notice of Filing

Administrative Code Section or Statue*	PUC Regulation Requirement	Location
57.74(c)	(2) The notice of filing shall contain a statement identifying the filing, the date on which the filing was or is to be made, a description of the proposed line, the design voltage, the number of route miles, the right-of-way width and the location of the proposed HV line within each township traversed and a statement that a copy of the application is available for public examination as provided in subsection (d).	Notice of Filing
57.74(d)	(d) *Examination.* On the day of filing of the application, the applicant shall make a copy of the application available for public examination during ordinary business hours at a convenient location within a county in which any part of the proposed HV will be located.	Siting Application St. No. 1 and Attachment 10
57.74(e)	(e) *Additional notice.* The applicant shall provide an additional notice and shall serve such additional copies of the application without cost as the Commission may require.	---
Chapter 69	Interim guidelines require	
69.3102(a)	(a) Applications for electric transmission siting authority should provide the following information with the initial application for siting approval demonstrating its efforts to fully notify landowners who are either owners of land that will be purchased for the transmission project or will be subject to right of way/easement requirements: (1) A Code of Conduct/Internal Practices governing the manner in which public utility employees or their agents interact with landowners along proposed rights of way. (2) Copies of information provided to landowners by the public utility of any publicly disseminated notices advising landowners to contact the Commission or the Office of Consumer Advocate (OCA) in the event of improper land agent practices. (3) Copies of all notices sent under § 57.91 (relating to disclosure of eminent domain power of electric utilities).	Siting Application St. No. 6 and Attachment 14
69.3102(b)	(b) Applicants for transmission siting authority should serve a copy of the Code of Conduct on all landowners along the proposed route whose property is to be purchased, subject to easement rights or borders the transmission corridor. The Code of Conduct should also be available on the applicant's website.	Siting Application St. No. 6 and Attachment 14

Administrative Code Section or Statue*	PUC Regulation Requirement	Location
69.3102(c)	(c) Applicants for transmission siting authority should provide prior notice to the Commission's Office of Communications of informational presentations to community groups by the public utility scheduled after the filing of the transmission siting application so that the Commission, OCA and other interested parties can attend meetings or obtain copies of information being disseminated at the presentations.	At this time, no informal presentations are scheduled for after the Siting Application is filed.
69.3105(1)	Applications for the siting of electric transmission lines should provide the following information as part of the § 57.72(c) (relating to form and content of application) requirements: (1) Transmission applicants should utilize a combination of transmission route evaluation procedures including high-level GIS data, traditional mapping (including United States Geological Survey data and compilation), aerial maps and analysis of physical site specific constraints raised by affected landowners.	Siting Application Attachment 4
69.3105(2)	Applications for the siting of electric transmission lines should provide the following information as part of the § 57.72(c) (relating to form and content of application) requirements: (2) Transmission applicants should summarize the status of property acquisitions (including fee simple acquisitions and rights of way/easements) as part of the application. The applicant should provide the current status and continuing updates on property acquisition litigation or settlements during the course of the siting proceeding.	Siting Application St. Nos. 1, 3
69.3105(3)	Applications for the siting of electric transmission lines should provide the following information as part of the § 57.72(c) (relating to form and content of application) requirements: (3) In providing information regarding the reasonable alternative routes, the utility actively considered in its final phase of the route selection process, and the relative merits of each, in accordance with § 57.72(c)(10), the applicant should include the following information: (i) The environmental, historical, cultural and aesthetic considerations of each route.	Siting Application St. No. 4 and Attachment 4

Administrative Code Section or Statue*	PUC Regulation Requirement	Location
	(ii) The proximity of these alternative routes to residential and nonresidential structures. (iii) The applicant's consideration of relevant existing rights of way. (iv) The comparative construction costs associated with each route.	
69.3105(4)	Applications for the siting of electric transmission lines should provide the following information as part of the § 57.72(c) (relating to form and content of application) requirements: (4) With reference to the proposed route, applicants should provide a summary of efforts made to contact and solicit assistance from local governments and nongovernmental organizations regarding areas encompassed within the requirement of § 57.72(c)(8).	Siting Application St. No. 4 and Attachments 4, 13
69.3106	Applications for siting of electric transmission lines should include as part of the filing requirement under § 57.72(e)(7) the following information: A matrix or list showing all expected Federal, state and local government regulatory permitting or licensing approvals that may be required for the project at the time the application is filed, the issuing agency, approximate timeline for approval and current status. The applicant should provide an update on the status of the regulatory permitting/licensing approvals as the case progresses.	Siting Application Attachment 7

Administrative Code Section or Statue*	PUC Regulation Requirement	Location
69.3107(a)	(a) *Interim guidelines for the use of herbicides and pesticides.* Applicants for transmission line siting authority should provide a detailed vegetation management plan that includes the following components: (1) A general description of the utility's vegetation management plan. (2) Factors that dictate when each method, including aerial spraying, is utilized. (3) Vegetation management practices near aquatic and other sensitive locations. (4) Notice procedures to affected landowners regarding vegetation management practices. (5) Provision of a copy of a landowner maintenance agreement that describes the duties and responsibilities of landowners and the utility for vegetation management to the extent utilized.	Siting Application St. No. 6 and Attachment 12
69.3107(b)	(b) *Interim guidelines for Electromagnetic Field (EMF) impacts.* Transmission siting applications should include the following: A description of the EMF mitigation procedures that the utility proposes to utilize along the transmission line route. This description should include a statement of policy approach for evaluating design and siting alternatives and a description of the proposed measures for mitigating EMF impacts.	Siting Application St. No. 5 and Attachment 11

*Pennsylvania Code 57.71 – 57.75 relates to "Commission Review of Siting and Construction of Electric Transmission Lines". Pennsylvania Code 69.3101 – 69.3107 relates to "General Orders, Policy Statements, and Guidelines on Fixed Utilities". Sections described within

ATTACHMENT 1 pertains specifically to those items required to be included for an application filing.

ATTACHMENT 2

ATTACHMENT 2

NECESSITY STATEMENT

1.0 INTRODUCTION

Transource Pennsylvania, LLC ("Transource PA" or the "Company") seeks approval from the Pennsylvania Public Utility Commission (“Commission" or "PUC") for the siting and construction of the Pennsylvania portion of the Rice-Ringgold 230 kV Transmission Line in Franklin County, Pennsylvania. The proposed Rice-Ringgold 230 kV Transmission Line is part of the 9A West Project ("9A West Project") approved by PJM Interconnection, L.L.C. ("PJM") to alleviate transmission congestion constraints in Pennsylvania, Maryland, West Virginia, and Virginia.

The 9A West Project 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. Transource PA herein seeks Commission approval of the siting and construction of the 9A West Project in Franklin County, Pennsylvania.

Transource PA is obligated and responsible for the construction, ownership, maintenance and operation of the Pennsylvania portion of the 9A West Project. The Maryland portion of the 9A West Project will be constructed and owned by Transource PA's Maryland affiliate.

The current estimated cost for the total 9A West Project is approximately $231.3 million, which includes approximately $108.7 million for substation work and approximately $122.6 million for the new Rice-Ringgold 230 kV Transmission Line. This cost estimate includes siting, engineering,

procurement, construction, financing, administrative, development, and legal costs. This total estimate is based upon an initial planning level estimate of approximately $112.7 million, a contingency of $10 million, and taxes and escalation to the latest in-service date of 2029 of approximately $170.4 million. The estimate also reflects 90% design and engineering, refinements from the project route following the bid, and vendor quotes received.

2.0 PROJECT NEED

RTOs, or regional transmission organizations, are responsible for regional and interregional transmission planning, and for operating the interstate transmission system. The Federal Energy Regulatory Commission ("FERC") encouraged the formation of RTOs.[1] One core function of RTOs is to provide for the independent operational control over transmission facilities owned by utilities that are placed under the RTO's control.[2]

PJM is a FERC-approved RTO charged with maintaining the reliable and efficient operation of the electric transmission system under its functional control and coordinating the transmission of electricity through all or parts of thirteen states, including Pennsylvania, and the District of Columbia.

In order to maintain reliable transmission service, PJM conducts an annual Regional Transmission Expansion Plan ("RTEP") process,[3] which includes a comprehensive series of

[1] *See* Order No. 2000, Regional Transmission Organizations, 65 Fed. Reg. 810, 811 (Jan. 6, 2000) (codified at 18 C.F.R. pt. 35).
[2] *Id*. at 811.
[3] PJM's RTEP process is set forth in Schedule 6 of PJM's Amended and Restated Operating Agreement ("Schedule 6"). Schedule 6 governs the process by which PJM's members rely on PJM to prepare an annual regional plan for the enhancement and expansion of the transmission facilities to maintain long-term, reliable electric service consistent with established reliability criteria, as well as to plan transmission facilities needed to address market efficiency and public policy-related drivers. In addition, Schedule 6 addresses the procedures used to develop the RTEP, the review

detailed analyses to identify transmission solutions needed to maintain reliable electric service, as well as to address market efficiency and public policy requirements.[4]

As relevant to this proceeding, the RTEP's market efficiency analysis, which is set forth in Schedule 6, section 1.5.7 ("Market Efficiency Analysis") identifies congestion on electric transmission facilities that have economic or wholesale market effects, as well as potential improvements to electric transmission economic efficiencies. The electric transmission needs identified in this analysis stem from the fact that the PJM transmission grid provides the means for generators to participate in a competitive wholesale market to supply electricity, both capacity and energy, to customers in PJM's geographic footprint no matter where in this area the electrical load is located.

When PJM's Market Efficiency Analysis identifies a need to relieve congestion on electric transmission facilities, PJM opens a competitive proposal window pursuant to Schedule 6, section 1.5.8(c), to solicit the submittal of potential solutions *(i.e.,* market efficiency projects) to address those needs. FERC has found that PJM's solicitation of market efficiency project submittals through the competitive proposal window complies with the requirements of FERC Order No. 1000.[5] Potential solutions are evaluated using two criteria: first, the project must address the congestion identified in the Market Efficiency Analysis; and, second, the project

---

and approval process for the RTEP, the obligation of transmission owners to build transmission upgrades included in the RTEP, and the process by which interregional transmission upgrades will be developed.

[4] PJM Manual 14B outlines the RTEP process and reliability criteria used for this process. PJM Manual 14B is available at: http://www.pim.eom/~/media/docunients/manuals/ml4b.ashx,

[5] A summary of FERC Order No. 1000 is available at: http://www.ferc.gov/industries/electric/indus- act/trans-plan.asp.

benefits must exceed the costs by at least 25 percent.[6] In addition, the project must meet PJM's congestion criteria and not create additional unacceptable congestion elsewhere on the system.

Market efficiency projects that are selected through PJM's competitive window process are discussed with PJM stakeholders and recommended to the PJM Board of Managers ("PJM Board") for approval. If approved, such market efficiency projects are included in the RTEP as baseline projects.

After extensive evaluation and review with stakeholders, PJM selected Project 9A to address the needs identified in PJM's "2014/15 RTEP Long Term Proposal Window," because it provided the highest benefit-to-cost ratio ("B/C ratio"), the most total congestion savings, and the most production cost savings.[7] As part of the 2014/2015 RTEP, PJM estimated that Project 9A (of which the 9A West Project is a part) could lower wholesale electricity costs in congested-constrained regions.

On August 2, 2016, the PJM Board approved Project 9A as baseline upgrade numbers b2743 and b2752, which included the 9A West Project.

[6] Project benefits are measured by comparing the benefits in the form of net load payments and/or production costs with and without the proposed project for a 15-year study period. The economic benefit/cost ratio threshold test is set forth in PJM Manual 14B, Attachment E, available at: http://www.pim.eom/~/media/documents/manuals/ml4b.ashx.

[7]The recommendation of PJM staff to approve Project 9A is available at: PJM Regional Transmission Expansion Plan See page 20.

PJM has conducted periodic annual re-evaluations of Project 9A West since the project was placed in suspension status in 2021. PJM's 2025 annual re-evaluation showed a 3.74 B/C ratio for the original configuration of Project 9A and a 3.85 B/C ratio for the western portion of the project only, i.e., the 9A West Project.

While other RTEP projects have been constructed since 2021 and therefore have obviated the need for what had been the eastern portion of the original Project 9A, PJM's staff recommended to PJM's Boad of Managers in May 2025 that the 9A West Project be continued given its positive benefits and favorable B/C ratio.

On July 30, 2025, the PJM Board of Managers approved the recommended modification of Project 9A's scope, finding that the 9A West Project is needed and supports the prompt construction of needed infrastructure in the region.

3.0 PROPOSED SOLUTION

The 9A West Project approved by PJM involves 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.

A map of the existing and proposed systems in the Project area is provided as **Attachment 2.1**. A one-line diagram of the proposed 9A West Project is provided as **Attachment 2.2**.

The 9A West Project will alleviate the transmission congestion constraints identified by PJM in Pennsylvania, Maryland, West Virginia, and Virginia. The 9A West Project is required to resolve

the congestion problem first identified in the 2014/2015 RTEP Long Term Proposal Window and as further reviewed and updated by PJM in 2025.

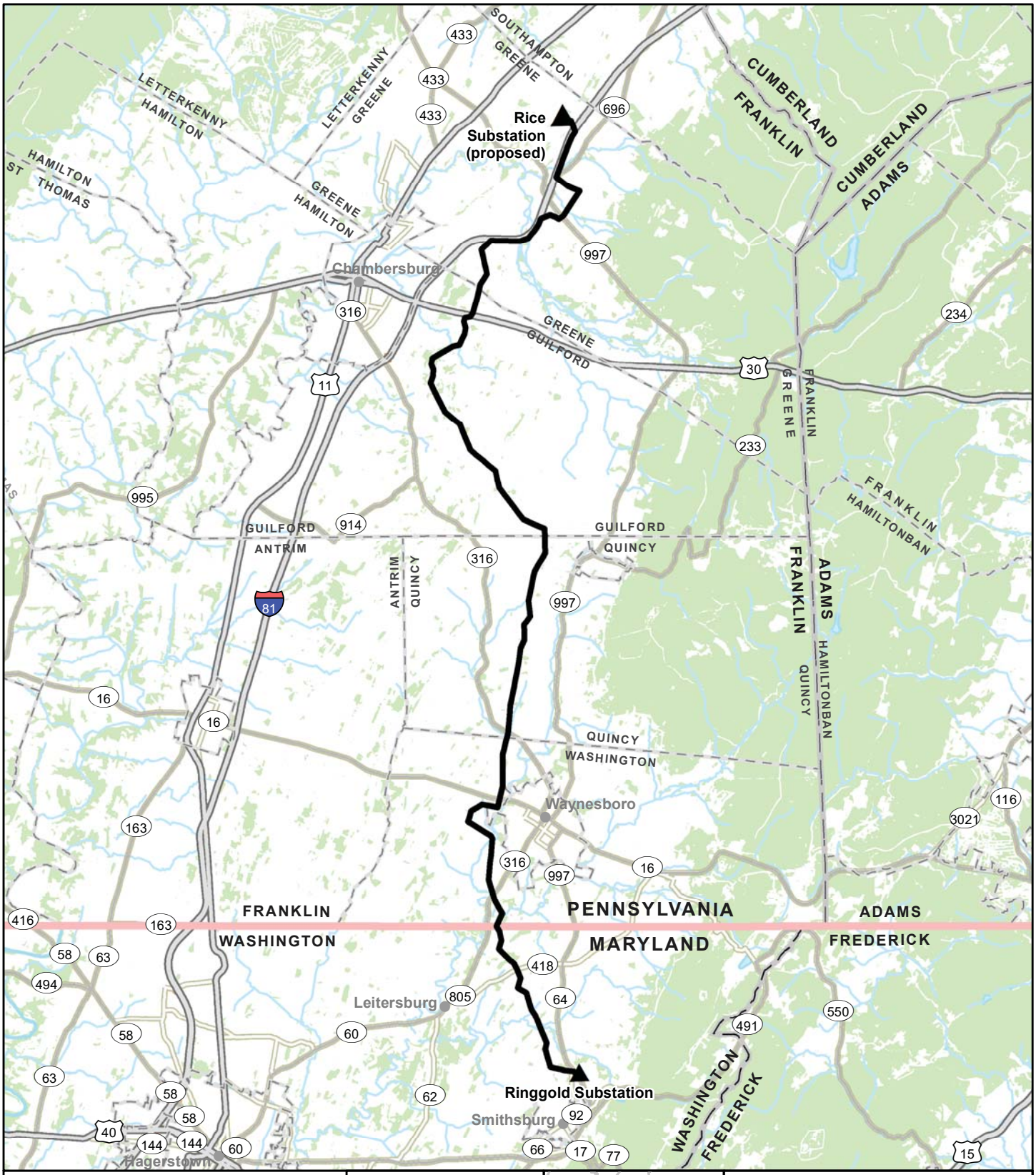
On April 2, 2026, PJM and Transource Energy,[8] on behalf of Transource PA and Transource MD, completed and executed an amended Designated Entity Agreement ("DEA") for the 9A West Project.

The DEA between PJM and Transource, among other things, obligates Transource to "design, engineer, procure, install, construct, own, operate and maintain" the 9A West Project within the agreed upon cost constraints and timelines defined by the two parties. The DEA has appendices that contain relevant project details, such as the scope of work, the development schedule and cost commitments.

The fully executed DEA for the 9A West Project was filed at FERC on May 1, 2026, for FERC's review and acceptance. When a DEA is accepted by FERC, it means that FERC has found that the agreement, as filed, is consistent with the Federal Power Act and PJM's governing documents, and has allowed the agreement to take effect as part of PJM's FERC-approved framework. Acceptance by FERC reflects that the agreement is not shown to be unjust, unreasonable or unduly discriminatory.

[8] Transource Energy, LLC is the parent company of Transource PA and Transource MD.

ATTACHMENT 2.1



- Substation
- Alternative Route C (Proposed Route)
- Highway
- Road
- Stream
- Forest Cover

Data Sources: Transource (2026), Rextag Electric Transmission (2021), NLCD Forest Cover (2024)

Coordinate System:
UTM Zone 18N
NAD 83

May 03, 2026



Figure 1
Proposed Route

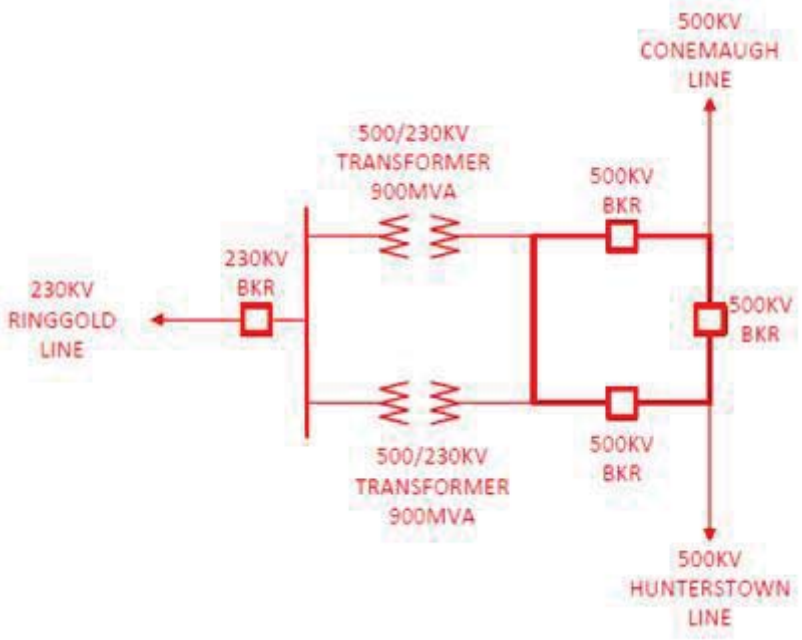
Rice - Ringgold 230 kV
Transmission Line Project

TRANSOURCE

0 1 2 3 4
Miles

ATTACHMENT 2.2

Current diagrams:



ATTACHMENT 3

Service Agreement No. 4579

AMENDED DESIGNATED ENTITY AGREEMENT

Between

PJM Interconnection, L.L.C.

And

Transource Energy, LLC, for itself and on behalf of
Transource Maryland, LLC and Transource Pennsylvania, LLC

RTEP Projects: b2743.1 and b2743.5

2014/2015 Window 1 -Transource Projects

AMENDED DESIGNATED ENTITY AGREEMENT

Between

PJM Interconnection, L.L.C.

And

Transource Energy, LLC, for itself and on behalf of
Transource Maryland, LLC and Transource Pennsylvania, LLC

This Amended Designated Entity Agreement, including the Schedules attached hereto and incorporated herein (collectively, "Agreement") is made and entered into as of the Effective Date between PJM Interconnection, L.L.C. ("Transmission Provider" or "PJM"), and Transource Energy, LLC ("Designated Entity" or "Transource"), referred to herein individually as "Party" and collectively as "the Parties."

WITNESSETH

WHEREAS, in accordance with FERC Order No. 1000 and Schedule 6 of the Amended and Restated Operating Agreement of PJM Interconnection, L.L.C. ("Operating Agreement"), Transmission Provider is required to designate among candidates, pursuant to a FERC-approved process, an entity to develop and construct a specified project to expand, replace and/or reinforce the Transmission System operated by Transmission Provider;

WHEREAS, pursuant to Section 1.5.8(i) of Schedule 6 of the Operating Agreement, the Transmission Provider notified Designated Entity that it was designated as the Designated Entity for the Project (described in Schedule A to this Agreement) to be included in the Regional Transmission Expansion Plan;

WHEREAS, pursuant to Section 1.5.8(j) of Schedule 6 of the Operating Agreement, Designated Entity accepted the designation as the Designated Entity for the Project and therefore has the obligation to construct the Project; and

NOW, THEREFORE, in consideration of the mutual covenants herein contained, together with other good and valuable consideration, the receipt and sufficiency is hereby mutually acknowledged by each Party, the Parties mutually covenant and agree as follows:

Article 1 – Definitions

1.0 Defined Terms.

All capitalized terms used in this Agreement shall have the meanings ascribed to them in Part I of the Tariff or in definitions either in the body of this Agreement or its attached Schedules. In the event of any conflict between defined terms set forth in the Tariff or defined terms in this Agreement, including the Schedules, such conflict will be resolved in favor of the terms as defined in this Agreement.

1.1 Confidential Information.

Any confidential, proprietary, or trade secret information of a plan, specification, pattern, procedure, design, device, list, concept, policy, or compilation relating to the Project or Transmission Owner facilities to which the Project will interconnect, which is designated as confidential by the party supplying the information, whether conveyed verbally, electronically, in writing, through inspection, or otherwise, and shall include, but may not be limited to, information relating to the producing party's technology, research and development, business affairs and pricing, land acquisition and vendor contracts relating to the Project.

1.2 Designated Entity Letter of Credit.

Designated Entity Letter of Credit shall mean the letter of credit provided by the Designated Entity pursuant to Section 1.5.8(j) of Schedule 6 of the Operating Agreement and Section 3.0 of this Agreement as security associated with the Project.

1.3 Development Schedule.

Development Schedule shall mean the schedule of milestones set forth in Schedule C of this Agreement.

1.4 Effective Date.

Effective Date shall mean the date this Agreement becomes effective pursuant to Section 2.0 of this Agreement.

1.5 Initial Operation.

Initial Operation shall mean the date the Project is (i) energized and (ii) under Transmission Provider operational dispatch.

1.6 Project.

Project shall mean the enhancement or expansion included in the PJM Regional Transmission Expansion Plan described in Schedule A of this Agreement.

1.7 Project Finance Entity.

Project Finance Entity shall mean holder, trustee or agent for holders, of any component of Project Financing.

1.8 Project Financing.

Project Financing shall mean: (a) one or more loans, leases, equity and/or debt financings, together with all modifications, renewals, supplements, substitutions and replacements thereof, the proceeds of which are used to finance or refinance the costs of the Project, any alteration, expansion or improvement to the Project, or the operation of the Project; or (b) loans and/or debt issues secured by the Project.

1.9 Reasonable Efforts.

Reasonable Efforts shall mean such efforts as are consistent with ensuring the timely and effective design and construction of the Project in a manner, which ensures that the Project, once placed in service, meets the requirements of the Project as described in Schedule B and are consistent with Good Utility Practice.

1.10 Required Project In-Service Date.

Required Project In-Service Date shall mean the date the Project is required to: (i) be completed in accordance with the Scope of Work in Schedules B this Agreement, (ii) meet the criteria outlined in Schedule D of this Agreement and (iii) be under Transmission Provider operational dispatch.

Article 2 – Effective Date and Term

2.0 Effective Date.

Subject to regulatory acceptance, this Agreement shall become effective on the date the Agreement has been executed by all Parties, or if this Agreement is filed with FERC for acceptance, rather than reported only in PJM's Electric Quarterly Report, upon the date specified by FERC.

2.1 Term.

This Agreement shall continue in full force and effect from the Effective Date until: (i) the Designated Entity executes the Consolidated Transmission Owners Agreement; and (ii) the Project (a) has been completed in accordance with the terms and conditions of this Agreement, (b) meets all relevant required planning criteria, and (c) is under Transmission Provider's operational dispatch; or (iii) the Agreement is terminated pursuant to Article 8 of this Agreement.

Article 3 – Security

3.0 Obligation to Provide Security.

In accordance with Section 1.5.8(j) of Schedule 6 of the Operating Agreement, Designated Entity shall provide Transmission Provider a letter of credit as acceptable to Transmission Provider (Designated Entity Letter of Credit) or cash security in the amount of $6,792,992, which is three percent of the estimated cost of the Project. Designated Entity is required provide and maintain the Designated Entity Letter of Credit, as required by Section 1.5.8(j) of Schedule 6 of the Operating Agreement and Section 3.0 of this Agreement. The Designated Entity Letter of Credit shall remain in full force and effect for the term of this Agreement and for the duration of the obligations arising therefrom in accordance with Article 17.0. Notwithstanding the foregoing, the Designated Entity is not required to provide a letter of credit or cash security to the extent (i) the Designated Entity is a Transmission Owner and (ii) the Project was selected (A) pursuant to Operating Agreement, Schedule 6, sections 1.5.8(g), 1.5.8(h), or 1.5.8(m)(1); or (B) through a proposal window conducted pursuant to Operating Agreement, Schedule 6, section 1.5.8(c) in which no Nonincumbent Developer submitted a competing proposal to address the need identified by the Transmission Provider.

3.1 Distribution of Designated Entity Letter of Credit or Cash Security.

In the event that Transmission Provider draws upon the Designated Entity Letter of Credit or retains the cash security in accordance with Sections 7.5, 8.0, or 8.1, Transmission Provider shall distribute such funds as determined by FERC.

Article 4 – Project Construction

4.0 Construction of Project by Designated Entity.

Designated Entity shall design, engineer, procure, install and construct the Project, including any modifications thereto, in accordance with: (i) the terms of this Agreement, including but not limited to the Scope of Work in Schedule B and the Development Schedule in Schedule C; (ii) applicable reliability principles, guidelines, and standards of the Applicable Regional Reliability Council and NERC; (iii) the Operating Agreement; (iv) the PJM Manuals; and (v) Good Utility Practice.

4.1 Milestones.

4.1.0 Milestone Dates.

Designated Entity shall meet the milestone dates set forth in the Development Schedule in Schedule C of this Agreement. Milestone dates set forth in Schedule C only may be extended by Transmission Provider in writing. Failure to meet any of the milestone dates specified in Schedule C, or as extended as described in this Section 4.1.0 or Section 4.3.0 of this Agreement, shall constitute a Breach of this Agreement. Transmission Provider reasonably may extend any such milestone date, in the event of delays not caused by the Designated Entity that could not be remedied by the Designated Entity through the exercise of due diligence, or if an extension will not delay the Required Project In-Service Date specified in Schedule C of this Agreement;

provided that a corporate officer of the Designated Entity submits a revised Development Schedule containing revised milestones and showing the Project in full operation no later than the Required Project In-Service Date specified in Schedule C of this Agreement.

4.1.1 Right to Inspect.

Upon reasonable notice, Transmission Provider shall have the right to inspect the Project for the purposes of assessing the progress of the Project and satisfaction of milestones. Such inspection shall not be deemed as review or approval by Transmission Provider of any design or construction practices or standards used by the Designated Entity.

4.2 Applicable Technical Requirements and Standards.

For the purposes of this Agreement, applicable technical requirements and standards of the Transmission Owner(s) to whose facilities the Project will interconnect shall apply to the design, engineering, procurement, construction and installation of the Project to the extent that the provisions thereof relate to the interconnection of the Project to the Transmission Owner(s) facilities.

4.3 Project Modification.

4.3.0 Project Modification Process.

The Scope of Work and Development Schedule, including the milestones therein, may be revised, as required, in accordance with Transmission Provider's project modification process set forth in the PJM Manuals, or otherwise by Transmission Provider in writing. Such modifications may include alterations as necessary and directed by Transmission Provider to meet the system condition for which the Project was included in the Regional Transmission Expansion Plan.

4.3.1 Consent of Transmission Provider to Project Modifications.

Designated Entity may not modify the Project without prior written consent of Transmission Provider, including but not limited to, modifications necessary to obtain siting approval or necessary permits, which consent shall not be unreasonably withheld, conditioned, or delayed.

4.3.2 Customer Facility Interconnections And Transmission Service Requests.

Designated Entity shall perform or permit the engineering and construction necessary to accommodate the interconnection of Customer Facilities to the Project and transmission service requests that are determined necessary for such interconnections and transmission service requests in accordance with Parts IV and VI, and Parts II and III, respectively, of the Tariff.

4.4 Project Tracking.

The Designated Entity shall provide regular, quarterly construction status reports in writing to Transmission Provider. The reports shall contain, but not be limited to, updates and information

specified in the PJM Manuals regarding: (i) current engineering and construction status of the Project; (ii) Project completion percentage, including milestone completion; (iii) current target Project or phase completion date(s); (iv) applicable outage information; and (v) cost expenditures to date and revised projected cost estimates for completion of the Project. Transmission Provider shall use such status reports to post updates regarding the progress of the Project.

4.5 Exclusive Responsibility of Designated Entity.

Designated Entity shall be solely responsible for all planning, design, engineering, procurement, construction, installation, management, operations, safety, and compliance with applicable laws and regulations associated with the Project, including but not limited to obtaining all necessary permits, siting, and other regulatory approvals. Transmission Provider shall have no responsibility to manage, supervise, or ensure compliance or adequacy of same.

Article 5 – Coordination with Third-Parties

5.0 Interconnection Coordination Agreement with Transmission Owner(s).

By the dates specified in the Development Schedule in Schedule C of this Agreement, Designated Entity shall execute or request to file unexecuted with the Commission: (a) an Interconnection Coordination Agreement; and (b) an interconnection agreement among and between Designated Entity, Transmission Provider, and the Transmission Owner(s) to whose facilities the Project will interconnect.

5.1 Connection with Entities Not a Party to the Consolidated Transmission Owners Agreement.

Designated Entity shall not permit any part of the Project facilities to be connected with the facilities of any entity which is not: (i) a party to Consolidated Transmission Owners Agreement without an interconnection agreement that contains provisions for the safe and reliable interconnection and operation of such interconnection in accordance with Good Utility Practice, and principles, guidelines and standards of the Applicable Regional Reliability Council and NERC or comparable requirements of an applicable retail tariff or agreement approved by appropriate regulatory authority; or (ii) a party to a separate Designated Entity Agreement.

Article 6 – Insurance

6.0 Designated Entity Insurance Requirements.

Designated Entity shall obtain and maintain in full force and effect such insurance as is consistent with Good Utility Practice. The Transmission Provider shall be included as an Additional Insured in the Designated Entity's applicable liability insurance policies. The Designated Entity shall provide evidence of compliance with this requirement upon request by the Transmission Provider.

6.1 Subcontractor Insurance.

In accord with Good Utility Practice, Designated Entity shall require each of its subcontractors to maintain and, upon request, provide Designated Entity evidence of insurance coverage of types, and in amounts, commensurate with the risks associated with the services provided by the subcontractor. Bonding and hiring of contractors or subcontractors shall be the Designated Entity's discretion, but regardless of bonding or the existence or non-existence of insurance, the Designated Entity shall be responsible for the performance or non-performance of any contractor or subcontractor it hires.

Article 7 – Breach and Default

7.0 Breach.

Except as otherwise provided in Article 10, a Breach of this Agreement shall include:

(a) The failure to comply with any term or condition of this Agreement, including but not limited to, any Breach of a representation, warranty, or covenant made in this Agreement, and failure to provide and maintain security in accordance with Section 3.0 of this Agreement;

(b) The failure to meet a milestone or milestone date set forth in the Development Schedule in Schedule C of this Agreement, or as extended in writing as described in Sections 4.1.0 and 4.3.0 of this Agreement;

(c) Assignment of this Agreement in a manner inconsistent with the terms of this Agreement; or

(d) Failure of any Party to provide information or data required to be provided to another Party under this Agreement for such other Party to satisfy its obligations under this Agreement.

7.1 Notice of Breach.

In the event of a Breach, a Party not in Breach of this Agreement shall give written notice of such Breach to the breaching Party, and to any other persons, including a Project Finance Entity, if applicable, that the breaching Party identifies in writing prior to the Breach. Such notice shall set forth, in reasonable detail, the nature of the Breach, and where known and applicable, the steps necessary to cure such Breach.

7.2 Cure and Default.

A Party that commits a Breach and does not take steps to cure the Breach pursuant to Section 7.3 shall be in Default of this Agreement.

7.3 Cure of Breach.

The breaching Party may: (i) cure the Breach within thirty days from the receipt of the notice of Breach or other such date as determined by Transmission Provider to ensure that the Project meets its Required Project In-Service Date set forth in Schedule C; or, (ii) if the Breach cannot be cured within thirty days but may be cured in a manner that ensures that the Project meets the Required Project In-Service Date for the Project, within such thirty day time period, commences in good faith steps that are reasonable and appropriate to cure the Breach and thereafter diligently pursue such action to completion.

7.4 Re-evaluation if Breach Not Cured.

In the event that a breaching Party does not cure a Breach in accordance with Section 7.3 of this Agreement, Transmission Provider shall conduct a re-evaluation pursuant to Section 1.5.8(k) of Schedule 6 of the Operating Agreement. If based on such re-evaluation, the Project is retained in the Regional Transmission Expansion Plan and the Designated Entity's designation for the Project also is retained, the Parties shall modify this Agreement, including Schedules, as necessary. In all other events, Designated Entity shall be considered in Default of this Agreement, and this Agreement shall terminate in accordance with Section 8.1 of this Agreement.

7.5 Remedies.

Upon the occurrence of an event of Default, the non-Defaulting Party shall be entitled to: (i) commence an action to require the Defaulting Party to remedy such Default and specifically perform its duties and obligations hereunder in accordance with the terms and conditions hereof; (ii) suspend performance hereunder; and (iii) exercise such other rights and remedies as it may have in equity or at law. Upon Default by Designated Entity, Transmission Provider may draw upon the Designated Entity Letter of Credit. Nothing in this Section 7.5 is intended in any way to affect the rights of a third-party to seek any remedy it may have in equity or at law from the Designated Entity resulting from Designated Entity's Default of this Agreement.

7.6 Remedies Cumulative.

No remedy conferred by any provision of this Agreement is intended to be exclusive of any other remedy and each and every remedy shall be cumulative and shall be in addition to every other remedy given hereunder or now or hereafter existing at law or in equity or by statute or otherwise. The election of any one or more remedies shall not constitute a waiver of the right to pursue other available remedies.

7.7 Waiver.

Any waiver at any time by any Party of its rights with respect to a Breach or Default under this Agreement, or with respect to any other matters arising in connection with this Agreement, shall

not be deemed a waiver or continuing waiver with respect to any other Breach or Default or other matter.

Article 8 – Early Termination

8.0 Termination by Transmission Provider.

In the event that: (i) pursuant to Section 1.5.8(k) of Schedule 6 of the Operating Agreement, Transmission Provider determines to remove the Project from the Regional Transmission Expansion Plan and/or not to retain Designated Entity's status for the Project; (ii) Transmission Provider otherwise determines pursuant to Regional Transmission Expansion Planning Protocol in Schedule 6 of the Operating Agreement that the Project is no longer required to address the specific need for which the Project was included in the Regional Transmission Expansion Plan; or (iii) an event of force majeure, as defined in section 10.0 of this Attachment KK, or other event outside of the Designated Entity's control that, with the exercise of Reasonable Efforts, Designated Entity cannot alleviate and which prevents the Designated Entity from satisfying its obligations under this Agreement, Transmission Provider may terminate this Agreement by providing written notice of termination to Designated Entity, which shall become effective the later of sixty calendar days after the Designated Entity receives such notice or other such date the FERC establishes for the termination. In the event termination pursuant to this Section 8.0 is based on (ii) or (iii) above, Transmission Provider shall not have the right to draw upon the Designated Entity Letter of Credit or retain the cash security and shall cancel the Designated Entity Letter of Credit or return the cash security within thirty days of the termination of this Agreement.

8.1 Termination by Default.

This Agreement shall terminate in the event a Party is in Default of this Agreement in accordance with Sections 7.2 or 7.4 of this Agreement. Upon Default by Designated Entity, Transmission Provider may draw upon the Designated Entity Letter of Credit or retain the cash security.

8.2 Filing at FERC.

Transmission Provider shall make the appropriate filing with FERC as required to effectuate the termination of this Agreement pursuant to this Article 8.

Article 9 – Liability and Indemnity

9.0 Liability.

For the purposes of this Agreement, Transmission Provider's liability to the Designated Entity, any third-party, or any other person arising or resulting from any acts or omissions associated in any way with performance under this Agreement shall be limited in the same manner and to the same extent that Transmission Provider's liability is limited to any Transmission Customer, third-party or other person under Section 10.2 of the Tariff arising or resulting from any act or omission in any way associated with service provided under the Tariff or any Service Agreement thereunder.

9.1 Indemnity.

For the purposes of this Agreement, Designated Entity shall at all times indemnify, defend, and save Transmission Provider and its directors, managers, members, shareholders, officers and employees harmless from, any and all damages, losses, claims, including claims and actions relating to injury to or death of any person or damage to property, demands, suits, recoveries, costs and expenses, court costs, attorney fees, and all other obligations by or to third-parties, arising out of or resulting from the Transmission Provider's acts or omissions associated with the performance of its obligations under this Agreement to the same extent and in the same manner that a Transmission Customer is required to indemnify, defend and save Transmission Provider and its directors, managers, members, shareholders, officers and employees harmless under Section 10.3 of the Tariff.

Article 10 – Force Majeure

10.0 Force Majeure.

For the purpose of this section, an event of force majeure shall mean any cause beyond the control of the affected Party, including but not restricted to, acts of God, flood, drought, earthquake, storm, fire, lightening, epidemic, war, riot, civil disturbance or disobedience, labor dispute, labor or material shortage, sabotage, acts of public enemy, explosions, orders, regulations or restrictions imposed by governmental, military, or lawfully established civilian authorities, which in any foregoing cases, by exercise of due diligence, it has been unable to overcome. An event of force majeure does not include: (i) a failure of performance that is due to an affected Party's own negligence or intentional wrongdoing; (ii) any removable or remedial causes (other than settlement of a strike or labor dispute) which an affected Party fails to remove or remedy within a reasonable time; or (iii) economic hardship of an affected Party.

10.1 Notice.

A Party that is unable to carry out an obligation imposed on it by this Agreement due to Force Majeure shall notify the other Party in writing within a reasonable time after the occurrence of the cause relied on.

10.2 Duration of Force Majeure.

A Party shall not be responsible for any non-performance or considered in Breach or Default under this Agreement, for any deficiency or failure to perform any obligation under this Agreement to the extent that such failure or deficiency is due to Force Majeure. A Party shall be excused from whatever performance is affected only for the duration of the Force Majeure and while the Party exercises Reasonable Efforts to alleviate such situation. As soon as the non-performing Party is able to resume performance of its obligations excused because of the occurrence of Force Majeure, such Party shall resume performance and give prompt notice thereof to the other Party. In the event that Designated Entity is unable to perform any of its obligations under this Agreement

because of an occurrence of Force Majeure, Transmission Provider may terminate this Agreement in accordance with Section 8.0 of this Agreement.

10.3 Breach or Default of or Force Majeure under Interconnection Coordination Agreement

If either of the following events prevents Designated Entity from performing any of its obligations under this Agreement, such event shall be considered a Force Majeure event under this Agreement and the provisions of this Article 10 shall apply: (i) a breach or default of the Interconnection Coordination Agreement associated with the Project by a party to the Interconnection Coordination Agreement other than the Designated Entity; or (ii) an event of Force Majeure under the Interconnection Coordination Agreement associated with the Project.

Article 11 – Assignment

11.0 Assignment.

A Party may assign all of its rights, duties, and obligations under this Agreement in accordance with this Section 11.0. Except for assignments described in Section 11.1 of this Agreement that may not result in the assignment of all rights, duties, and obligations under this Agreement to a Project Finance Entity, no partial assignments will be permitted. No Party may assign any of its rights or delegate any of its duties or obligations under this Agreement without prior written consent of the other Party, which consent shall not be unreasonably withheld, conditioned, or delayed. Any such assignment or delegation made without such written consent shall be null and void. Assignment by the Designated Entity shall be contingent upon, prior to the effective date of the assignment: (i) the Designated Entity or assignee demonstrating to the satisfaction of Transmission Provider that the assignee has the technical competence and financial ability to comply with the requirements of this Agreement and to construct the Project consistent with the assignor's cost estimates for the Project; and (ii) the assignee is eligible to be a Designated Entity for the Project pursuant to Sections 1.5.8(a) and (f) of Schedule 6 of the Operating Agreement. Except as provided in an assignment to a Finance Project Entity to the contrary, for all assignments by any Party, the assignee must assume in a writing, to be provided to the other Party, all rights, duties, and obligations of the assignor arising under this Agreement. Any assignment described herein shall not relieve or discharge the assignor from any of its obligations hereunder absent the written consent of the other Party. In no circumstance, shall an assignment of this Agreement or any of the rights, duties, and obligations under this Agreement diminish the rights of the Transmission Provider under this Agreement, the Tariff, or the Operating Agreement. Any assignees that will construct, maintain, or operate the Project shall be subject to, and comply with the terms of this Agreement, the Tariff and the Operating Agreement.

11.1 Project Finance Entity Assignments

11.1.1 Assignment to Project Finance Entity

If an arrangement between the Designated Entity and a Project Finance Entity provides that the Project Finance Entity may assume any of the rights, duties and obligations of the Designated Entity under this Agreement or otherwise provides that the Project Finance Entity may cure a Breach of this Agreement by the Designated Entity, the Project Finance Entity may be assigned this Agreement or any of the rights, duties, or obligations hereunder only upon written consent of the Transmission Provider, which consent shall not be unreasonably withheld, conditioned, or delayed. In no circumstance, shall an assignment of this Agreement or any of the rights, duties, and obligations under this Agreement diminish the rights of the Transmission Provider under this Agreement, the Tariff, or the Operating Agreement.

11.1.2 Assignment By Project Finance Entity

A Project Finance Entity that has been assigned this Agreement or any of the rights, duties or obligations under this Agreement or otherwise is permitted to cure a Breach of this Agreement, as described pursuant to Section 11.1.1 above, may assign this Agreement or any of the rights, duties or obligations under this Agreement to another entity not a Party to this Agreement only: (i) upon the Breach of this Agreement by the Designated Entity; and (ii) with the written consent of the Transmission Provider, which consent shall not be unreasonably withheld, conditioned, or delayed. In no circumstance, shall an assignment of this Agreement or any of the rights, duties, and obligations under this Agreement alter or diminish the rights of the Transmission Provider under this Agreement, the Tariff, or the Operating Agreement. Any assignees that will construct, maintain, or operate the Project shall be subject to, and comply with the Tariff and Operating Agreement.

Article 12 – Information Exchange

12.0 Information Access.

Subject to Applicable Laws and Regulations, each Party shall make available to the other Party information necessary to carry out each Party's obligations and responsibilities under this Agreement, the Operating Agreement, and the Tariff. Such information shall include but not be limited to, information reasonably requested by Transmission Provider to prepare the Regional Transmission Expansion Plan. The Parties shall not use such information for purposes other than to carry out their obligations or enforce their rights under this Agreement, the Operating Agreement, and the Tariff.

12.1 Reporting of Non-Force Majeure Events.

Each Party shall notify the other Party when it becomes aware of its inability to comply with the provisions of this Agreement for a reason other than Force Majeure. The Parties agree to cooperate with each other and provide necessary information regarding such inability to comply, including,

but not limited to, the date, duration, reason for the inability to comply, and corrective actions taken or planned to be taken with respect to such inability to comply. Notwithstanding the foregoing, notification, cooperation or information provided under this Section 12.1 shall not entitle the receiving Party to allege a cause of action for anticipatory Breach of this Agreement.

Article 13 – Confidentiality

13.0 Confidentiality.

For the purposes of this Agreement, information will be considered and treated as Confidential Information only if it meets the definition of Confidential Information set forth in Section 1.1 of this Agreement and is clearly designated or marked in writing as "confidential" on the face of the document, or, if the information is conveyed orally or by inspection, if the Party providing the information orally informs the Party receiving the information that the information is "confidential." Confidential Information shall be treated consistent with Section 18.17 of the Operating Agreement. A Party shall be responsible for the costs associated with affording confidential treatment to its information.

Article 14 – Regulatory Requirements

14.0 Regulatory Approvals.

Designated Entity shall seek and obtain all required government authority authorizations or approvals as soon as reasonably practicable, and by the milestone dates set forth in the Development Schedule of Schedule C of this Agreement, as applicable.

Article 15 – Representations and Warranties

15.0 General.

Designated Entity hereby represents, warrants and covenants as follows, with these representations, warranties, and covenants effective as to the Designated Entity during the full time this Agreement is effective:

15.0.1 Good Standing

Designated Entity is duly organized or formed, as applicable, validly existing and in good standing under the laws of its State of organization or formation, and is in good standing under the laws of the respective State(s) in which it is incorporated.

15.0.2 Authority

Designated Entity has the right, power and authority to enter into this Agreement, to become a Party thereto and to perform its obligations hereunder. This Agreement is a legal, valid and binding obligation of Designated Entity, enforceable against Designated Entity in accordance with its terms, except as the enforceability thereof may be limited by applicable bankruptcy, insolvency, reorganization or other similar laws affecting creditors' rights generally and by general equitable principles (regardless of whether enforceability is sought in a proceeding in equity or at law).

15.0.3 No Conflict.

The execution, delivery and performance of this Agreement does not violate or conflict with the organizational or formation documents, or bylaws or operating agreement, of Designated Entity, or any judgment, license, permit, order, material agreement or instrument applicable to or binding upon Designated Entity or any of its assets.

Article 16 – Operation of Project

16.0 Initial Operation.

The following requirements shall be satisfied prior to Initial Operation of the Project:

16.0.1 Execution of the Consolidated Transmission Owners Agreement

Designated Entity has executed the Consolidated Transmission Owners Agreement and is able to meet all requirements therein.

16.0.2 Execution of an Interconnection Agreement

Designated Entity has executed an Interconnection Agreement with the Transmission Owner(s) to whose facilities the Project will interconnect, or such agreement has been filed unexecuted with the Commission.

16.0.3 Operational Requirements

The Project must meet all applicable operational requirements described in the PJM Manuals.

16.0.4 Parallel Operation

Designated Entity shall have all necessary systems and personnel in place to allow for parallel operation of its facilities with the facilities of the Transmission Owner(s) to which the Project is interconnected consistent with the Interconnection Coordination Agreement associated with the Project.

16.0.5 Synchronization

Designated Entity shall have received any necessary authorization from Transmission Provider and the Transmission Owner(s) to whose facilities the Project will interconnect to synchronize with the Transmission System or to energize, as applicable, per the determination of Transmission Provider, the Project.

16.1 Partial Operation.

If the Project is to be completed in phases, the completed part of the Project may operate prior to completion and Required Project In-Service Date set forth in Schedule C of this Agreement, provided that: (i) Designated Entity has notified Transmission Provider of the successful completion of the Project phase; (ii) Transmission Provider has determined that partial operation of the Project will not negatively impact the reliability of the Transmission System; (iii) Designated Entity has demonstrated that the requirements for Initial Operation set forth in Section 16.0 of this Agreement have been met for the Project phase; and (iv) partial operation of the Project is consistent with Applicable Laws and Regulations, Applicable Reliability Standards, and Good Utility Practice.

Article 17 – Survival

17.0 Survival of Rights.

The rights and obligations of the Parties in this Agreement shall survive the termination, expiration, or cancellation of this Agreement to the extent necessary to provide for the determination and enforcement of said obligations arising from acts or events that occurred while this Agreement was in effect. The Liability and Indemnity provisions in Article 9 also shall survive termination, expiration, or cancellation of this Agreement.

Article 18 – Non-Standard Terms and Conditions

18.0 Schedule E – Addendum of Non-Standard Terms and Conditions.

Subject to FERC acceptance or approval, the Parties agree that the terms and conditions set forth in the attached Schedule E are hereby incorporated by reference, and made a part of, this Agreement. In the event of any conflict between a provision of Schedule E that FERC has accepted and any provision of the standard terms and conditions set forth in this Agreement that relates to the same subject matter, the pertinent provision of Schedule E shall control.

Article 19 – Miscellaneous

19.0 Notices.

Any notice or request made to or by any Party regarding this Agreement shall be made by U.S. mail or reputable overnight courier to the addresses set forth below:

Transmission Provider:
PJM Interconnection, L.L.C.
2750 Monroe Blvd.
Audubon, PA 19403
Attention: Senior Manager, Transmission Policy and Project Management

Designated Entity:
Transource Energy, LLC
1 Riverside Plaza,
Columbus, Ohio 43215-2372

Attention: Ryan L. Houk
rlhouk@aep.com

With copies to:
Jessica A. Cano
jacano@aep.com

Benjamin B. Leece
bleece@aep.com

Evan K. Dean
edean@aep.com

19.1 No Transmission Service.

This Agreement does not entitle the Designated Entity to take Transmission Service under the Tariff.

19.2 No Rights.

Neither this Agreement nor the construction or the financing of the Project entitles Designated Entity to any rights related to Customer-Funded Upgrades set forth in Subpart C of Part VI of the Tariff.

19.3 Standard of Review.

Future modifications to this Agreement by the Parties or the FERC shall be subject to the just and reasonable standard and the Parties shall not be required to demonstrate that such modifications

are required to meet the "public interest" standard of review as described in *United Gas Pipe Line Co. v. Mobile Gas Service Corp.*, 350 U.S. 332 (1956), and *Federal Power Commission v. Sierra Pacific Power Co.*, 350 U.S. 348 (1956).

19.4 No Partnership.

Notwithstanding any provision of this Agreement, the Parties do not intend to create hereby any joint venture, partnership, association taxable as a corporation, or other entity for the conduct of any business for profit.

19.5 Headings.

The Article and Section headings used in this Agreement are for convenience only and shall not affect the construction or interpretation of any of the provisions of this Agreement.

19.6 Interpretation.

Wherever the context may require, any noun or pronoun used herein shall include the corresponding masculine, feminine or neuter forms. The singular form of nouns, pronouns and verbs shall include the plural and vice versa.

19.7 Severability.

Each provision of this Agreement shall be considered severable and if for any reason any provision is determined by a court or regulatory authority of competent jurisdiction to be invalid, void or unenforceable, the remaining provisions of this Agreement shall continue in full force and effect and shall in no way be affected, impaired or invalidated, and such invalid, void or unenforceable provision shall be replaced with valid and enforceable provision or provisions which otherwise give effect to the original intent of the invalid, void or unenforceable provision.

19.8 Further Assurances.

Each Party hereby agrees that it shall hereafter execute and deliver such further instruments, provide all information and take or forbear such further acts and things as may be reasonably required or useful to carry out the intent and purpose of this Agreement and as are not inconsistent with the terms hereof.

19.9 Counterparts.

This Agreement may be executed in multiple counterparts to be construed as one effective as of the Effective Date.

19.10 Governing Law

This Agreement shall be governed under the Federal Power Act and Delaware law, as applicable.

19.11 Incorporation of Other Documents.

The Tariff, the Operating Agreement, and the Reliability Assurance Agreement, as they may be amended from time to time, are hereby incorporated herein and made a part hereof.

[Signature Page Follows]

IN WITNESS WHEREOF, the Parties have caused this Agreement to be executed by their respective authorized officials.

Transmis terconnection, L.L.C.

By: _____ Sr. Manager, TP&PM Apr 2, 2026

Na Title Date

Printed name of signer: Augustine Caven

Designated Entity: Transource Energy, LLC for itself and on behalf of Transource Maryland, LLC and Transource Pennsylvania, LLC

By: Signed by: David Stader D9A42BAF2B39451... _____ President 3/31/2026 | 3:56 PM EDT

Name Title Date

Printed name of signer: David Stader

SCHEDULE A

Description of Projects

PJM Baseline Upgrade ID	Description of Projects	Security
b2743.1	Tap the Conemaugh - Hunterstown 500 kV line & create new Rice 500 kV & 230 kV stations. Install two 500/230 kV transformers, operated together.	$3,197,780
b2743.5	Build new 230 kV double circuit line between Rice and Ringgold 230 kV, operated as a single circuit.	$3,595,212

SCHEDULE B

Scope of Work

PJM Baseline Upgrade ID	Scope of Work
b2743.1	Tap the Conemaugh - Hunterstown 500 kV line & create new Rice 500 kV & 230 kV stations. Install two 500/230 kV transformers, operated together.
b2743.5	Build new 230 kV double circuit line between Rice and Ringgold 230 kV, operated as a single circuit. The new Rice – Ringgold Line will include approximately 27 miles of double-circuit 230 kV alternating current overhead transmission line configured in a six-wired arrangement (operated as a single circuit), rated at least 1660 MVA summer normal and summer emergency, between the existing Ringgold Substation and the new Rice Substation.

SCHEDULE C

Development Schedule

Milestones				
PJM Baseline Upgrade ID	**Execute Interconnection Coordination Agreement:** On or before this date, Designated Entity must execute the Interconnection Coordination Agreement or request the agreement be filed unexecuted.	**Demonstrate Adequate Project Financing:** On or before this date, Designated Entity must demonstrate that adequate project financing has been secured. Project financing must be maintained for the term of this Agreement	**Acquisition of all necessary federal, state, county, and local site permits:** On or before this date, Designated Entity must demonstrate that all required federal, state, county and local site permits have been acquired.	**Required Project In-Service Date: On or before this date, Designated Entity must:** (i) demonstrate that the Project is completed in accordance with the Scope of Work in Schedules B of this Agreement; (ii) meets the criteria outlined in Schedule D of this Agreement; and (iii) is under Transmission Provider operational dispatch.
b2743.1	03/31/2027	03/31/2027	11/30/2027	01/19/2029
b2743.5	03/31/2027	03/31/2027	11/30/2027	01/19/2029

SCHEDULE D

PJM Planning Requirements and Criteria and Required Ratings

PJM Baseline Upgrade ID	Required Ratings	Planning Criteria
b2743.1	Rice Substation: • Two 900 MVA 500/230 kV transformers	Congestion Relief - Economic

b2743.5	Rice – Ringgold Line:
	• 1660 / 1660 MVA summer normal / emergency
	  ○ Two 230kV circuits each with the following parameters:
	  ▪ R = 0. 0025299 pu
	  ▪ X = 0. 0275589 pu
	  ▪ B = 0. 114035 pu
		Congestion Relief - Economic

SCHEDULE E

Non-Standard Terms and Conditions

I. Project Development

The Parties acknowledge and agree that Transource Energy, LLC may utilize its wholly owned subsidiaries, Transource Pennsylvania, LLC and Transource Maryland, LLC (the "Transource Subsidiaries"), to perform its obligations to design, engineer, procure, install, and construct the Project.

Transource Pennsylvania, LLC shall design, engineer, procure, install, construct, own, operate and maintain the portion of the Project to be located in the Commonwealth of Pennsylvania, and Transource Maryland, LLC shall design, engineer, procure, install, construct, own, operate, and maintain the portion of the Project to be located in the State of Maryland. Transource Energy, LLC shall provide the overall coordination for the Project work.

The Transource Subsidiaries shall obtain all necessary permits, siting, and other regulatory approvals to undertake their respective portions of the Project and shall perform their work in accordance with the terms of this Designated Entity Agreement.

In accordance with Sections 5.0, 16.0.1, and 16.0.2, of this Designated Entity Agreement:

(a) Transource Energy, LLC, Transource Pennsylvania, LLC and Transource Maryland, LLC shall each execute the Consolidated Transmission Owners Agreement;

(b) Transource Energy, LLC, Transource Pennsylvania, LLC and Transource Maryland, LLC shall each execute the Interconnection Coordination Agreement for the Project; and

(c) The Transource Subsidiaries each shall execute interconnection agreements with Transmission Owners with whom their respective facilities will interconnect.

II. ROE Cost Commitment

A. The "ROE Cost Commitment" is $210 million.

B. Consistent with the proposal submitted by Transource on February 27, 2015, and with the settlement approved by FERC on January 28, 2018 in Docket No. ER17-419, Transource commits to the following terms and conditions relevant to the Project:

(a) The Transource Subsidiaries shall be entitled to recover the FERC approved return on equity plus incentives on the costs incurred for the Project up to the ROE Cost Commitment;

(b) The Transource Subsidiaries shall be entitled to recover the FERC approved return on equity on the costs incurred for the Project above the ROE Cost Commitment, but shall forego any return on equity incentives approved by FERC (including the RTO participation adder) for the project cost portion that exceeds the ROE Cost Commitment; and

(c) The Transource Subsidiaries commit to cap the equity component of the capital structure for the competitive elements of the Project at 50% beginning on the earliest of (a) the Project's in-service date, (b) the date non-construction debt (i.e., permanent financing) is put in place, or (c) June 1, 2020.

C. Inclusion of the ROE Cost Commitment in this Designated Entity Agreement is not intended to preempt the right of any party to seek modifications to be ordered by FERC or otherwise challenge the recovery of costs through the FERC ratemaking process.

D. The Transource Subsidiaries shall notify PJM in writing within a reasonable time after they become aware of a condition that would result in (i) the ROE Cost Commitment being exceeded or (ii) triggering any exclusions to the ROE Cost Commitment. PJM, in turn, will communicate such information to stakeholders via notice posted on PJM's website and to FERC by written notice.

ATTACHMENT 4

Siting Study

9A WEST PROJECT

Rice-Ringgold 230 kV Transmission Line Project

Prepared for:
Transource PA, LLC and Transource MD, LLC
1 Riverside Plaza
Columbus, Ohio 43215



Prepared by:
AECOM
625 West Ridge Pike, Suite E-100
Conshohocken, Pennsylvania 19428



May 2026

TABLE OF CONTENTS

1.0 PROJECT OVERVIEW 1

1.1 Project Characteristics 2

1.1.1 Project Endpoints 2

1.1.2 Transmission Line, Substation Design, and ROW Requirements 3

1.2 Project Timeline and Overview of Regulatory Approvals 3

1.3 Goal of the Siting Study 5

2.0 ROUTE AND SITE DEVELOPMENT PROCESS 6

2.1 Route Development Process Summary/Methodology 6

2.2 Siting Team Members 7

2.3 Data Collection 8

2.3.1 Geographic Information System (GIS) Data Collection 8

2.3.2 Field Reviews 9

2.3.3 Federal, State and Local Government Coordination 9

2.4 Siting Guidelines 9

2.4.1 General Guidelines 9

2.4.2 Technical Guidelines 10

2.5 Public Involvement Process 11

2.5.1 Public Open House 11

2.5.2 Project Website and Virtual Open House 13

2.5.3 Consideration of Public Input 13

3.0 ALTERNATIVE ROUTE IDENTIFICATION 15

3.1 Substation Siting 15

3.2 Project Study Area Description 15

3.3 Constraints and Opportunities 18

3.4 Conceptual Route Development 18

3.5 Study Segments 19

3.5.1 Description of Study Segments 19

3.5.2 Study Segment Evaluation Process 19

3.5.3 Study Segment Development 20

3.5.4 Study Segment Analysis 22

3.6 Alternative Routes 29

3.6.1 Alternative Route A (30.2 miles) 29

3.6.2 Alternative Route B (31 miles) 31
3.6.3 Alternative Route C (27.9 miles) (the Proposed Route) 33

4.0 ALTERNATIVE ROUTE COMPARISON 38

4.1 Natural Resources 40
4.1.1 Soil and Water Resources 40
4.1.2 Wildlife Habitat and Sensitive Species 52
4.2 Land Use 59
4.2.1 Agricultural and Forestry Resources 59
4.2.2 Recreation and Conservation Lands 65
4.2.3 Developed Land Use 68
4.2.4 Historic and Archeological Resources 71
4.2.5 Scenic Resources 85
4.3 Constructability 92
4.3.1 Engineering Design Considerations 92
4.3.2 Topography 94
4.3.3 Access Roads 95

5.0 IDENTIFICATION OF THE PROPOSED ROUTE 100

5.1 Proposed Route Summary 100
5.2 Proposed Route Impacts and Mitigation 102
5.2.1 Land Use 102
5.2.2 Agriculture 102
5.2.3 Natural Features 102
5.2.4 Threatened and Endangered Species 104
5.2.5 Cultural Resources 104
5.2.6 Community Features and Conserved Lands 105
5.2.7 Anticipated Agency Requirements and Permits 105
5.2.8 Review of County Comprehensive Plans and Municipal Level Zoning 105

6.0 References 110

Tables

Table 1. Quantitative Routing Factors 38
Table 2. Pennsylvania Water Quality Designations 44
Table 3. Maryland Water Quality Designations 46
Table 4. Natural Areas within the Project Study Area - Pennsylvania 53
Table 5. Natural Resource Evaluation Criterion 57
Table 6a. NRHP-listed or eligible Historic Properties in the Project Study Area (PA) 71
Table 6b. Identified Archaeological Sites within the Archaeological Study Area (PA) 78
Table 7a. NRHP-listed or eligible Historic Properties in the Project Study Area (MD) 79
Table 7b. Identified Archaeological Sites within the Archaeological Study Area(MD) 81
Table 8. Land Use Evaluation Criteria 86
Table 9. Constructability Evaluation Criteria 96
Table 10. Summary of Zoning and Comprehensive Plans within the Project Study Area 109

Figures

Figure 1: Project Location Map 1
Figure 2: Typical 230 kV Double-Circuit Monopole Transmission Structure 3
Figure 3: Route Development Process Steps 7
Figure 4. Project Study Area 17
Figure 5. Study Segments 26
Figure 6a. Alternative Route Updates 27
Figure 6b. Proposed Chambersburg Area Middle School Arrangement 28
Figure 7. Alternative Routes 37
Figure 8a. Karst 42
Figure 8b. Prime Farmland 43
Figure 9a. Water Resources (PA) 48
Figure 9b. Water Resources (MD) 49
Figure 10. Threatened and Endangered Habitat 56
Figure 11. Land Use 63
Figure 12. Agricultural Easements 64
Figure 13. Parks/Forests/Trails 67
Figure 14. Cultural Resources 84
Figure 15. Proposed Route 99
Figure 16. Proposed Route 2-mile Overview ..... Appendix D

Appendices

Appendix A: GIS Data Sources

Appendix B: Agency Correspondence

Appendix C: Aerial Mapbook

Appendix D: Proposed Route 2-Mile Overview Drawing (Figure 16)

Key Terminology

Alternative Routes	A combination of Study Segments that form routes that connect the Project Endpoints and will be used for analysis and comparison
Conceptual Routes	Initial routes for the project that adhere to a series of general siting and technical guidelines
Constraints	Specific areas that should be avoided, to the extent reasonably practicable, during the route development and site selection process, recognizing that it is not possible to completely avoid all constraints
Distribution Line	An electric line that delivers power from a substation to households and businesses
Opportunity Feature	Areas where the transmission line may have less potential impacts to area land uses and the natural and human environment
Project Endpoint	The project starting and ending point(s), which may include substations, switch stations, tap points, or other locations defined by the Company's planners and engineers
Proposed Route	The alignment on which the applicant/Siting Team proposes to construct a transmission line.
Project Study Area	The territory in which line route alternatives can be sited to feasibly meet the Project's functional requirements
Siting Team	A multidisciplinary team of experts that includes engineers, siting specialists, natural resource specialists, construction managers, and right-of-way agents
Study Segments	Study Segments are partial alignments that when combined form a complete route
Substation	Substations are facilities that transform electric power from high to low, or the reverse, and is composed of an enclosed assemblage of equipment, e.g., switches, circuit breakers, buses, and transformers, through which electric energy is passed for the purpose of switching or modifying its characteristics
Transmission Line	Electric line that moves bulk electric power from a generating plant to a substation or between substations

ACRONYMS

ACEP	Agricultural Conservation Easement Program
amsl	Above Mean Sea Level
APE	Area of Potential Effect
ASA	Agricultural Security Areas
BG&E	Baltimore Gas and Electric
BLM	Bureau of Land Management
CFR	Code of Federal Regulation
COMAR	Code of Maryland Regulation
CWF	Cold Water Fishes
ESRI	Environmental Systems Research Institute
EU	Existing Use
EV	Exceptional Value
FAA	Federal Aviation Administration
FCALPB	Franklin County Agricultural Land Preservation
FCC	Franklin County Commissioners
FE	FirstEnergy
FEMA	Federal Emergency Management Agency
FRPP	Farm and Ranch Lands Protection Program
GIS	Geographic information system
GPS	Global positioning system
HQ	High Quality
HQ-CWF	High Quality-Cold Water Fishes
IBA	Important Bird Area
IEC Project	Independence Energy Connection Project
kV	Kilovolt
MALPF	Maryland Agricultural Land Preservation Foundation
MALPP	Maryland Agricultural Land Preservation Program
MF	Migratory Fishes
MDA	Maryland Department of Agriculture
MDE	Maryland Department of Environment
MDNR	Maryland Department of Natural Resources

MDPSC	Maryland Public Service Commission
MERLIN	Maryland Environmental Resource and Land Inform
MET	Maryland Environmental Trust
MHT	Maryland Historical Trust
MRLC	Multi-resolution land characteristics
MRLP	Maryland Rural Legacy Program
NAI	Natural Area Inventories
NAIP	National Agricultural Imagery Project
NCED	National Conservation Easement Database
NERC	North American Electric Reliability Corporation
NESC	National Electric Safety Code
NHD	National Hydrography Dataset
NLCD	National Land Cover Database
NPDES	National Pollutant Discharge Elimination System
NRCS	National Resources Conservation Service
NRHP	National Register of Historic Places
NWI	National Wetlands Inventory
NWPS	National Wilderness Preservation System
PADCNR	Pennsylvania Department of Conservation and Natural Resources
PADEP	Pennsylvania Department of Environmental Protection
PA-SHARE	Pennsylvania's Historic and Archaeological Resource Exchange
PAPUC	Pennsylvania Public Utility Commission
PDA	Pennsylvania Department of Agriculture
PEM	Palustrine Emergent
PFBC	Pennsylvania Fish and Boat Commission
PFO	Palustrine Forested
PGC	Pennsylvania Game Commission
PHMC	Pennsylvania Historic and Museum Commission
PJM	PJM Interconnection, LLC
POTC	Pennsylvania Ornithological Technical Committee
Project	9A West Project
PSS	Palustrine Scrub Shrub

ROW	Right-of-way
SHPO	State Historic Preservation Office
SR	State Route
SSPRA	Sensitive Species Project Review Area
SSURGO	Soil Survey Geographic Database
TEAs	Targeted Ecological Areas
TNC	The Nature Conservancy
T&E	Threatened and endangered (species)
Transource	Transource Energy
TSF	Trout Stocking
USACE	United States Army Corps of Engineers
USDA	United States Department of Agriculture
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
WMA	Wildlife Management Areas
WWF	Warm Water Fishes

1.0 PROJECT OVERVIEW

PJM Interconnection, LLC (PJM), the regional transmission operator, solicited proposals in 2014 to solve an electrical congestion issue on the grid. Numerous transmission providers proposed solutions to solve the problem, and PJM evaluated each proposal to determine the best solution. In March 2016, PJM selected Transource Energy's (Transource) proposal as the best solution to solve the problem. Transource's proposal, the Independence Energy Connection Project (IEC Project), consisted of a new 230 kilovolt (kV) transmission line, a new 500/230 kV substation, and several incumbent upgrades (Project). In 2016, Transource initiated the siting of the Rice-Ringgold 230 kV Transmission Line (**IEC West Project**), which begins in Franklin County, Pennsylvania at Transource's proposed new Rice Substation and terminates at the existing Ringgold Substation in Washington County, Maryland **(Figure 1)**. A Siting Study conducted in 2017 resulted in the identification of three alternative routes, of which Alternative Route C was considered by Transource to be the Proposed Route due to its reduced impact on the communities and natural environment. In 2017, the Siting Application for the IEC West Project, which included the 2017 Siting Study, was submitted to the Pennsylvania Public Utility Commission (PAPUC), however subsequently the project was placed on hold by PJM as they re-evaluated the need.

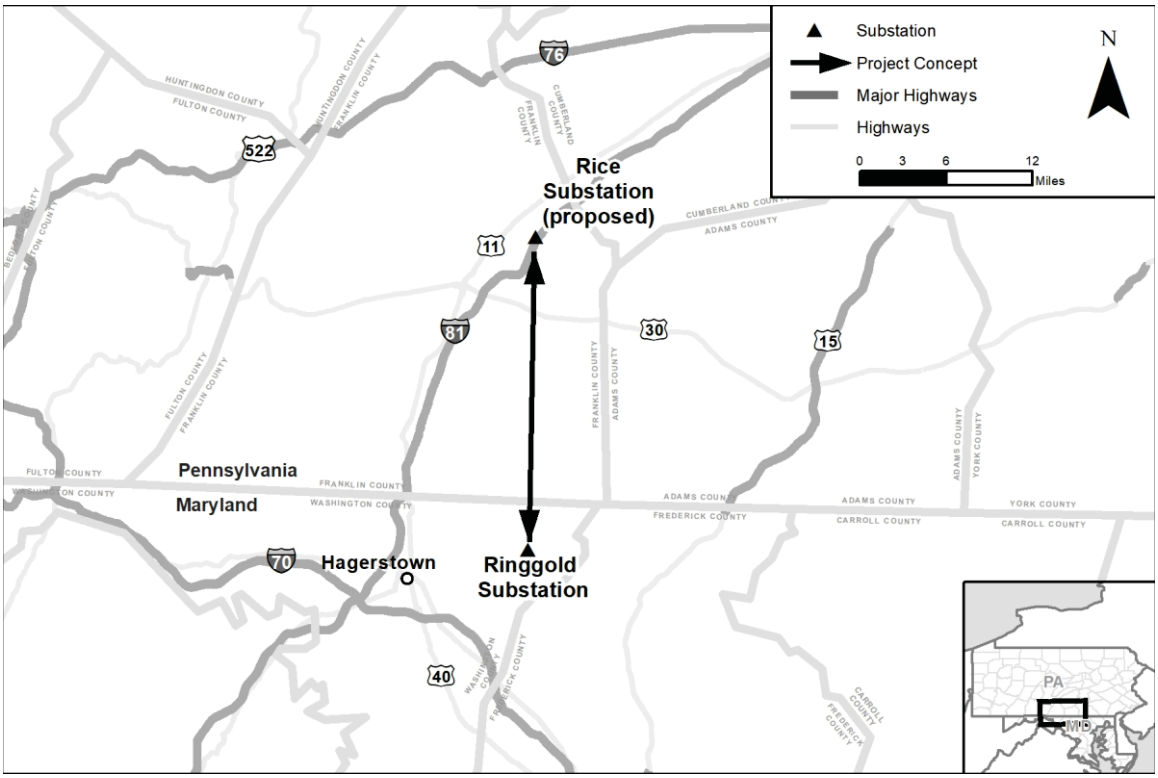


Figure 1: Project Location Map

In 2025, PJM reaffirmed the need for the Rice-Ringgold 230 kV Transmission Line, which was renamed to the 9A West Project (Project), and Transource's role in completing the project. With the renewal of this portion of the original project, the initial step for Transource was to re-evaluate the 2017 Siting Study to reflect current conditions applicable to the 9A West Project and update the siting study. This process involved conducting field reviews to reassess the Project Study Area, as described further below, updating the metrics analysis process to account for amended data sources, and updating the 2017 Siting Study to address the changes in the landscape and the data. The field reviews confirmed the need for modifying one of the alternative route options (Alternative Route A) due to new residential development and that the other alternatives, including the Proposed Route, were still viable alternatives. 2026 field reviews and evaluation of the revised metrics supported the 2017 Siting Study conclusion to select Alternative Route C as the Proposed Route for the current 9A West Project.

The following report retains most of the text and siting logic of the 2017 Siting Study but has been updated to reflect the new name (**9A West Project**), current field conditions, use of new or modified data sources, and a few new conclusions based on the new data sources. Specific sections of the report, such as the Project Timeline and Overview of Regulatory Approvals (Section 1.2) and Public Involvement Process (Section 2.5), retain details of the IEC West Project process as well as the more current 9A West Project process to provide cohesiveness for the Rice-Ringgold 230 kV Transmission Line Project.

1.1 Project Characteristics

1.1.1 Project Endpoints

The 9A West Project involves the development of an approximate 25 to 30 mile long 230 kV double-circuit overhead electric transmission line. The northern extent of the 9A West Project will tap into First Energy's (FE) Hunterstown-Conemaugh 500 kV transmission line via two new 500 kV transmission lines, approximately 1.5 mile in length, to be constructed by FE. These two new 500 kV transmission lines will supply power to the proposed Rice Substation to be owned and operated by Transource. Based on modifications made in 2026 as discussed below, the Rice 500/230 kV Substation will be located between Rice Road and Interstate-81 (I-81) situated due west of the interstate in Greene Township, Franklin County, Pennsylvania. The southern extent of the Project will terminate into the existing FE Ringgold 230/138 kV Substation located near Smithsburg in Washington County, Maryland. The identification of the location of the proposed Rice 500/230 kV Substation is further detailed in Section 3.0.

1.1.2 Transmission Line, Substation Design, and ROW Requirements

The 9A West Project requires new right-of-way (ROW) with a typical width of 130 feet **(Figure 2)**. Proposed structures vary in height, footprint, and type depending on location. However, the 9A West Project will generally be constructed using galvanized steel double-circuit monopoles. The average height for the galvanized steel double-circuit structures is approximately 130 feet **(Figure 2)**. Typical span lengths can range from approximately 800 feet; however, actual span lengths will vary depending on the location.

The Rice 500/230 kV Substation will require approximately 33 acres to accommodate the substation facility, fencing, grading, and stormwater features. The 9A West Project will also require upgrades to the Ringgold 230/138 kV Substation. The Ringgold Substation will be expanded by FE to accommodate the construction of additional bays.

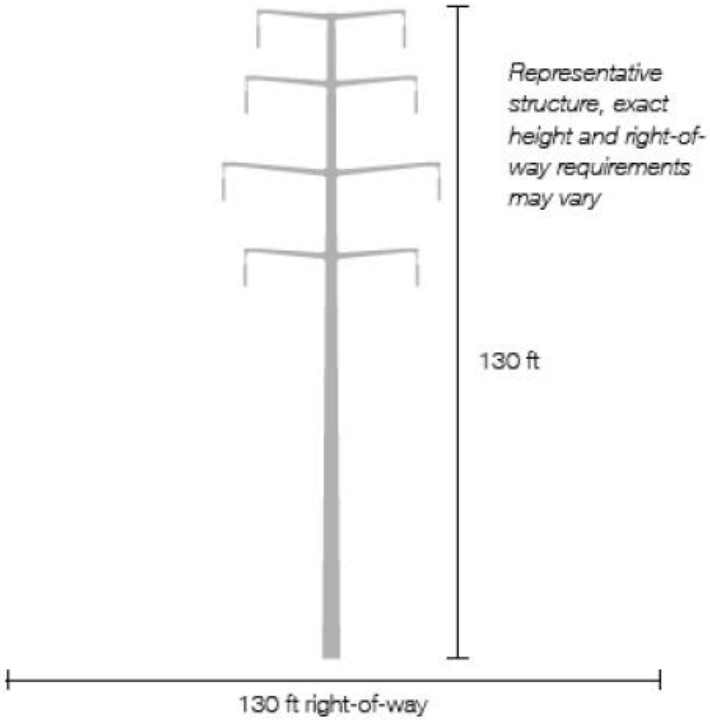


Figure 2: Typical 230 kV Double-Circuit Monopole Transmission Structure

1.2 Project Timeline and Overview of Regulatory Approvals

PJM identified the need for the project in 2014, and selected Transource's proposed solution in March of 2016. Transource contracted AECOM to assist with siting the IEC West Project in August of 2016. The Siting Team initiated the transmission line siting process in the fall of 2016 with the identification and collection of relevant publicly available data. Federal and State agencies were contacted in January of 2017 to introduce the Project and obtain feedback and data. In addition,

initial meetings were held with agencies, townships, counties, and elected officials to introduce the Project and discuss potential constraints in the area.

Initial Study Segments were developed in early 2017 followed by field reviews of the Project Study Area to verify land use and modify Study Segments accordingly. The Study Segments were continually revised during this time as new data was collected from public sources, engineering input, agency coordination efforts, and field reviews.

The resultant network of Study Segments was presented at a series of public open houses in June 2017. The Study Segments were then re-evaluated based on public input, additional engineering review, and existing constraints and either further refined or eliminated from further consideration. The Revised Study Segments were then presented to the public during a second round of open houses conducted in August 2017 to obtain further feedback. Following the second round of public open houses, the Revised Study Segments were again modified as necessary and compiled into three complete Alternative Routes for analysis and comparison. The Proposed Route was identified through the analysis and comparison of these Alternative Routes.

The initial Siting Study was prepared during the fall of 2017 to support Transource's application to the Maryland Public Service Commission (MDPSC) and the PAPUC for approval to construct the Proposed Route. The Siting Study describes the process used, information gathered, and analysis conducted to identify the Proposed Routes for the IEC West Project. Concurrent with the MDPSC and PAPUC review process, other relevant state and federal permit applications were prepared and submitted in 2018 to those regulatory agencies that will oversee the construction and permitting of the Project. Pending approval from the MDPSC, PAPUC, and other relevant regulatory agencies, construction of the Project was expected to begin in 2019 with an in-service date of June 2020.

With the placement of the Project on hold and then the recent reaffirmation by PJM, the timeline has required modification for the new 9A West Project. Review of the Project Study Area was conducted in November 2025 to reassess the alignments of the three Alternative Routes, which confirmed that land use changes along Alternative Route A would require adjustments to this route, but that the other alternatives, including the Proposed Route, were still viable alternatives. In addition, new public open houses were conducted in March 2026 to obtain landowner and community feedback on the alternative routes. Submission of the updated Siting Application to the PAPUC is planned for May 2026 (the Maryland portion of the Project was approved by the MDPSC in 2018). Concurrent with the PAPUC review process, other relevant state and federal permit applications are being prepared and finalized for submission later in 2026 to those regulatory agencies that will oversee the construction and permitting of the Project. Pending approval from the PAPUC, and other relevant regulatory agencies, construction of the Project is expected to begin in early 2027 with an in-service date of January 19, 2029.

1.3 Goal of the Siting Study

The goal of the Siting Study is to identify and evaluate opportunities and constraints in the Project Study Area to facilitate the development of several Alternative Routes, evaluate potential impacts associated with these Alternative Routes, and identify a Proposed Route to be constructed to meet the Project need. The Proposed Route is the route that (1) reasonably minimizes adverse impacts on area land uses and the natural and cultural environment; (2) minimizes special engineering design requirements and unreasonable costs; and (3) can be constructed and operated in a timely, safe, and reliable manner.

2.0 ROUTE AND SITE DEVELOPMENT PROCESS

2.1 Route Development Process Summary/Methodology

The route development process is inherently iterative with modifications made throughout the siting analysis as a result of the identification of new constraints, input from agencies, landowners, and other stakeholders, periodic reassessment of routes with respect to the siting criteria, and adjustments to the overall route network. As a result of the evolving nature of the route development process, the Siting Team **(**see **Section 2.2)** uses specific vocabulary to describe the routes at different stages of development.

Initial route development efforts start with the identification of large area constraints and opportunity features within the **Study Area**, which encompasses the endpoints of the Project and areas in between **(Figure 3, Step 1)**. These areas are typically identified using a combination of readily available public data sources.

The Siting Team uses this information to first develop an array of **Conceptual Routes** for the Project adhering to a series of general siting and technical guidelines **(Step 2)**. Where two or more of these Conceptual Routes intersect, **Study Segments** are formed between two common nodes or points of intersection. Together, the assemblage of Study Segments is referred to as the **Study Segment Network (Step 3)**.

As the route development process progresses, the Siting Team continues to evaluate new data and modifies, if necessary, the Study Segments included in the network to develop a **Refined Study Segment Network (Step 4)**. Eventually, complete **Alternative Routes** are developed by assembling the Study Segments that best meet the siting guidelines into individual routes for analysis **(Step 5)**. Alternative Routes are assessed and compared with land uses, natural and cultural resources, and engineering and construction concerns. Ultimately, through a quantitative and qualitative analysis and comparison of the Alternate Routes, the Siting Team identifies a **Proposed Route (Step 6)** for submission to the MDPSC and PAPUC.

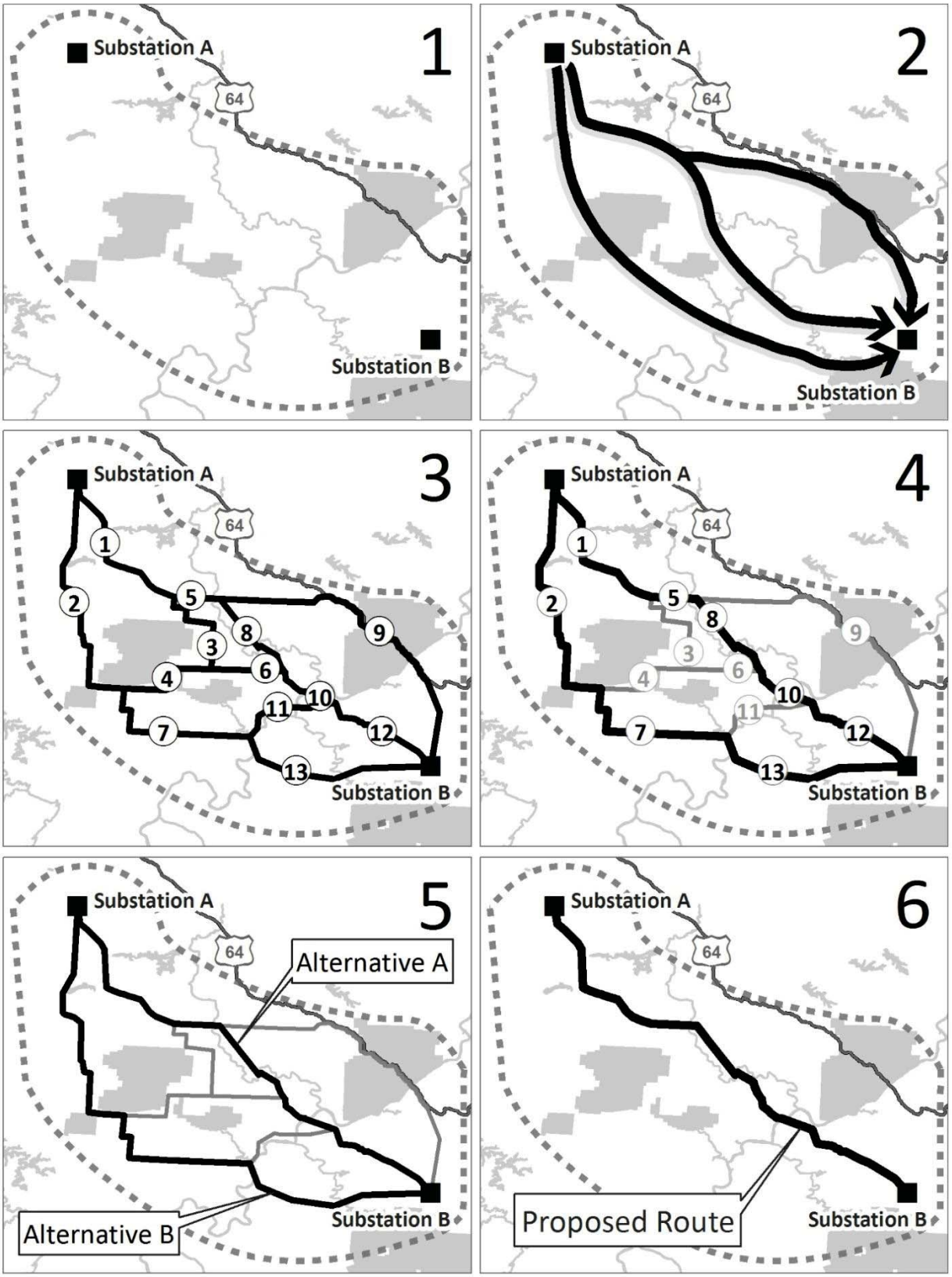


Figure 3: Route Development Process Steps

The above figure is for illustrative purposes and does not reflect the actual study segments or alternative routes developed for the IEC West Project or the 9A West Project.

A multi-disciplinary Siting Team was engaged throughout the siting process for the IEC West and 9A West Projects. Team members were selected to bring a wide variety of experience to achieve a thorough review of all aspects of developing the Proposed Route. Members of the Siting Team have experience in transmission line siting, impact assessment for a wide variety of natural resources, cultural resources, and area land use types, as well as impact mitigation, transmission engineering and design, right-of-way acquisition, and construction.

The team worked together during the Siting Study to define the Project Study Area, develop siting criteria, identify siting constraints and opportunities, collect and analyze environmental and design data, solicit public input, consult with natural resource and permitting agencies, develop and revise the study segments, and analyze and report on the selection of a Proposed Route.

2.3 Data Collection

The following sources of information were used to develop data for the Siting Study. A detailed table of data sources is provided in **Appendix A**.

2.3.1 Geographic Information System (GIS) Data Collection

Aerial photography is an important tool in the siting process. The primary sources of aerial imagery used in the route identification, analysis, and selection effort for the Project include Maryland National Agricultural Imagery Program (NAIP) (2023) and Pennsylvania NAIP (2022), but also included review of on-line imagery provided by Google Earth, Bing Maps, United States Fish and Wildlife Service (USFWS) Wetland Mapper, Pennsylvania Department of Environmental Protection's (PADEP) EMapPA, and Maryland's Environmental Resource and Land Inform (MERLIN). Similar imagery was used in 2026 to reassess the alternative routes.

Updated information, such as the location of new residences and other constraints, was annotated to the photography by either paper maps (at the public meetings) that were transferred into the GIS or digitized directly into the GIS as identified during field inspections. Existing paper and electronic maps were also examined as part of the siting process. These include U.S. Geological Survey (USGS) Geological Survey 7 ½ minute topographic quadrangle maps and state and county road maps in digital form.

The siting process made extensive use of information in existing GIS data sets that were obtained from many sources, including federal, state, and local governments. This information was obtained through official agency GIS data access websites, provided directly by government agencies, and created by the Siting Team by digitizing information from paper-based maps, aerial photo interpretation, interviews with stakeholders, public input, and field inspections. These data sets were updated in 2026, where appropriate or required, and used to update the metrics assessment conducted for the Project.

Appendix A presents a list of the GIS data sources used for this study. Field reconnaissance was conducted to verify certain features (e.g., locations of residential, commercial and industrial buildings).

2.3.2 Field Reviews

Siting Team members conducted multiple field reviews across the Project Study Area. Prior to these reviews, field maps were generated that consisted of key siting features such as residences, parcel lines, places of worship, cemeteries, and natural resources (e.g., wetlands, streams, and floodplains). During these field reviews, team members confirmed the general land uses and evaluated the specific Study Segments by automobile from public roads and other points of public access. Field-verified features were added to the GIS database using laptops/tablets running GIS software supported by real-time Global Positioning System (GPS). This information, in conjunction with the public input, was used in the siting process to assist in the comparison of Study Segments and to create mapping to depict the opportunities and constraints. The 2026 field review was conducted in a similar format with a focus on reaffirming the land uses and features identified in 2017.

2.3.3 Federal, State and Local Government Coordination

The Siting Team initiated agency consultation in early 2017 by mailing letters to various federal, state, and local agencies and/or officials to inform them of the IEC West Project and request data for the Siting Study. In addition, the Siting Team held numerous meetings with agencies, counties, townships, and officials during the siting process. A summary of the agencies contacted, and a listing of meetings held, as well as copies of agency correspondence, are included as **Appendix B**. Transource will work with all applicable agencies and obtain all required jurisdictional permits and approvals and comply with any conditions tied to these approvals.

2.4 Siting Guidelines

2.4.1 General Guidelines

The primary goal for this siting effort was to identify a Proposed Route for the Project that (1) reasonably minimizes adverse impacts on area land uses and the natural and cultural environment; (2) minimizes special engineering design requirements and unreasonable costs; and (3) can be constructed and operated in a timely, safe and reliable manner.

The following guidelines that represent good siting principals were considered for this effort, where reasonable and practicable:

- Consider parallel alignments along existing utility ROWs or other infrastructure, such as roadways and railroads.

- Maximize the distance from residential dwellings, schools, daycare facilities, hospitals, and other community facilities.
- Consider stakeholder input.
- Minimize visibility from federal and state listed scenic roadways and designated scenic resources.
- Minimize conflict with designated public resource lands, recreation lands, nature preserves, or other conservation areas.
- Minimize conflict with existing and approved future development and land uses.
- Minimize potential environmental and land use impacts by avoiding circuitous routes.
- Minimize new crossings of large wetland complexes, critical habitat, and other unique or distinct natural resources.
- Minimize habitat fragmentation and impacts on designated areas of biodiversity concern.
- Avoid crossing hazardous waste sites or sites with active mineral extraction activities.
- One of the Alternative Routes should be less than 20% coincident with the Proposed Route.

2.4.2 Technical Guidelines

Technical guidelines are driven by the physical characteristics and engineering limitations of the structures and lines themselves, and the design criteria necessary to meet Transource design standards, North American Electric Reliability Corporation (NERC) reliability standards, National Electric Safety Code (NESC), and industry best practices for construction. The technical guidelines were informed by (1) the technical expertise of engineers and other industry professionals responsible for the reliable, safe and economical construction, operation, and maintenance of electric system facilities, (2) NERC reliability standards as implemented by PJM, and (3) industry best practices.

The Siting Team considered the following technical guidelines during the siting process:

- Maintain a minimum of 115 feet of centerline-to-centerline separation when paralleling 138 kV or lower voltage transmission lines.
- Minimize crossings of existing transmission lines.
- Minimize crossing existing interstate and multi-lane highways and cross perpendicular, where feasible.
- Limit transmission line angles greater than 30 degrees.

- Limit areas across steep slopes (more than 20 percent slopes for angle structures and more than 30 percent slopes for tangent structures).

2.5 Public Involvement Process

Public Open House

The following details the public open houses completed to date on both the original IEC West Project and the current 9A West Project.

For both Projects, the open houses were set up with an open format where the public could attend at any time during the hours planned. Attendee were greeted by a Transource representative and given a guided tour through various boards that described Transource, the purpose and need of the Project, engineering considerations, the right-of-way process, and the siting process. After the guided tour, members of the Siting Team were available with large format maps, printed at a scale of 1 inch = 500 feet, to review individual properties and take comments. All attendees were given comment cards with unique identifying numbers. These numbers were noted on maps for the parcel(s) of each landowner. Attendees were encouraged to identify the location of their residences, places of business, property of concern, or other sensitive resources on the printed maps. After the public open house, handwritten comments from the maps were digitized and entered into a GIS database. In addition, all comment cards were entered into a database with the unique identifier so the comment and the parcel could easily be correlated.

<u>9A West Project Open Houses:</u>

Open houses for the 9A West Project were conducted on March 16 and March 17, 2026 from 4pm-7pm. The first open house was held at the Green Grove Gardens Event Center in Greencastle, Pennsylvania with the second open house being held at Hager Hall in Hagerstown, Maryland. These open houses followed a open format where the public could attend at any time during the scheduled hours for each open house. Attendees were also given comment cards with unique identifying numbers and were encouraged to identify the location of their residences, places of business, property of concern, or other sensitive resources on the printed maps.

A total of 85 people signed in at the March 16th first open house and a total of 17 people signed in at the March 17th open house, with a total of 55 open house comments received. Additional comments, totaling 27, were also received via mail.

<u>IEC West Project Open Houses</u>

Transource conducted two rounds of public open houses during different phases of the IEC West siting process to inform the public about the project and obtain information from landowners

about their properties. The first round of open houses focused on a wide network of Study Segments with the goal to obtain information from the public to help modify, eliminate or add Study Segments. Following the first round of open houses and subsequent qualitative and quantitative analysis, the second round of open houses focused on a refined set of Study Segments. The dates of the IEC West Project open houses are listed below.

First Round of Open Houses:

1. June 12, 2017 from 6pm-9pm at the Smithsburg High School in Smithsburg, Washington County, Maryland;
2. June 13, 2017 from 6pm-9pm at the Eugene C. Clarke Jr. Community Center in Chambersburg, Franklin County, Pennsylvania;
3. June 14, 2017 from 6pm-9pm at the Waynesboro Area Senior High School in Waynesboro, Franklin County, Pennsylvania; and
4. June 15, 2017 from 6pm-9pm at the Kauffman Ruritan Club and Community Center in Chambersburg, Franklin County, Pennsylvania.

Second Round of Open Houses:

1. August 7, 2017 from 6pm-9pm at the Smithsburg Middle School in Smithsburg, Washington County, Maryland; and
2. August 8, 2017 from 6pm-9pm at the Kauffman Ruritan Club and Community Center in Chambersburg, Franklin County, Pennsylvania.

The public and property owners were notified about the time and location of the open house meetings through the following means:

1. Letters to property owners within 500 feet of the Study Segments,
2. Automated phone calls to residences within 500 feet of the Study Segments,
3. Reminder postcards sent to these residences,
4. Newspaper notification placed in the Chambersburg Public Opinion, Waynesboro Record and Herald Mail Media, and
5. A Project specific web site http://beta.power-viz.com/transourceenergyprojects/IndependenceEnergyConnection/, which was included in media venues and in letters to residents. Note, this Website has since been closed and replaced with the updated 9A West Project site described above.

A total of 238 people signed in at the first round of open houses and 343 people signed in at the second round of open houses for the Rice-Ringgold portion of the Project.

2.5.1 Project Website and Virtual Open House

Transource also established an IEC West Project website which was updated throughout the various phases of the siting process. The website provided access to a google-earth style aerial map where interested parties could zoom to a particular area of the IEC West Project and review Study Segments (after the first round of open houses) or refined Study Segments (after the second round of open houses). In addition to reviewing the potential alignments of the Study Segments, landowners and members of the general public could submit comments or add points to the map to provide specific information about resources or structures on their property. These points were integrated into the GIS database and were reviewed as part of the siting process.

The IEC West Project website also offered the public the ability to virtually review the printed materials presented at the open houses such as the explanatory boards and the large format maps. Transource monitored the comments provided through the website and provided answers to questions from the public. Over the course of the Project, over 428 comments were received through this venue. For individuals without access to the internet, paper maps were mailed, upon request.

A similar and more recent website was established for the 9A West Project that can be found at Rice - Ringgold Transmission Line Project. This website contains the current project description, virtual open house materials, a mapper tool with the updated routes, and the ability to leave an online comment.

2.5.2 Consideration of Public Input

As a result of the March 2026 open house events, and notification efforts completed to date via landowner letters and newspaper notices, the 9A West Project has received a total of 84 new comments. These comments were received from either the open house event, mailed in comments, or comments left via the Project website.

In 2017, in addition to the 211 comment cards submitted regarding the Project at the two sets of public open houses and the 428 comments received via the website, Transource also received an additional 442 comments on the Project through phone calls, emails, and letters and postcards received via U.S. mail. All of the comments were entered into the IEC West Project database and categorized based on the topics addressed such as aesthetics, vegetation clearing, structure type, or land use. Data from all of these input sources (e.g., open houses, comment cards, website) were used to evaluate the Study Segments after each open house and assisted in the decision-making process toward identifying a Proposed Route.

In both 2017 and 2026, Transource PA met with local governmental officials and stakeholders to inform them about the Project, answer questions, and collect input concerning the three routes. This information was considered to adjust routes as practicable. See Section 3.5.5 which describes 2026 route modifications based largely on stakeholder input.

3.0 ALTERNATIVE ROUTE IDENTIFICATION

3.1 Substation Siting

In conjunction with the transmission line siting process, multiple locations for the proposed Rice 500/230 kV Substation were also evaluated in 2017 in Franklin County, Pennsylvania. The Rice Substation will be connected to FE's Hunterstown-Conemaugh 500 kV transmission line and will be the northern-most endpoint of the 9A West Project. Locations in close proximity to the FE Hunterstown–Conemaugh 500 kV transmission line were considered more favorable than sites further from this existing transmission line. Being in close proximity to the existing 500 kV system will reduce the length of 500 kV tap lines that will need to be constructed to the Rice Substation. Other key considerations for siting the new substation included accessibility from adjacent established roadways, a large enough parcel to accommodate the substation and ancillary design features, generally level grade, a lack of environmental or agricultural conservation land, favorable soil conditions for foundations, and ability to acquire the property. Due to relative close proximity of the two substation sites that were ultimately identified, evaluation of the substation options had limited effect on defining the Project Study Area or developing Study Segments. Ultimately, in 2017 the proposed Rice Substation site, which was located on the east side of Interstate-81 near SR 696, was determined based on the design requirements of the substation as well as assessment of the Study Segments to that particular location.

Field, survey, and engineering reviews conducted in 2025 at the proposed Rice Substation site determined significant karst formations present under the property and as a result alternative sites were reviewed by Transource PA in an effort to avoid or minimize geotechnical issues. The new location for the Rice Substation, which is adjacent and on the west side of Interstate-81 near Rice Road, was identified in 2026 and is approximately 1.35 miles south of the Hunterstown–Conemaugh 500 kV transmission line. The new site is composed of a level agricultural field, easily accessible from the local road system, and avoids significant karst features. This adjustment required a minor realignment of the alternative routes to terminate further south and west of I-81. This adjustment did not fundamentally change the Project Study Area description, Study Segment Identification, and other aspects of the analysis discussed in the following sections.

3.2 Project Study Area Description

The Project Study Area is the territory in which Study Segments can be reasonably developed to meet the Project's functional requirements and, at the same time, minimize environmental impacts and Project costs. The boundaries of the Project Study Area were determined by the geographic area encompassing the proposed Rice Substation and existing Ringgold Substation and was intended to incorporate all reasonable Conceptual Routes between these connection points. Given these considerations, the Siting Team identified a Project Study Area encompassing approximately 305-square miles that included portions of central and southern Franklin County

in Pennsylvania and the northeast portion of Washington County in Maryland **(Figure 4)**. The Project Study Area is generally bounded by:

- The FE's Hunterstown-Conemaugh 500 kV transmission line to the north,
- Michaux State Forest and the towns of Mont Alto and Waynesboro, Pennsylvania to the east,
- The town of Smithsburg , Maryland to the south,
- The Hagerstown Regional Airport, the town of Greencastle, Pennsylvania, and the Letterkenny Army Depot to the west.

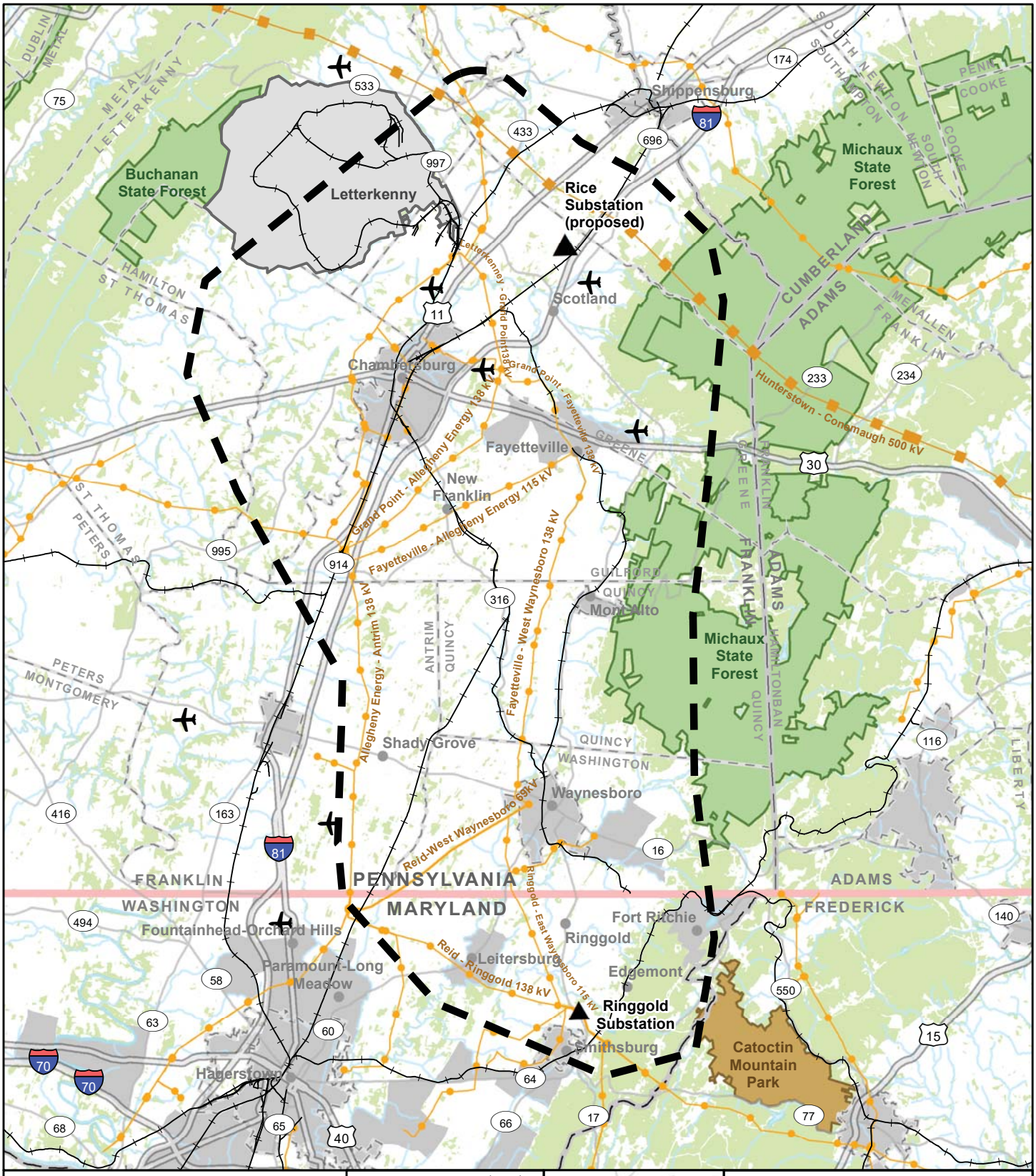


Figure 4
Project Study Area

Rice - Ringgold 230kV Transmission Line Project

TRANSOURCE

3.3 Constraints and Opportunities

One of the first steps in the process is for the Siting Team to define the major siting opportunities and constraints in the Project Study Area. *Constraints* are specific areas that should be considered, and where possible avoided, to the extent practicable during the route development and selection process. Siting *opportunities*, or 'opportunity features', include other existing linear infrastructure and utility corridors, such as existing electric transmission networks, railroad corridors, and roads, that may reduce the overall impact of the line on area land uses (**Figure 4)**. Opportunity features may also include non-linear features such as reclaimed mine lands or unused portions of industrial or commercial areas.

Alignments developed along opportunity features may lessen the overall impact of the new line. For example, siting a new transmission line next to an existing one typically can reduce the overall visual impact of the new line when compared to a non-parallel or 'greenfield' alignment. Paralleling a road right-of-way may reduce the fragmentation impacts of a new right-of-way cut through a heavily forested area. However, the benefits of these opportunity features have to be considered with respect to area land use and other associated effects. For example, if a parallel alignment requires frequent crossing of the existing line to avoid adjacent constraints, then additional aesthetic impacts from many tall crossing structures would need to be considered, as well as the potential for operational and construction impacts associated with outage planning, construction, and maintenance activities. Similarly, while paralleling roads may reduce fragmentation impacts in a heavily forested area, it may also place the line in closer proximity to houses along the road.

During the conceptual siting process, the Siting Team initially identifies a range of both large area and smaller site specific constraints. Large area constraints may include densely populated residential areas, federal and state parks, airports, and mining operations. As the Siting Team develops specific siting alignments, smaller scale constraints are identified and avoided, where feasible. Examples of these more local constraints include individual homes, schools, recreational trails, and radio towers. The effect of these large and small scale constraints on routing options will vary based on the potential opportunities identified across the Project Study Area.

3.4 Conceptual Route Development

Working with the opportunities and constraints identified, and within the general and technical siting guidelines, the next step is developing potential Conceptual Routes, which are routes developed at a high level to avoid large area constraints or incorporate notable opportunity features in the Project Study Area.

Specific Conceptual Routes identified in the Project Study Area included paralleling Interstate-81 (I-81), regional railroad alignments (e.g., CSX Lurgan Subdivision), local utility corridors such as

the Fayetteville-West Waynesboro 138 kV line, as well as traversing the forested slopes of South Mountain. Constraints primarily consisted of Michaux State Forest, Caledonia State Park, the Letterkenny Army Depot (located northwest of Chambersburg), and densely developed areas such as Waynesboro and Chambersburg. In addition, identifying a suitable crossing location of U.S. Route 30 was a key constraint in the Project Study Area as a result of the dense commercial/retail and residential development along and fringing this corridor.

3.5 Study Segments

3.5.1 Description of Study Segments

The Siting Team developed a series of Study Segments based on the conceptual route guidelines presented in **Section 2.0**. Study Segments are partial alignments developed based on the routing concepts **(**see **Figure 3)**. As the siting effort evolved through the field review and open house phases, Study Segments were modified, removed, or added. These eliminations or adjustments were based on the likelihood of impacts on residential or commercial areas, agricultural operations, planned and future development, and sensitive environmental areas. **Figure 5** shows the resulting network of Study Segments evaluated by the Siting Team.

3.5.2 Study Segment Evaluation Process

To evaluate and compare Study Segments, a table of factors was developed which focused on the potential impacts of the Project to the human/built environment, the natural environment, and engineering considerations. Examples of the human/built environment include factors such as proximity to residences schools, or historic and cultural resources. The natural environment includes factors such as number of stream crossings or acres of forest clearing. Comparative factors for engineering include the number of transmission line crossings or sharp transmission line turns (greater than 30 degrees). The quantitative routing factors assessed are listed and defined in **Table 1** in **Section 4.0** where these factors are further discussed.

To compare Study Segments, the Siting Team initiated an iterative side-by-side comparison of specific segments or group of segments that could connect particular points across the landscape. Relevant assessment factors for each of these comparative reviews varied across the Project Study Area as a result of the changing land use and topography. Throughout the Study Segment evaluation process, the entire collection of human/built, environmental, and engineering factors were considered together. The evaluation included both a quantitative and qualitative assessment recognizing that minimizing impacts to one constraint factor may increase impacts to others. The analysis sought to identify Study Segments that represent a best balance in reducing potential impacts across all of these factors.

The comparative analysis and public input allowed the Siting Team to identify Study Segments that minimized potential impacts as compared to other Study Segments that serve the same purpose and function. In scenarios where the impacts would be significantly different, the Study Segment(s) with the greatest potential impacts were eliminated. In scenarios where the difference was less pronounced, all Study Segments were retained until they could be reviewed in the larger context, which was accomplished through combining several Study Segments that connect similar points.

3.5.3 Study Segment Development

At the onset of the Study Segment development phase, the specific location of the Rice Substation was unknown. The Siting Team identified and optioned two potential substation locations approximately one mile apart along the FE Hunterstown-Conemaugh 500 kV transmission line. Given the close proximity of the sites, Study Segment options were very similar and only varied close to the potential substations. Identifying opportunity corridors and developing Study Segments heading south to the Ringgold Substation were minimally affected by the substation review process.

A key factor to the Study Segment development process was the limited opportunities to cross U.S. Route 30, which is a highly developed-east-west corridor that bisects the Project Study Area. From the eastern boundary of the Project Study Area, this highway extends west from the forested slopes of South Mountain, most of which is protected as part of Michaux State Forest, through the dense development around Fayetteville, Guilford, and Chambersburg, and then out to the less developed western boundary. Four potential crossing locations were identified to cross the highway, with one being close to South Mountain, two being located in commercial areas between Fayetteville and Chambersburg, and the fourth being west of Chambersburg. Crossing U.S. Route 30 at these four areas resulted in Study Segment development that funneled to these specific locations, and in many cases, resulted in Study Segment development close to several constraints areas. Specifically, the eastern crossing of U.S. Route 30 resulted in Study Segments across the edge of South Mountain and across one section of Michaux State Forest; the central options resulted in Study Segments in developed areas along I-81 that included a private airport, local schools, dense residential neighborhoods, and commercially evolving properties; and the western option resulted in Study Segments toward the Franklin County Regional Airport and the extensive Letterkenny Army Depot and the surrounding commercial development.

Opportunity corridors identified in the Project Study Area included roads (i.e., I-81 and U.S. Route 11), railroads, (such as the Norfolk Southern railroad line that parallels I-81 and several other local rail lines), as well as a number of transmission line corridors (most of which have a generally north-south alignment). Opportunities to use the undeveloped lands along South Mountain were also evaluated. Development of the Study Segments initially focused on any potential conceptual

alignments that could parallel these existing infrastructure features or use areas of undeveloped land.

Study Segments were developed parallel to I-81 north of Chambersburg where agricultural lands were located adjacent to the highway, however, concentrated development near Scotland and Chambersburg resulted in several alignment shifts away from the highway edge. Opportunities to parallel I-81 south of Chambersburg were also limited due to adjacent development and because the highway continues to travel further to the southwest and away from the Ringgold Substation area. Assessment of U.S. Route 11 noted no paralleling opportunity due to the variable residential and commercial development along this roadway.

Similar to I-81, the Norfolk Southern railroad offered a few opportunities north of Chambersburg where short Study Segments could be developed, however, the dense development adjacent to the rail corridor limited the length of these alignments. A few local railroad lines south of Chambersburg, specifically the CSX Lurgan Subdivision line, provided more opportunities for parallel alignments. However, many of these railroad alignments were also bordered in certain areas by concentrated residential and commercial structures, especially at road crossings. This resulted in several diversions from parallel alignments to avoid these areas.

The existing transmission line network within the Project Study Area provided several opportunities for paralleling, but most opportunities were limited in length due to the general orientation of the transmission line and the extent of development in the area. North of Chambersburg and west of I-81, residential and commercial development has been built up to the edge of the existing transmission lines and approved planned development in the surrounding open fields limited options to divert from paralleling the existing transmission line alignment in many of these areas. As with the railroads, opportunities were identified south of Chambersburg to parallel longer sections of the transmission line system, specifically the FE Ringgold-West Waynesboro and FE Fayetteville-West Waynesboro transmission lines. Similarly, alignment shifts to bypass developed areas were necessary in several locations.

Study Segments were also developed along the edge of South Mountain. However, the number of Study Segments that could be developed in this area was limited by general constructability issues associated with construction on steep terrain, in addition to the extensive forest clearing that would be required for these Study Segments and the access needed for construction. Study Segments were also required to cross Michaux State Forest, which was unavoidable south of U.S. Route 30 due to the dense development along the western slopes of South Mountain. According to PADCNR, Michaux State Forest is a last vestige of undeveloped forested habitat in this section of Pennsylvania. Michaux State Forest also provides habitat for federally listed species and several state-listed species of concern, some of which are associated with the Mt. Cydonia Ponds Natural Area that is located adjacent to the Study Segment crossing through the state forest. This natural area was established to protect the numerous vernal ponds scattered throughout the

area that provide critical breeding habitats for certain reptiles and amphibians. Although not directly crossing the ponds in the natural area, the alignment would span adjacent vernal ponds that are part of the same hydrologic system and potentially contain the same sensitive species.

In addition to these various opportunity corridors, several Study Segments developed for the Project extended across other sections of undeveloped agricultural or forested lands. These segments were developed to maintain a direct alignment, where feasible, while maximizing distance from residential and farm structures; minimizing forest clearing and limiting alignments through topographically challenging areas.

3.5.4 Study Segment Analysis

As noted in **Figure 5** in light gray, there were numerous Study Segments presented during the first public open house that encompassed a large area around Chambersburg but narrowed further south as they extended toward the Ringgold Substation. Due the funneling aspect of the four identified crossings over U.S. Route 30, three major corridors were noted extending east, south, and west from the Rice Substation review area. Eastern Study Segments extended along portions of South Mountain and across a section of Michaux State Forest before intersecting with an existing transmission line corridor that extends south and close to Waynesboro. Central Study Segments paralleled existing transmission line corridors and I-81 toward the two U.S. Route 30 crossing areas and then used existing railroad corridors or undeveloped lands to head south toward the Ringgold Substation. Western Study Segments extended around the western edge of Chambersburg, across sections of Letterkenny Army Depot, and then back to the east crossing I-81 south of Chambersburg. These Study Segments then parallel a series of existing transmission line corridors into Ringgold Substation.

After the first open house, the Siting Team reviewed the public comments and the information received at the open house and incorporated it into the GIS database. In addition, the Siting Team reviewed and compared Study Segments for impacts to land use, environmentally sensitive areas, and engineering considerations. The assessment of this information resulted in modifications or eliminations to Study Segments as described below.

Overall, the Study Segments along the western perimeter of the Project Study Area noted more potential human/built and environmental impacts, as well as engineering challenges, relative to the central and eastern options. Study Segments near the Letterkenny Army Depot identified several considerable engineering challenges **(**Area 1 in **Figure 5)**. These challenges included numerous railroads in and around Letterkenny Army Depot that would have to be crossed by the Project. In addition, the Franklin County Regional Airport, located to the east of Letterkenny, may limit the height of the transmission line structures, further complicating the ability to cross the numerous railroads. Finally, the dense commercial development on the boundaries of the Letterkenny Army Depot would not feasibly accommodate the 130 foot wide ROW required for

the Project. Therefore, Study Segments to the west of Chambersburg were eliminated from further review.

Study Segments further to the south that paralleled the FE Allegheny Energy-Reid Transmission Line near Marion, Pennsylvania **(**Area 2 in **Figure 5)** were noted to bypass around areas of dense residential or industrial structures, limiting the length of parallel opportunities. In addition, numerous transmission line crossings would be required to avoid the developed areas resulting in engineering challenges and potential visual impacts due to a series of taller structures. Assessment of the southernmost Study Segments that parallel the FE Reid-Ringgold Transmission Line **(**Area 3 in **Figure 5)** noted these same human/built and engineering concerns but also identified complex environmental issues along sections near the Ringgold Substation. These included historic resources and numerous crossings of tributaries to Little Antietam Creek. For these reasons, the Study Segments along these areas were eliminated from further review.

Study Segments presented at the second open house **(dark gray** lines in **Figure 5)** were concentrated between South Mountain to the east and Chambersburg and I-81 to the west. After the second open house, the Siting Team reviewed the public comments and revised the remaining Study Segments where reasonable and practicable.

During this time, Transource was also in the process of finalizing their substation siting analysis, which was focused on two potential sites adjacent to the FE Hunterstown-Conemaugh 500 kV transmission line. Specific factors evaluated for the substation site included adjacent land use, soil and geological conditions, grading requirements, required area for stormwater controls and transmission line orientation entering and exiting the substation, distance from the 500 kV line, and road accessibility for delivery of the transformers, which can be limited by the grade of a road. The substation siting process initially assessed a section of the existing 500 kV corridor and identified over ten possible sites. Many of these sites were eliminated due to a variety of reasons including proximity to residential development, environmental issues, proximity to the 500 kV transmission line, and land development constraints. The site for the new Rice 500/230 kV Substation identified in 2017 was selected along SR 696 to minimize potential geotechnical issues that would make the design and construction of the substation more challenging from an engineering perspective.

Upon identification of the substation site and completion of the Study Segment refinement process in 2017, these Study Segments were then used to develop the Alternative Routes. Portions of the Project Study Area associated with eliminated Study Segments were removed to create a refined Project Study Area of approximately 210 square miles. From this point forward, the Project Study Area refers to that 210 square mile area that is the focus of the evaluation completed for the Alternative Routes(**Figure 5**).

Upon renewal of the Project in 2025 and re-review of the Alternative Routes in the field, minor adjustments were completed to Alternative Route A to address development that had occurred along the alignment since 2017. The routes presented at the third 2026 open houses are presented in Figure 5 as **black** lines, as further detailed below in Section 3.5.5.

3.5.5 Summary of 2026 Modifications

Four modifications were made in 2026 that involved adjusting the alignment of Alternative Route A and the location of the Rice Substation.

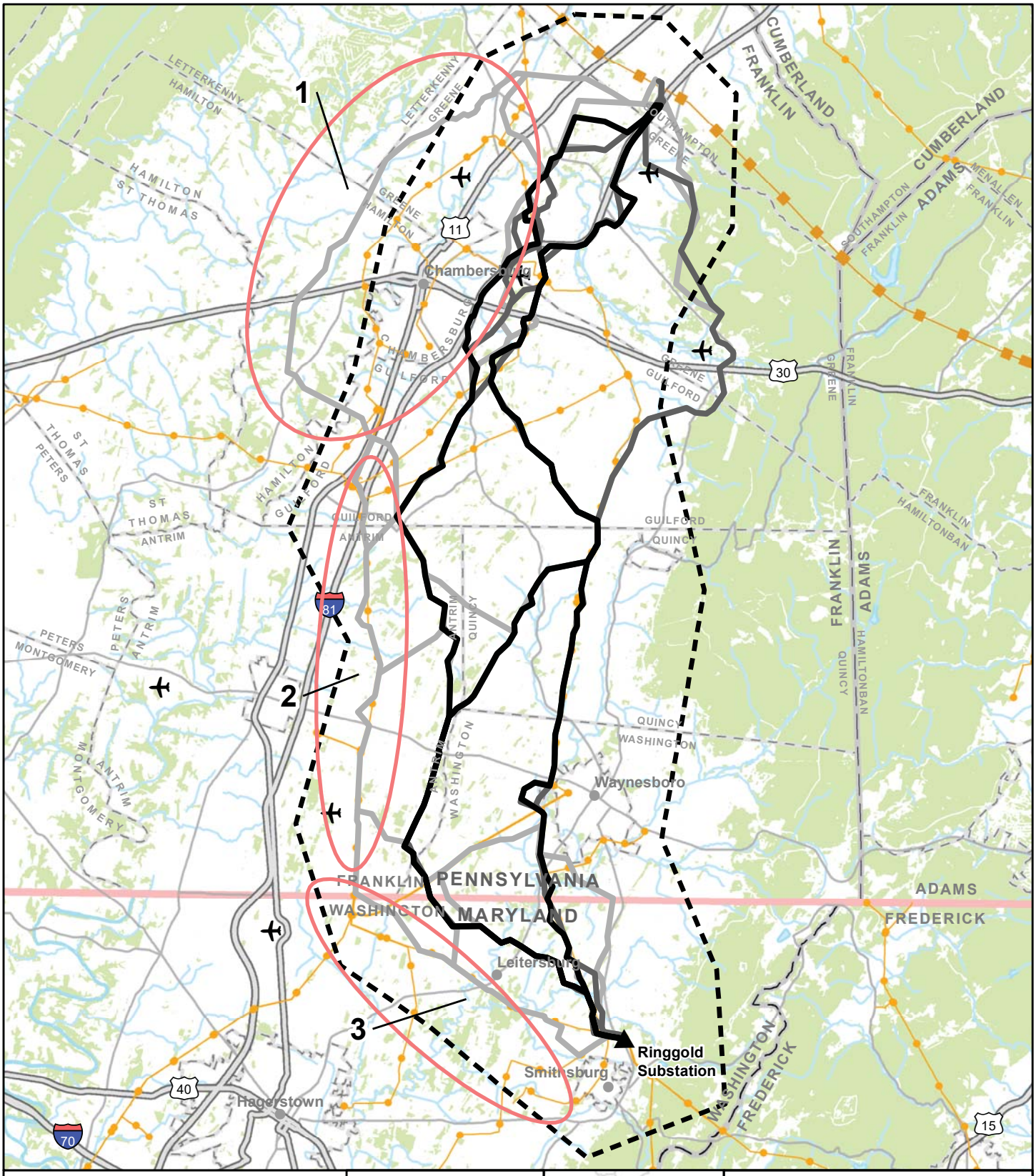
- Modification 1 - Realignment of Alternative Route A due to two areas of new residential development under construction and one area of future development.
- Modification 2 – Future plans at Chambersburg Area Middle School to redesign the school placing it too close to Alternative Route A.
- Modification 3 – Relocation of the proposed Rice Substation west of I-81.
- Modification 4 – Relocation of Alternative Route A due to planned commercial expansion.

As discussed above, the original alignment of Alternative Route A (A1 in **Figure 6a**) was observed to presently consist of areas of new development that made the option not viable. Reassessment of the Project Study Area in this new constrained section was conducted to identify a new route option (first modification). During this time, governmental officials in the greater Chambersburg area requested that the Interstate-81 corridor that extends along the eastern side of Chambersburg be further evaluated for potential paralleling opportunities. Since the section of the original Alternative Route A alignment that required realignment was located near this highway, the possible use of Interstate-81 became one of the focus areas. A potential route was identified that would have extended along an approximate 2.9 mile section of the highway, which would have included an unobstructed crossing of U.S. Route 30 (A2 in **Figure 6a**). Most of this alignment took advantage of open lands that border the highway, but the remaining portions involved the route being in close proximity to several commercial buildings, needing to cross back and forth over the highway to avoid residentially constrained areas, and having to traverse a 0.3 mile part of the Chambersburg Area Middle School property. Despite the complexity of the route, it was considered a potentially viable revision to the previous Alternative Route A and was moved forward for further evaluation and presented to the public during the open house events conducted in March 2026. Further coordination with the government officials in March and April 2026, however, revealed that plans to rebuild the middle school closer to the highway could result in a constraint to the route. Review of the proposed school plans concluded the proposed route would be too close to the school buildings for reasonable development (**Figure 6b**). As a consequence of these social and engineering constraints, this potential re-route to Alternative Route A was removed from further review.

Following these updates another revised Alternative Route A (A3 in **Figure 6a**) was developed to connect to a section of Alternative Routes B and C that were collocated through this area (second modification). This modification involved two new short connecting segments that crossed open lands with one section being north of the U.S Route 30 crossing and the second south of the crossing. This revised Alternative Route A alignment that is collocated with Alternative Routes B and C at the U.S. Route 30 crossing is the route option discussed in the rest of this Siting Study.

The third modification involved a change in the location of the Rice Substation. The original site identified in 2017 was on the east side of Interstate 81 and adjacent to SR 696. Based on geotechnical concerns identified with this site in 2025, the Rice Substation was relocated in 2026 approximately one mile further south, on the west side of Interstate 81, and adjacent to Rice Road. All three of these modifications required reassessment of the metric values for the Alternative Routes, as further detailed in this Siting Study.

The fourth modification involved Alternative Route A and shifting the alignment to cross Cider Press Road at a location further south than the original location, to avoid encroaching upon a parcel that is planned for future commercial development, as shared by government officials.



Substation
Airports
1st Open House Segments (Eliminated)
2nd Open House Segments (Eliminated)
3rd Open House Routes
Study Area Eliminated
Alternative Route Review Study Area

Existing Transmission Line
Below 100 kV
115kV - 230 kV
Greater than 345kV
Highway
Road
Stream
Forest Cover

Data Sources: Transource (2026), Rextag Electric Transmission (2021), NPS (2026), DCNR (2026), NLCD Forest Cover (2024)

Coordinate System:
UTM Zone 18N
NAD 83

May 11, 2026

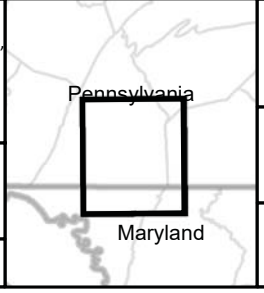
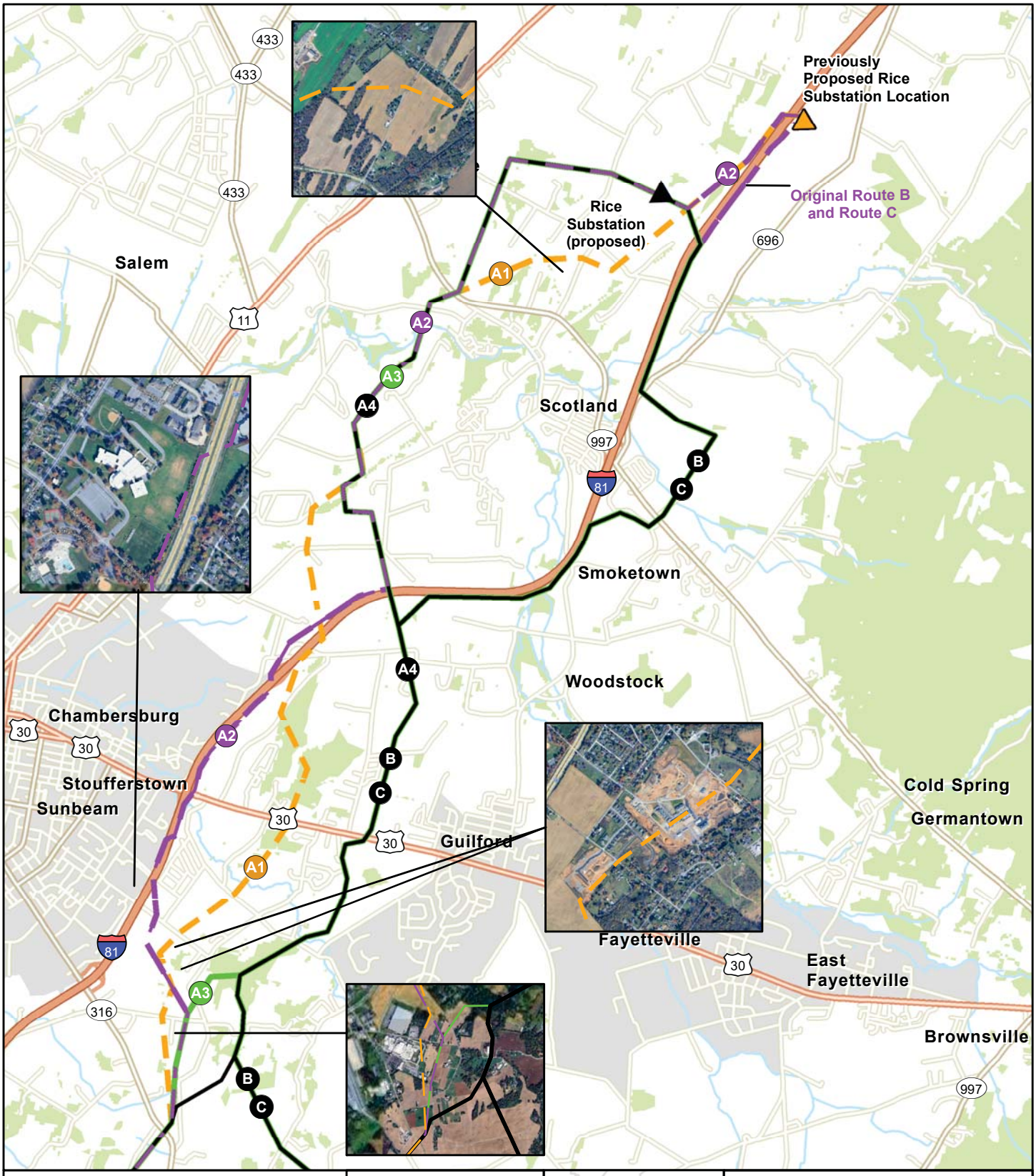


Figure 5
Study Segments

Rice - Ringgold 230 kV Transmission Line Project

TRANSOURCE

0 1 2 3 4
Miles



2017/2026 Initial Proposed Substation

2026 Final Proposed Substation

2017 Alternative Routes

2026 Initial Alternative Routes

2026 School Avoidance Alternative Route

2026 Final Alternative Routes

Forest Cover

Data Sources: Transource (2026), NLCD Forest Cover (2024)

Coordinate System:
UTM Zone 18N
NAD 83

May 11, 2026

Pennsylvania

Maryland

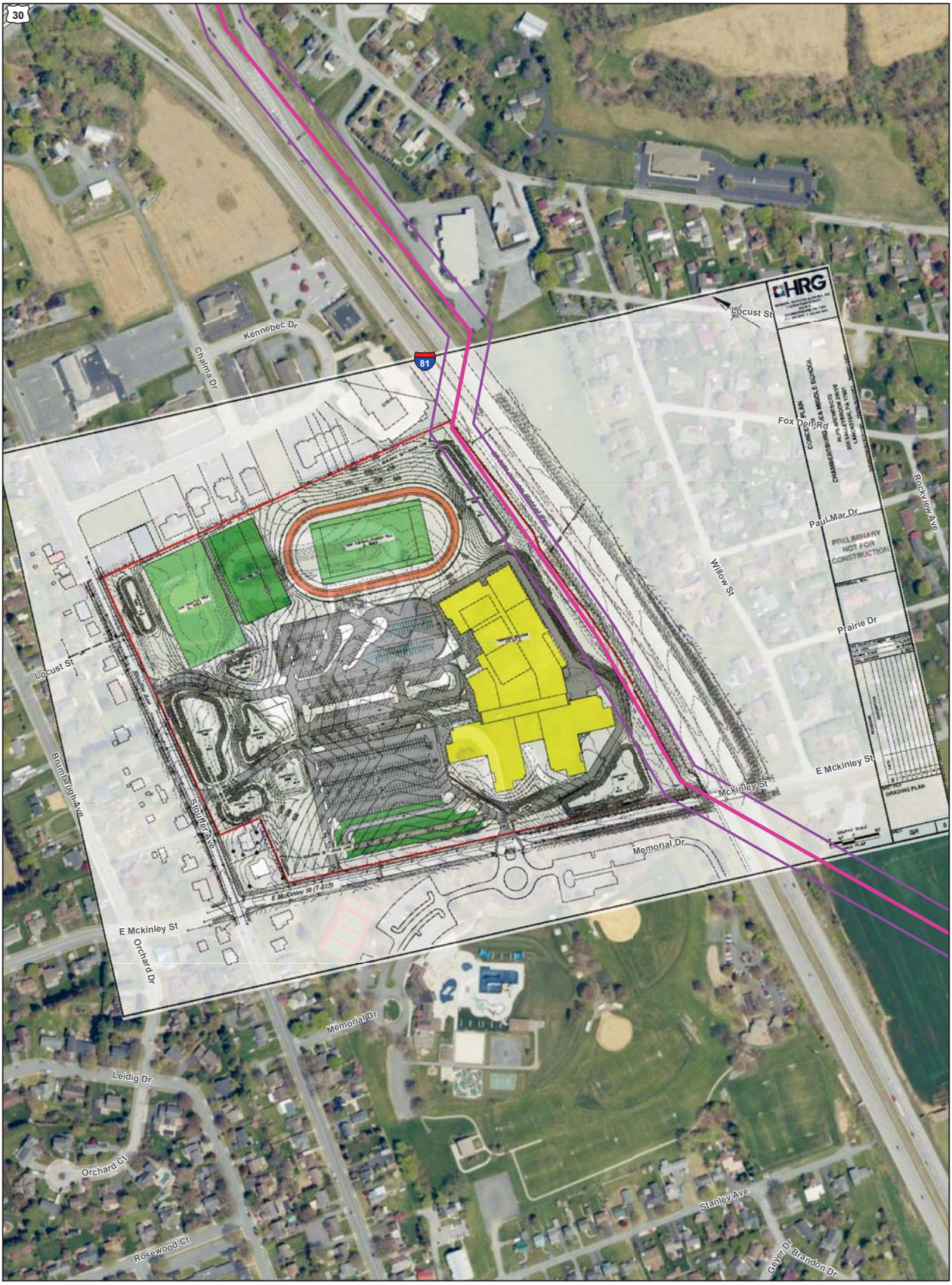
Figure 6a
Alternative Route Updates

Rice - Ringgold 230kV Transmission Line Project

TRANSOURCE

0 0.25 0.5 0.75 1

Miles



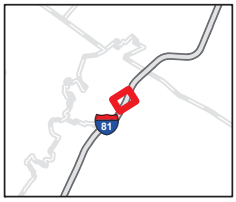
Legend

- Alternative Route A
- Alternative Route A Proposed ROW

N

0 75 150 300

Feet



Chambersburg Area Middle School Preliminary Plans provided by Chambersburg School District 4/1/2026.

Rice-Ringgold 230 kV Transmission Line Project Transource, LLC	Job: 60528995 Prepared by: MWC Checked by: HB Date: 4/10/2026	**Figure 6b CHAMBERSBURG AREA MIDDLE SCHOOL FOCUS AREA**

3.6 Alternative Routes

The Siting Team evaluated the resulting Study Segments to identify combinations that provided complete connection between the Rice and Ringgold Substations. These combinations were the basis for development of the Alternative Routes for the Project. Ultimately, three (3) Alternative Routes were identified for a detailed comparative analysis to determine a Proposed Route.

In 2026, the alignments of the three Alternative Routes were reassessed to evaluate the land use that they currently cross. A section of Alternative Route A was noted to cross over lands south of U.S. Route 30 that had been converted from crop fields to dense residential developments. Sections of this same route were also noted to be in the early stages of conversion from crop fields to residential developments on the west side of I-81. Re-evaluation of the area around this section of the Alternative Route A alignment identified short segments of undeveloped crop fields that provided an opportunity to connect Alternative Route A with the other two alternative routes, which are collocated through this section due to the densely developed U.S. Route 30 crossing. The other two Alternative Routes crossed similar landscapes as documented in 2017, required no change, and were considered still viable.

In addition, adjustment of the Rice Substation to a location further to the south resulted in minor modifications to each of the Alternative Routes.

The following descriptions of the Alternative Routes reflect the updates made in 2026 due to the adjustment of a section of Alternative Route A and relocation of the Rice Substation. The Alternative Routes are shown in more detail in **Figure 7.**

3.6.1 Alternative Route A (30.1 miles – of which 23.5 is in PA)

- Alternative Route A exits the Rice Substation and turns west for 1.3 miles traveling across agricultural fields and through a small, forested area. Rice Road is spanned halfway along this section.
- Turning sharply to the south and southwest, the route extends for 1.3 miles across more agricultural fields and other small, forested areas before reaching Mickey Inn Road, which is bordered at the crossing location by a few residential parcels. Black Gap Road (SR 997) is also spanned in this section.
- Continuing to the south and southwest, the route extends across a mix of agricultural and forested lands for 1.6 miles to the active Norfolk Southern rail line. Conococheague Creek, which is designated by PADEP as a Cold Water Fishes (CWF) stream, is spanned in this section. A dense residential community along Sycamore Grove Road will be bordered by the route, which starts to parallel the FE Letterkenny-Grand Point 138 kV line that extends through this community. This section also crosses a portion of the

Eastern Greene Township Rural Historic District that borders both sides of a Norfolk Southern rail line.

- Crossing to the south side of the railroad line, the route extends 0.9 miles southeast across agricultural lands to I-81, with portions still paralleling the FE Letterkenny-Grand Point 138 kV line. A large farm and several residential parcels located along Grande Point Road are passed in this area which are within the Eastern Greene Township Rural Historic District.

1. At this point, the route crosses to the east side I-81 and parallels the FE Letterkenny-Grand Point 138 kV line to the southeast for 0.8 miles, crossing Walker Road, to the Grand Point Substation, where the route turns sharply to the south for 1.0 miles to U.S. Route 30. The Lost Acres Airport is located approximately 0.6 miles west of the route.

- Prior to crossing commercial lined U.S. Route 30, the route first crosses over to the west side of the transmission line, which is now the FE Grand Point-Allegheny Energy 138 kV line and then spans the highway. The route turns sharply west and then south for 0.5 miles to bypass around a commercial building. After going around the building, the route again parallels the FE Grand Point-Allegheny Energy 138 kV line for 0.3 miles.
- Alternative Route A deviates from the transmission line corridor to bypass around homes along the line. Along this section, the route extends for 0.7 miles to the southwest and spans Falling Spring Branch (HQ-CWF), crosses Falling Spring Road, and traverses through a forested area that contains several homes. Within the forest, the route turns south, travels across an agricultural field and spans the FE Grand Point-Allegheny Energy 138 kV line near Henry Lane.
- After crossing this road, the route travels for 1.4 miles to the southwest across agricultural fields before crossing Cider Press Road and turning south toward Wayne Road (SR 316).
- After crossing SR 316, the route extends for 2.0 miles crossing open fields, spanning the CSX Lurgan Division railroad line, paralleling and crossing Stone Quarry Road, crossing New Franklin Road, and spanning the FE Fayetteville-Allegheny Energy 115 kV transmission line, before turning sharply west to intersect with Helman Road.
- From Helman Road, Alternative Route A crosses open farm lands for 1.7 miles to the southwest before turning sharply to the southeast to cross Swamp Fox Road (SR 914).
- After crossing SR 914, the route traverses approximately 5.3 miles to the southeast through existing agricultural fields, making turns to avoid structures and spanning several local roads, until it reaches the west side of the active CSX Lurgan Division railroad line.
- Alternative Route A parallels the west side of the CSX railroad tracks for approximately 0.9 miles to the Buchanan Trail East (SR 16) crossing, where the route crosses the commercial-lined road and the railroad tracks to continue paralleling the east side of the tracks for approximately 2.4 miles. The route crosses one unnamed WWF stream in this section as well as crossing Barr Road and McDowell Road.

- The route turns sharply to the southeast for approximately 1.4 miles across predominantly agricultural fields toward Leitersburg Road (SR 2002), crossing Marsh Run (WWF) and the FE Reid-West Waynesboro 69 kV transmission line along the alignment.
- After crossing SR 2002, the route spans the Pennsylvania/Maryland state line and turns for 1.0 miles to the southeast to parallel Leiters Mill Road (was Leitersburg Road in Pennsylvania) until it reaches Millers Church Road, where the route turns sharply east, crossing both roads.
- The route continues east and southeast for 1.8 miles through agricultural fields, crossing an unnamed tributary to Antietam Creek, Antietam Creek, and then paralleling Battletown Road before intersecting with Leitersburg Pike (Maryland (MD) 60).
- After spanning MD 60, Alternative Route A extends 1.5 miles across agricultural lands to Poplar Grove Road, spanning Ringgold Pike (MD 418) and three unnamed tributaries to Little Antietam Creek.
- Turning east, the route extends for 0.6 miles over agricultural lands to intersect with the Ringgold-West Waynesboro 138 kV transmission line, which it parallels to the southwest for 0.4 miles. This section spans Newcomer Road and Gardenhour Road, crosses Little Antietam Creek and two tributaries, and extends through an orchard.
- Extending out for 0.5 miles to the southwest from the transmission line, Alternative Route A bypasses around residential structures along Rowe Road and traverses agricultural lands before spanning over to the south side of the FE Reid-Ringgold 138 kV transmission line.
- The route turns east for 0.8 miles and extends into the southeastern corner of the Ringgold Substation, spanning the FE Ringgold-East Hagerstown 138 kV transmission line four times and Smithsburg Pike (MD 64) along the alignment.

3.6.2 Alternative Route B (31.0 miles – of which 24.4 miles is in PA)

- Alternative Route B exits the Rice Substation from the southeast corner and spans 0.2 miles east over the active Norfolk Southern railroad and to the east side of I-81, where it turns to the south to parallel I-81 for 1.1 miles to SR 696. Along this stretch the route crosses Pine Stump Road, Mountain Run (CWF), and is within 0.5 miles of the Rocktop Airport that is located to the east past SR 696.
- The route turns sharply east to cross SR 696 perpendicularly and travels approximately 0.6 miles to the east-southeast through an agricultural field before turning sharply to the southwest.
- Travelling southwest for 0.7 miles, the route crosses Phillaman Run (CWF) and then crosses Black Gap Road (SR 997) in a perpendicular fashion. Alternative Route B meanders for 0.6 miles around the Chambersburg Mall, generally following the outer edge of the

parking lot on the eastern and northern sides of the mall, and then heading west to intersect with I-81 again.

- After reaching the eastern side of I-81, Alternative Route B turns sharply south and parallels the interstate for approximately 1.4 miles; at this location I-81 and the route generally travel in a western direction. Along this section, Alternative Route B traverses the edge of agricultural fields and crosses an unnamed stream (CWF) and the Conococheague Creek (CWF).
- Alternative Route B turns sharply to the southwest and travels 0.4 until it reaches the existing FE Letterkenny-Grand Point 138 kV transmission line. The route stays to the east of this system and parallels it south for approximately 1.6 miles toward U.S. Route 30, spanning along agricultural fields, around the Grand Point Substation, and over Walker Road. The Lost Acres Airport is located approximately 0.6 miles west of the route.
- Prior to crossing commercial lined U.S. Route 30, the route first crosses over to the west side of the transmission line, which is now the FE Grand Point-Allegheny Energy 138 kV line and then spans the highway. The route turns sharply west and then south for 0.5 miles to bypass around the commercial building. After going around the building, the route again parallels the FE Grand Point-Allegheny Energy 138 kV line for 0.5 mile.
- Alternative Route B deviates from the transmission line corridor for 1.1 mile to bypass around homes along the line. Along this section, the route extends to the southwest and spans Falling Spring Branch (HQ-CWF), crosses Falling Spring Road, and traverses through a forested area that contains several homes. Within the forest, the route turns south, travels across an agricultural field and spans the FE Grand Point-Allegheny Energy 138 kV line near Henry Lane.
- After crossing this road, Alternative Route B extends to the southeast for approximately 4.6 miles over agricultural fields to Yohe Road, where it intersects with the FE Fayetteville-West Waynesboro 138 kV transmission line. This section involves crossing of two unnamed WWF streams, one CWF stream, several local roadways, and the FE Fayetteville-Allegheny Energy 115 kV transmission line.
- As the route crosses Yohe Road, it also spans to the east side of the FE Fayetteville-West Waynesboro 138 kV transmission line and then turns sharply to the south to parallel this existing line for approximately 1.0 mile; an unnamed CWF stream is crossed in this section, as is Stamey Hill Road.
- At this point, Alternative Route B turns sharply to the west and spans to the west side of the FE Fayetteville-West Waynesboro 138 kV transmission line and travels for approximately 1.0 miles across agricultural fields, Buttermilk Road, and one CWF stream and intersects with the CSX Lurgan Division railroad corridor.
- The route turns to the southwest and parallels the CSX railroad for approximately 4.5 miles, with some deviations to bypass around residential and agricultural facilities

adjacent to the railroad line. This stretch crosses Wayne Highway (SR 316), several local roads, and three unnamed CWF streams.

- At this point, Alternative Route B crosses to the west side of the CSX rail line and parallels the west side of the CSX railroad tracks for approximately 0.9 mile to the Buchanan Trail East (SR 16) crossing, where the route crosses the commercial-lined road and the railroad tracks to continue paralleling the east side of the tracks for approximately 2.4 miles. The route crosses one unnamed WWF stream in this section as well as crossing Barr Road and McDowell Road.
- The route turns sharply to the southeast for approximately 1.3 miles across predominantly agricultural fields toward Leitersburg Road (SR 2002), crossing Marsh Run (WWF) and the FE Reid-West Waynesboro 69 kV transmission line along the alignment.
- After crossing SR 2002, Alternative Route B spans the Pennsylvania/Maryland state line and turns for 1.0 mile to the southeast to parallel Leiters Mill Road (was Leitersburg Road in Pennsylvania) until it reaches Millers Church Road, where the route turns sharply east, crossing both roads.
- The route continues east and southeast for 1.8 miles through agricultural fields, crossing an unnamed tributary to Antietam Creek and Antietam Creek, and paralleling Battletown Road before intersecting with Leitersburg Pike (Maryland (MD) 60).
- After spanning MD 60, Alternative Route B extends 1.5 miles across agricultural lands to Poplar Grove Road, spanning Ringgold Pike (MD 418) and three unnamed tributaries to Little Antietam Creek.
- Turning east, the route extends for 0.6 miles over agricultural lands to intersect with the Ringgold-West Waynesboro 138 kV transmission line, which it parallels to the southwest for 0.4 miles. This section spans Newcomer Road and Gardenhour Road, crosses Little Antietam Creek and two tributaries, and extends through an orchard.
- Extending out for 0.5 mile to the southwest from the transmission line, Alternative Route B bypasses around residential structures along Rowe Road and traverses agricultural lands before spanning over to the south side of the FE Reid-Ringgold 138 kV transmission line.
- The route turns east for 0.8 miles and extends into the southeastern corner of the Ringgold Substation, spanning the FE Ringgold-East Hagerstown 138 kV transmission line four times and Smithsburg Pike (MD 64) along the alignment.

3.6.3 Alternative Route C (27.9 miles – of which 23.5 miles is in PA) (the Proposed Route)

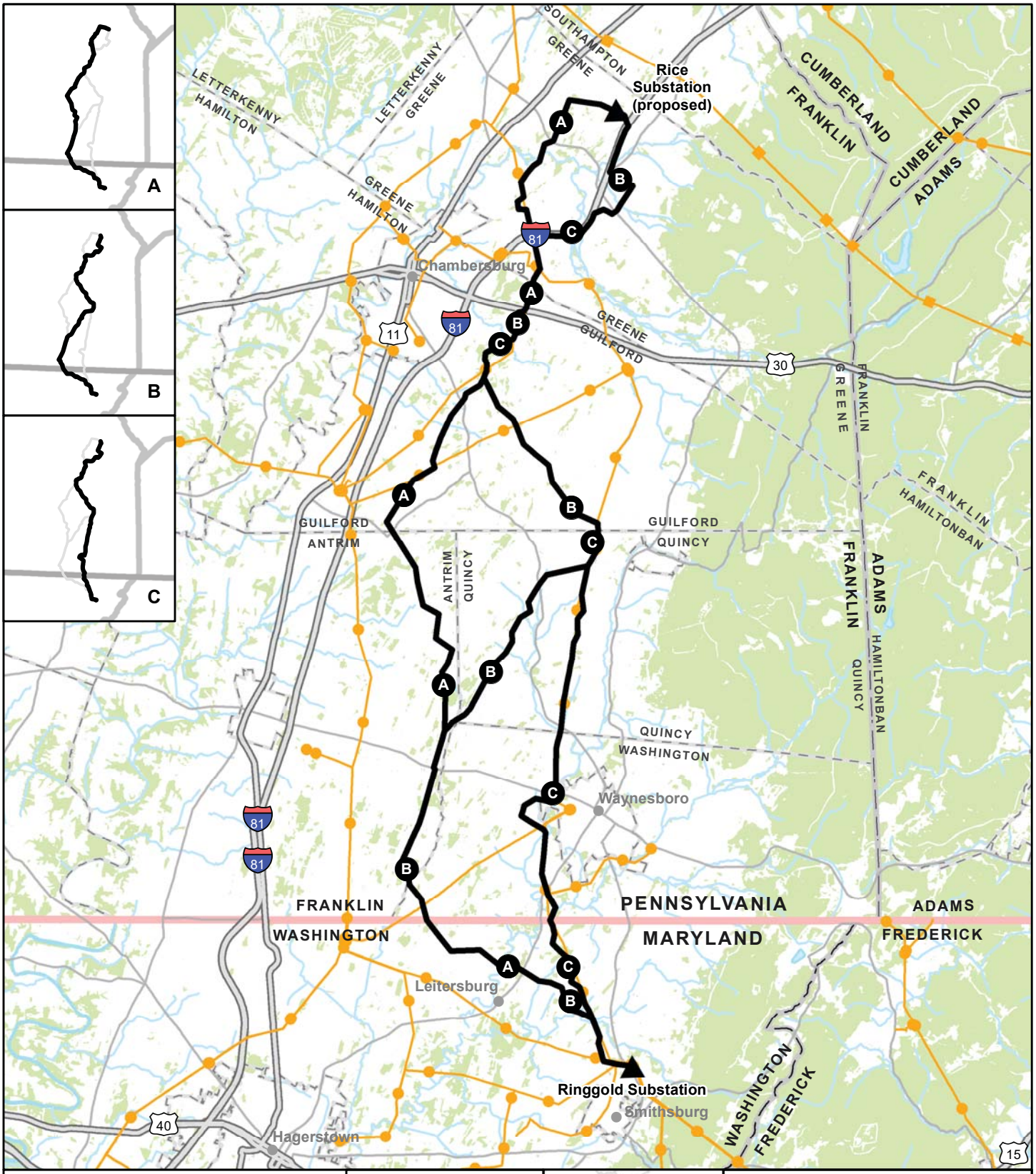
- Alternative Route C exits the Rice Substation from the southeast corner and spans 0.2 miles east over the active Norfolk Southern railroad and to the east side of I-81, where it turns to the south to parallel I-81 for 1.1 miles to SR 696. Along this stretch the route

crosses Pine Stump Road, Mountain Run (CWF), and is within 0.5 miles of the Rocktop Airport that is located to the east past SR 696.

- The route then turns sharply east to cross SR 696 perpendicularly and travels approximately 0.6 mile to the east-southeast through an agricultural field before turning sharply to the southwest.
- Travelling southwest for 0.7 miles, Alternative Route C crosses Phillaman Run (CWF) and then crosses Black Gap Road (SR 997) in a perpendicular fashion. Alternative Route C traverses for 0.6 miles around the perimeter of the Chambersburg Mall, generally following the outer edge of the parking lot on the northern and eastern sides of the mall, and then heading west to parallel with I-81 again.
- After reaching the eastern side of I-81, Alternative Route C turns sharply south and parallels the interstate for approximately 1.4 miles and at this location I-81 and the route generally travel in a western direction. Along this section, Alternative Route C traverses the edge of agricultural fields and crosses an unnamed stream (CWF) and the Conococheague Creek (CWF).
- Alternative Route C turns sharply to the southwest and travels 0.4 until it reaches the existing FE Letterkenny-Grand Point 138 kV transmission line. The route stays to the east of this system and parallels it south for approximately 1.6 miles toward U.S. Route 30, spanning along agricultural fields, around the Grand Point Substation, and over Walker Road. The Lost Acres Airport is located approximately 0.6 miles west of the route.
- Prior to crossing commercial lined U.S. Route 30, Alternative Route C first crosses over to the west side of the transmission line, which is now the FE Grand Point-Allegheny Energy 138 kV line and then spans the highway. The route turns sharply west and then south for 0.5 miles, spanning across a parking lot and bypassing around a commercial building. After going around the building, the route again parallels the FE Grand Point-Allegheny Energy 138 kV line for 0.5 mile.
- Alternative Route C deviates from the transmission line corridor for 1.1 mile to bypass around homes along the line. Along this section, the route extends to the southwest and spans Falling Spring Branch (HQ-CWF), crosses Falling Spring Road, and traverses through a forested area where homes are present to the east. Within the forest, the route turns south, travels across an agricultural field and spans the FE Grand Point-Allegheny Energy 138 kV line near Henry Lane.
- After crossing this road, Alternative Route C extends to the southeast for approximately 4.6 miles over agricultural fields to Yohe Road, where it intersects with the FE Fayetteville-West Waynesboro 138 kV transmission line. This section involves crossing of two unnamed WWF streams, one CWF stream, several local roadways, and the FE Fayetteville-Allegheny Energy 115 kV transmission line.

- As Alternative Route C crosses Yohe Road, it also spans to the east side of the FE Fayetteville-West Waynesboro 138 kV transmission line and then turns sharply to the south to parallel this existing line for approximately 1.7 mile; an unnamed CWF stream is crossed in this section, as is Stamey Hill Road.
- A 0.6 mile deviation from the colocation is required in the vicinity of the Manheim Road crossing due residential development that has built up adjacent to the transmission line and the route then parallels the existing line for 0.5 miles on the eastern side.
- At Hess Benedict Road, Alternative Route C crosses over to the west side of the FE Fayetteville-West Waynesboro 138 kV transmission line to avoid agricultural and residential structures. The route parallels the line for another 3.7 miles, traversing agricultural fields, crossing Orphanage Road, Wayne Highway (SR 316), and Buchanan Trail East (SR 16), as well as an unnamed CWF stream.
- After crossing SR 16, Alternative Route C turns sharply to the west and parallels this line for approximately 0.4 miles. This stretch includes a crossing of Cold Springs Road and an unnamed CWF stream.
- Turning to the south and then east, Alternative Route C extends for 1.2 miles to Marsh Road. The route traverses an agricultural field to avoid agricultural and residential structures, and crosses an unnamed CWF stream, the FE Reid-West Waynesboro 69 kV line, and the FE Ringgold-West Waynesboro 138 kV line.
- After crossing Marsh Road and an unnamed CWF stream, Alternative Route C turns sharply south to parallel the east side of the FE Ringgold-West Waynesboro 138 kV line for 2.1 miles. Alternative Route C crosses agricultural fields, Hagerstown Road (SR 316), the FE Ringgold-East Waynesboro 115 kV line, and the East Branch Antietam Creek (CWF) along this stretch. The route extends away from the transmission line corridor to avoid residential structures near the southern end of this section prior to crossing Lyons Road.
- Spanning to the west side of the FE Ringgold-West Waynesboro 138 kV line, Alternative Route C turns south and crosses the Pennsylvania/Maryland state line. The route generally parallels the transmission line for approximately 2.6 miles until it intersects with Gardenhour Road. Some deviations are required along this stretch to avoid agricultural operations and structures. The route in this section crosses Rocky Forge Road, Ringgold Pike (SR 418), Poplar Grove Road, and Newcomer Road, as well as numerous crossings of various tributaries to Little Antietam Creek.
- Alternative Route C crosses Gardenhour Road paralleling the existing transmission line for 0.4 miles and traverses through an orchard.
- Alternative Route C extends out for 0.6 mile to the southwest from the transmission line to bypasses around residential structures along Rowe Road and traverses agricultural lands before spanning over to the south side of the FE Reid-Ringgold 138 kV transmission line.

- Alternative Route C turns east for 0.8 mile and extends into the southeastern corner of the Ringgold Substation, spanning the FE Ringgold-East Hagerstown 138 kV transmission line four times and Smithsburg Pike (MD 64) along the alignment.


A
B
C
Rice Substation (proposed)
Ringgold Substation
Chambersburg
Waynesboro
Leitersburg
Hagerstown
Smithsburg
Letterkenny
Hamilton
Greene
Southampton
Cumberland
Franklin
Adams
Guilford
Antrim
Quincy
Washington
Hamiltonban
Frederick
Pennsylvania
Maryland
81
11
30
40
15
Substation
Alternative Routes
Existing Transmission Line
Below 100 kV
115 - 230kV
Greater than 230kV
Highway
Road
Stream
Forest Cover
Data Sources: Transource (2026), Rextag Electric Transmission (2021), NLCD Forest Cover (2024)
Coordinate System: UTM Zone 18N NAD 83
May 11, 2026
Pennsylvania
Maryland
Figure 7
Alternative Routes
Rice - Ringgold 230 kV Transmission Line Project
TRANSOURCE
0 1 2 3 4
Miles

4.0 ALTERNATIVE ROUTE COMPARISON

This section further discusses the Alternative Routes and provides a quantitative and qualitative analysis of potential impacts to the social landscape, the environment and cultural resources, and potential engineering considerations. The Alternative Routes were reviewed in detail and compared using a combination of information collected from GIS data sources, public and regulatory input, supporting documents, field review, and the collective knowledge and experience of the Siting Team.

Data in the metric tables below were updated for the 2026 9A West analysis to address changes in the landscape, adjustment of the Rice Substation, and modifications to the various data sources that have occurred since the 2017 Siting Study analysis.

The results of the comparative analysis completed for each of the factors listed in **Table 1** are documented within the respective section of the siting study.

Table 1: Quantitative Siting Factors
Human/Built Factors
Number of parcels crossed by the ROW: Count of the number of parcels crossed by the ROW.
Number of parcels acquired for the ROW: Count of total parcels acquired for the route.
Number of residences within 500 feet of the route centerline: Count of the number of residences within the ROW and within 100 feet, 250 feet and 500 feet of potential routes.
Number of commercial buildings within 500 feet of the route centerline: Count of the number of commercial buildings within the ROW and within 100 feet, 250 feet and 500 feet of potential routes.
Acres of pasture/rangeland crossed by the ROW: Area of pasture or range land crossed by the routes.
Acres of cropland crossed by the ROW: Area of cropland crossed by the routes.
Acres of conservation easements crossed: Private conservation easements crossed by the routes.
Acres of county agricultural easement land crossed: Protected land crossed by the Project that is devoted to agricultural production.
Number of archaeological resources within the ROW and within 250 feet of centerline: Previously identified archeological resources.
Number of historic architectural resources within the ROW, within 0.25 mile: Previously identified historic architectural resource sites and districts listed or eligible on the NRHP.
Institutional uses (schools, places of worship and cemeteries) within 1000 feet (schools and places of worship) or 250 feet (cemeteries and hospitals) of the route centerline: Locations of cemeteries, churches, hospitals, parks, and schools.

Table 1: Quantitative Siting Factors
Environmental Factors
Forest clearing within the ROW: Acres of forest within the ROW - digitized from aerial photography.
Number of National Hydrography Dataset (NHD) stream and waterbody crossings within the ROW: a count of the number of surface water features crossed, such as lakes, ponds, streams, rivers, springs and wells.
Acres of National Wetland Inventory (NWI) wetland crossings within the ROW: The type and acreage of wetlands crossed by the routes.
Acres of 100-year floodplain within the ROW: Acres of 100-year floodplain within the ROW.
Miles of public lands crossed by the route: Miles of federal, state and local lands crossed by the ROW.
Threatened, endangered, rare or sensitive species occurrence within the Project vicinity: Known occurrences; locations of potential habitat based on land use.
Karst topography within the ROW: Represents areas of Dolomite or Limestone (karst-derived geology) crossed by the ROW.
Acres of prime farmland soils within the ROW: Percent of soil associations crossed by the ROW characterized as prime farmland.
Engineering Factors
Route length: Length of route in miles.
Number of angled structures: Anticipated number of angled structures over 30 degrees based on preliminary design.
Number of road crossings: Count of federal, state and local roadway crossings.
Number of pipeline crossings: Number of known pipelines crossed by the transmission ROW.
Number of railroads crossings: Number of railroads crossed by the transmission ROW.
Number of transmission line crossings: Number of high voltage (100 kV or greater) transmission lines crossed by the ROW.
Distance of steep slopes crossed: Miles of slope greater than 20 percent crossed by the routes.
Length of transmission line parallel: Miles of the route parallel to existing high voltage transmission lines.
Length of pipeline parallel: Miles of the route parallel to existing pipelines.
Length of railroad or road parallel: Miles of the route parallel to existing roadways.
Airfield within 1 mile of the route centerline: Distance from airfields.

4.1 Natural Resources

Natural resources are an important consideration in the siting process. The Siting Team attempts to reduce impacts to the natural environment by minimizing the crossing of certain features such as wetlands, streams, forested areas and floodplains, which are also often habitats for sensitive species. Natural resource impacts are assessed for potential effects to vegetation and habitat, surface waters, threatened and endangered species, and conservation and recreation lands. Potential impacts discussed in this section are based on publicly available maps and data, as well as consultation with federal and state agencies. A quantitative comparison of the natural resource considerations for the Alternative Routes is presented at the end of this section in **Table 5**, providing both a project total and state specific breakdown.

4.1.1 Soil and Water Resources

Resource Characteristics

Physiographic Setting and Geology

The Project Study Area is located within the Great Valley and South Mountain Physiographic Sections of the Ridge and Valley Physiographic Province (Sevon 2000). The Great Valley Physiographic Section is characterized as a very broad valley with low to moderate relief. Elevations in this region range from 140 to 1,100 feet above mean sea level (amsl). The South Mountain Physiographic Section is characterized by linear ridges partly dissected by deep valleys and has moderate to high relief. Underlying rock consists of metavolcanic rocks, quartzite, and some dolomite. Elevations in this region range from 450 to 2,080 feet amsl (PADCNR 2026a, Maryland 1967).

The regional geology of the Project Study Area is composed primarily of sedimentary rock units ranging from the older Cambrian to the more recent Ordovician Age. The Ordovician aged formations are located along the lower elevations of the Great Valley Physiographic Section and make up a greater part of the Project Study Area. The older Cambrian aged bedrock units are located in the higher elevations of the South Mountain Physiographic Section and make up a smaller portion of the Project Study Area. Karst features are prevalent throughout the area and are illustrated in **Figure 8a** (PADCNR 2026d, MGS 2026 Reger 2008).

Soils

Within the Project Study Area, almost three-quarters of the soils are listed as Prime Farmland soils. In an effort to identify the extent and location of important farmland soils, the National Resources Conservation Service (NRCS) of the U.S. Department of Agriculture (USDA), has inventoried land that can be used for the production of the Nation's food supply. Important farmland soils vary in degree of productivity from prime farmland to unique farmland to farmland

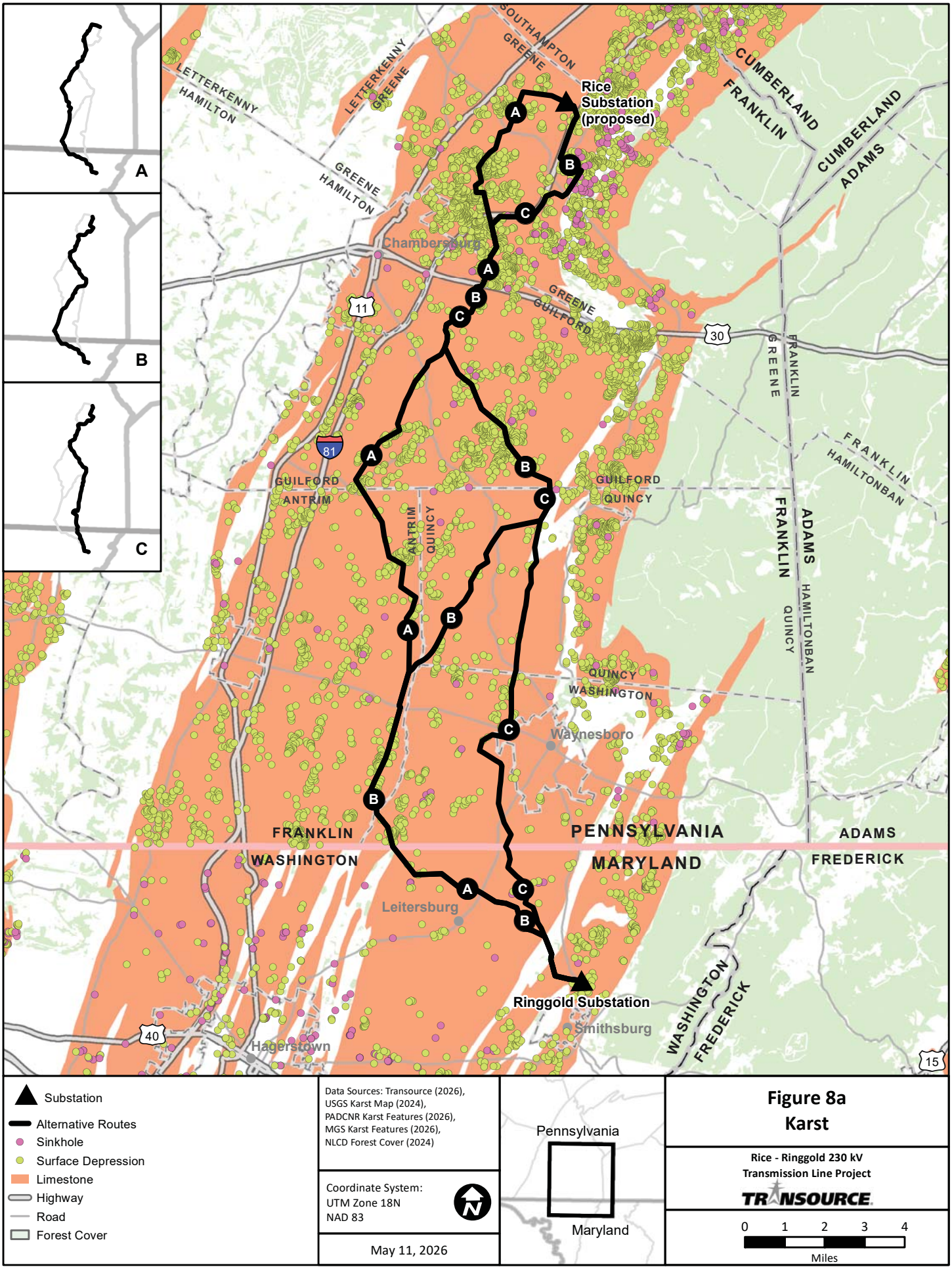
of statewide or local importance. Prime farmland is defined by the NRCS as land that has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and oilseed crops and is available for these uses. These soils could be cultivated land, pastureland, forestland, or other land, which is not urban or built-up land or water areas (USDA/NRCS 2003, USDA/NRCS 1975). Prime farmland soils are identified in **Figure 8b.**

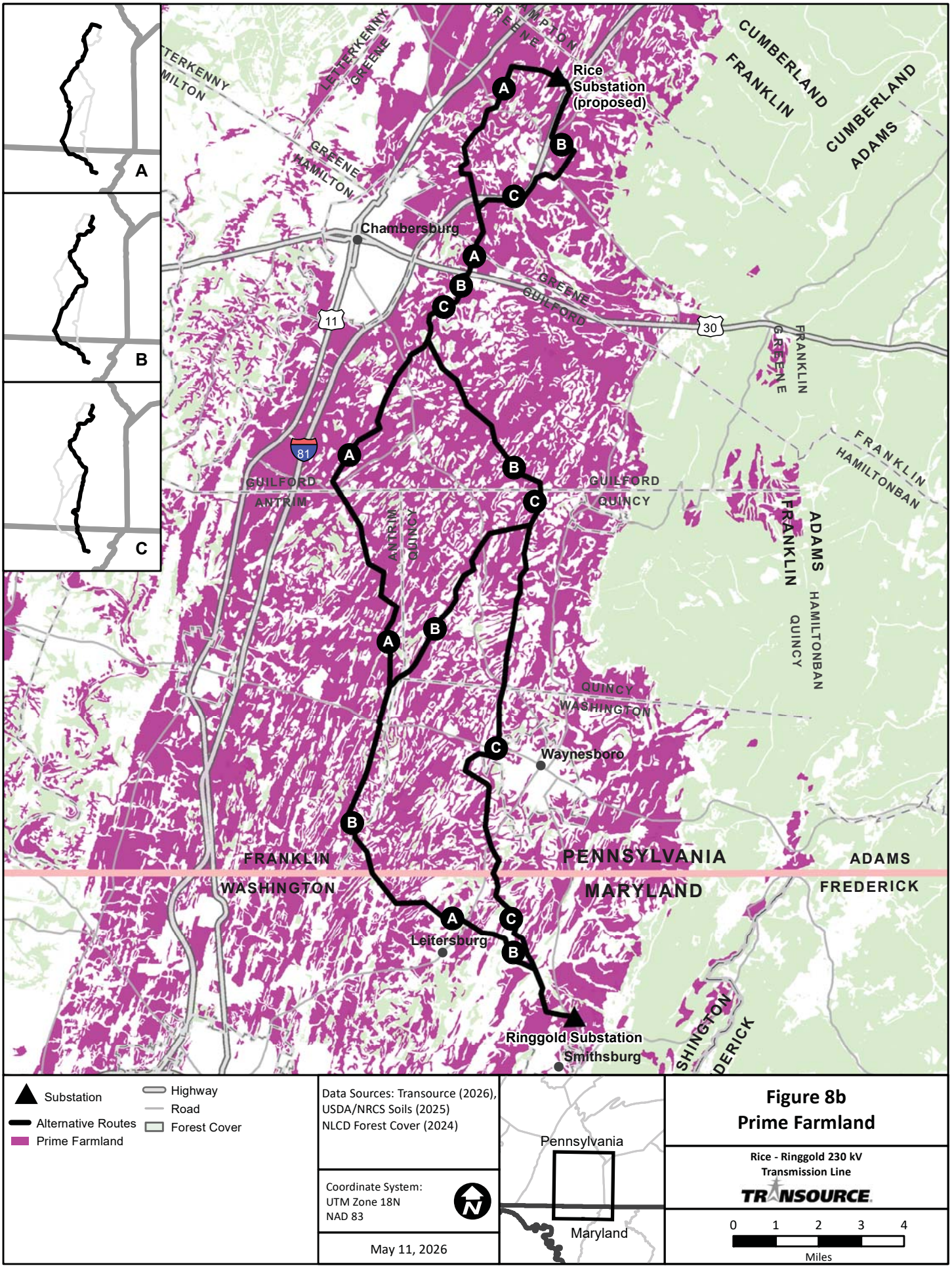
Alternative Route Comparison

Karst topography is a unique condition formed from the dissolution of soluble rocks including limestone and dolomite. The topography is characterized by underground drainage systems that undermine the consistency of the rock and can result in sinkholes and caves. These conditions are difficult for transmission structure engineering, which prefer stable bedrock conditions. Landscape features such as sinkholes may also affect structure placement and access road development. Alternative Route B crosses the most area of karst topography (464.5 acres) and the second most karst features (32). Alternative Route C crosses the least karst topography (404.2 acres) and the least karst features (29). Alternative Route A would cross the second most area of karst topography (461.3 acres) and the most karst features (33). Through detailed engineering, the karst features may be avoided though strategic structure placement, therefore, the area of karst topography crossed is the key metric in this comparison.

All of the Alternative Routes cross agricultural lands comprised of prime farmland soils. In general, long term impacts to agricultural operations will be localized to the structure locations with general farming operations continuing within the ROW. The Project will be designed to allow typical farming vehicles to operate within the ROW. Although the impact to prime farmland soils would be localized, Alternative Route C crosses the fewest acres of these soils as the route alignment is shorter than the other options. Due to their longer lengths, Alternative Routes A and B would cross the most prime farmland soils by an additional 60 acres. Overall, the Siting Team attempted to minimize impacts to agricultural lands, where feasible, by routing along the edge of fields, along farm roads, or in pasture lands.

All temporary ground disturbances will be permitted through the appropriate state agency to ensure soils impacts are adequately addressed through the installation and maintenance of best management practices and restoration of disturbed areas. Aside from structure placement and the few instances of permanent access roads, all other soil impacts will be temporary in nature and returned to preconstruction state.


A
B
C
Rice Substation (proposed)
Ringgold Substation
Chambersburg
Waynesboro
Leitersburg
Smithsburg
Hagerstown
PENNSYLVANIA
MARYLAND
FRANKLIN
WASHINGTON
ADAMS
FREDERICK
CUMBERLAND
GUILFORD
ANTRIM
QUINCY
HAMILTONBAN
GREENE
LETTERKENNY
SOUTHAMPTON
HAMILTON
11
30
81
40
15
Substation
Alternative Routes
Sinkhole
Surface Depression
Limestone
Highway
Road
Forest Cover
Data Sources: Transource (2026), USGS Karst Map (2024), PADCNR Karst Features (2026), MGS Karst Features (2026), NLCD Forest Cover (2024)
Coordinate System: UTM Zone 18N NAD 83
N
May 11, 2026
Pennsylvania
Maryland
Figure 8a
Karst
Rice - Ringgold 230 kV Transmission Line Project
TRANSOURCE
0 1 2 3 4
Miles


A
B
C
Rice
Substation
(proposed)
Chambersburg
Waynesboro
Leitersburg
Ringgold Substation
Smithsburg
11
30
81
CUMBERLAND
FRANKLIN
ADAMS
GREENE
HAMILTON
GUILFORD
ANTRIM
QUINCY
WASHINGTON
HAMILTONBAN
PENNSYLVANIA
MARYLAND
FREDERICK
Substation
Alternative Routes
Prime Farmland
Highway
Road
Forest Cover
Data Sources: Transource (2026),
USDA/NRCS Soils (2025)
NLCD Forest Cover (2024)
Coordinate System:
UTM Zone 18N
NAD 83
May 11, 2026
Pennsylvania
Maryland
Figure 8b
Prime Farmland
Rice - Ringgold 230 kV
Transmission Line
TRANSOURCE
0 1 2 3 4
Miles

Water Resources

Streams

The Project Study Area is located primarily within the Conococheague Creek (USGS Hydrologic Unit 0207000408) and Antietam Creek watersheds (USGS Hydrologic Unit 0207000410) of the Potomac River Basin, with a portion of the northern extent located in the Conodoguinet Creek watershed (USGS Hydrologic Unit 0205030502) of the Lower Susquehanna-Swatara River in Pennsylvania and the Conocoheague-Opequan basin within both Pennsylvania and Maryland. Water Resources are identified in **Figures 9a and 9b.**

Pennsylvania

According to Pennsylvania Code, Title 25, *Water Quality Standards* (Chapter 93), PADEP has established narrative and numeric water quality criteria necessary to support a variety of protected water uses, which include protection uses for aquatic life (e.g., Cold Water Fishes [CWF], Warm Water Fishes [WWF], Trout Stocking [TSF], and Migratory Fishes [MF]) and special protection waters (e.g., High Quality [HQ] and Exceptional Value [EV]). PADEP assigns all streams in the Commonwealth a Designated Use, which is the water use goal for a particular stream segment, whether or not it is currently being attained. In contrast, a stream's Existing Use is the use actually attained by existing water quality. PADEP's antidegradation policy requires existing uses, and the level of water quality necessary to protect existing uses, shall be maintained and protected. As such, the water quality of a stream segment with an existing use that exceeds its designated use may not be degraded below the water quality levels protective of that existing use (PADEP 2026).

Further, the PFBC provides additional protection (i.e., seasonal restrictions) to streams that support trout populations. Streams listed as Approved Trout Stream (stocked) (PFBC 2026a), Class A Wild Trout Waters (PFBC 2026b), or Wild Trout Waters (Natural Reproduction) (PFBC 2026c) are also noted on **Table 2**. None of the streams are listed as Wilderness Trout Waters (PFBC 2023).

Table 2: Pennsylvania Water Quality Designations

Stream Name	Chapter 93 Designated Use	Chapter 93 Existing Use	Special PFBC Designations
Muddy Run	HQ-CWF, MF	N/A	Natural Trout Reproduction
Rowe Run	CWF, MF	N/A	Approved Trout Waters Portions – PFBC Stocked Trout Stream
Cold Spring Run	HQ-CWF	N/A	Portions – Natural Trout Reproduction

Table 2: Pennsylvania Water Quality Designations			
Stream Name	**Chapter 93 Designated Use**	**Chapter 93 Existing Use**	**Special PFBC Designations**
Antietam Creek	WWF, MF	N/A	N/A
East Branch Antietam Creek	CWF, MF	N/A	Portions – PFBC Stocked Trout Stream Portions – Natural Trout Reproduction
West Branch Antietam Creek	CWF, HQ-CWF, MF	N/A	Portions – PFBC Stocked Trout Stream Class A Wild Trout Portions - Natural Trout Reproduction
Conococheague Creek and Tributaries	WWF, CWF, HQ-CWF, MF	N/A	Portions – PFBC Stocked Trout Stream Portions – Natural Trout Reproduction
Falling Spring Branch of the Conococheague Creek	TSF, HQ-CWF, MF	N/A	Portions - Natural Trout Reproduction Portions – PFBC Stocked Trout Stream Class A Wild Trout
Mountain Run	CWF, MF	N/A	Natural Trout Reproduction
Phillaman Run	CWF, MF	N/A	N/A
Marsh Run	WWF, MF	N/A	N/A

Maryland

According to Code of Maryland Regulations (COMAR) Sections 26.08.02.02 and 26.08.02.02-1, Maryland Department of Environment (MDE) has established narrative and numeric water quality criteria necessary to support a variety of protected water uses, which include protection uses for aquatic life. These include:

- **Use Class I:** Water Contact Recreation, and Protection of Nontidal Warmwater Aquatic Life
- **Use Class I-P:** Water Contact Recreation, Protection of Aquatic Life, and Public Water Supply
- **Use Class II:** Support of Estuarine and Marine Aquatic Life and Shellfish Harvesting
- **Use Class II-P:** Tidal Fresh Water Estuary – includes applicable Use II and Public Water Supply
- **Use Class III:** Nontidal Cold Water
- **Use Class III-P:** Nontidal Cold Water and Public Water Supply
- **Use Class IV:** Recreational Trout Waters
- **Use Class IV-P:** Recreational Trout Waters and Public Water Supply

MDE assigns all streams in the State a Use Class, which is the water use goal for a particular stream segment, whether or not it is currently being attained (MDE 2026). A component of the designated use is the stream's Existing Use (EU). The EU is the use actually attained by existing water quality. Both Federal and MDE's State water quality standards requires existing uses, and the level of water quality necessary to protect existing uses, shall be maintained and protected (Code of Federal Regulations [CFR] Title 40 § 131.3 and § 131.12(a)). Use classes include consideration of existing conditions and potential uses which may be made possible by anticipated improvements in water quality (COMAR 2026a, COMAR 2026b, Legal 2015a, Legal 2015b).

Maryland also assesses streams based on the Antidegradation Regulations provided in COMAR Sections 26.08.02.04, 26.08.02.04-1, and 26.08.02.04-2 (COMAR 2026c). These regulations classify streams based on two tiers:

- **Tier 1** specifies the minimum standard that must be met—support of balanced indigenous populations and support of contact recreation—this is often referred to as "fishable-swimmable."
- **Tier 2** protects water that is better than the minimum specified for that designated use.

In Maryland, the Project Study Area is primarily located within the Antietam Creek, Little Antietam Creek, and East Branch Antietam Creek Watersheds. The majority of these stream segments include sections containing Use Classes III-P, IV-Pas noted on **Table 3**. All of these streams are classified as Tier 1 features.

Table 3: Maryland Water Quality Designations

Stream Name	Use Class	Antidegradation Tier	Antidegradation Catchment
Antietam Creek	Use Class IV-P	Tier I	Tier I
Little Antietam Creek	Use Class III-P	Tier I	Tier I
Unnamed Tributaries to East Branch Antietam Creek	Use Class IV-P	Tier I	Tier I
Beaver Creek	Use Class III-P	Tier I	Tier I
Grove Creek	Use Class III-P	Tier I	Tier I
Marsh Run	Use Class III-P	Tier I	Tier I

Wetlands

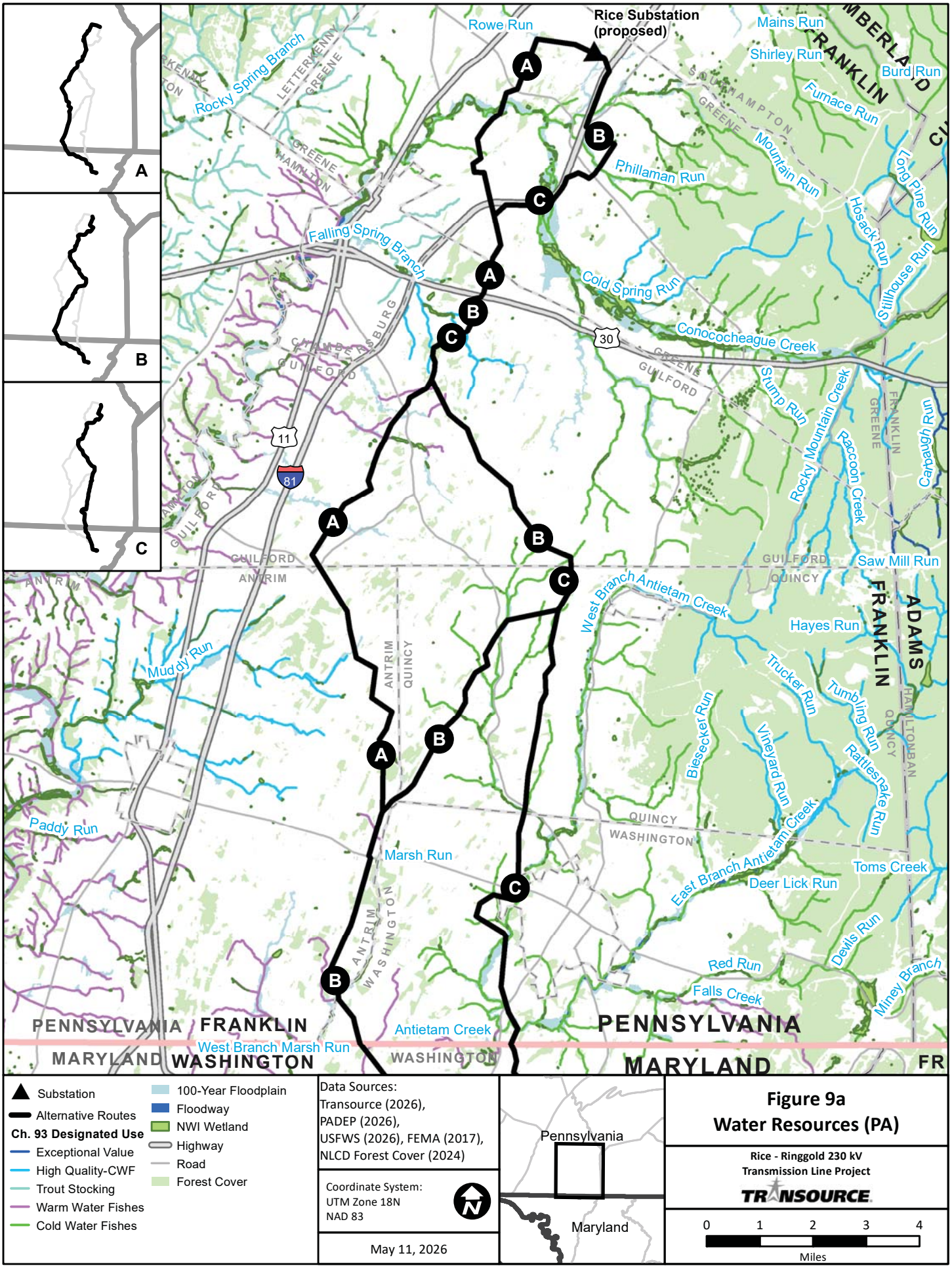
Review of the USFWS National Wetlands Inventory (NWI) mapping indicates numerous small wetlands exist throughout the Project Study Area. These wetlands primarily exist next to streams and within floodplain areas as palustrine wetlands. Palustrine systems include all non-tidal vegetated wetlands and are further classified based on the dominant plant type. These classifications include palustrine emergent (PEM) herbaceous systems, palustrine scrub-shrub (PSS) systems, and palustrine forested (PFO) systems (USFWS 2026).

Maryland has also identified specific nontidal wetlands within the state that exhibit exceptional ecological and educational value. These Wetlands of Special State Concern are the best examples of Maryland's nontidal wetland habitats and are designated for special protection under the State's nontidal wetlands regulations. Many of these special wetlands contain the last remaining populations of native plants and animals that are now considered rare and threatened (MDNR 2026a). One Wetland of Special State Concern is located with the Project Study Area, and none of the routes cross this Wetland of Special State Concern.

Floodplains and Floodways

One hundred year floodplains are areas adjacent to streams which would be inundated by a flood elevation that has a 1-percent chance of being equaled or exceeded each year. The Federal Emergency Management Agency (FEMA) delineates the extent of most 100-year floodplains. Floodplains are located primarily along main branch named streams within the Project Study Area (FEMA 2026). Floodways are the channel of a watercourse and the adjacent land areas that must be reserved in order to discharge the base flood without cumulatively increasing the water surface elevation more than a designated height. FEMA defines these regulatory floodways. Floodways are located primarily within the channel of main branch named streams within the Project Study Area (FEMA 2026).

Streams, wetlands, floodplains and floodways within the Project Study Area are identified in **Figures 9a (Pennsylvania) and 9b (Maryland) – Water Resources**.



Substation
Alternative Routes
Ch. 93 Designated Use
Exceptional Value
High Quality-CWF
Trout Stocking
Warm Water Fishes
Cold Water Fishes
100-Year Floodplain
Floodway
NWI Wetland
Highway
Road
Forest Cover

Data Sources:
Transource (2026),
PADEP (2026),
USFWS (2026), FEMA (2017),
NLCD Forest Cover (2024)

Coordinate System:
UTM Zone 18N
NAD 83

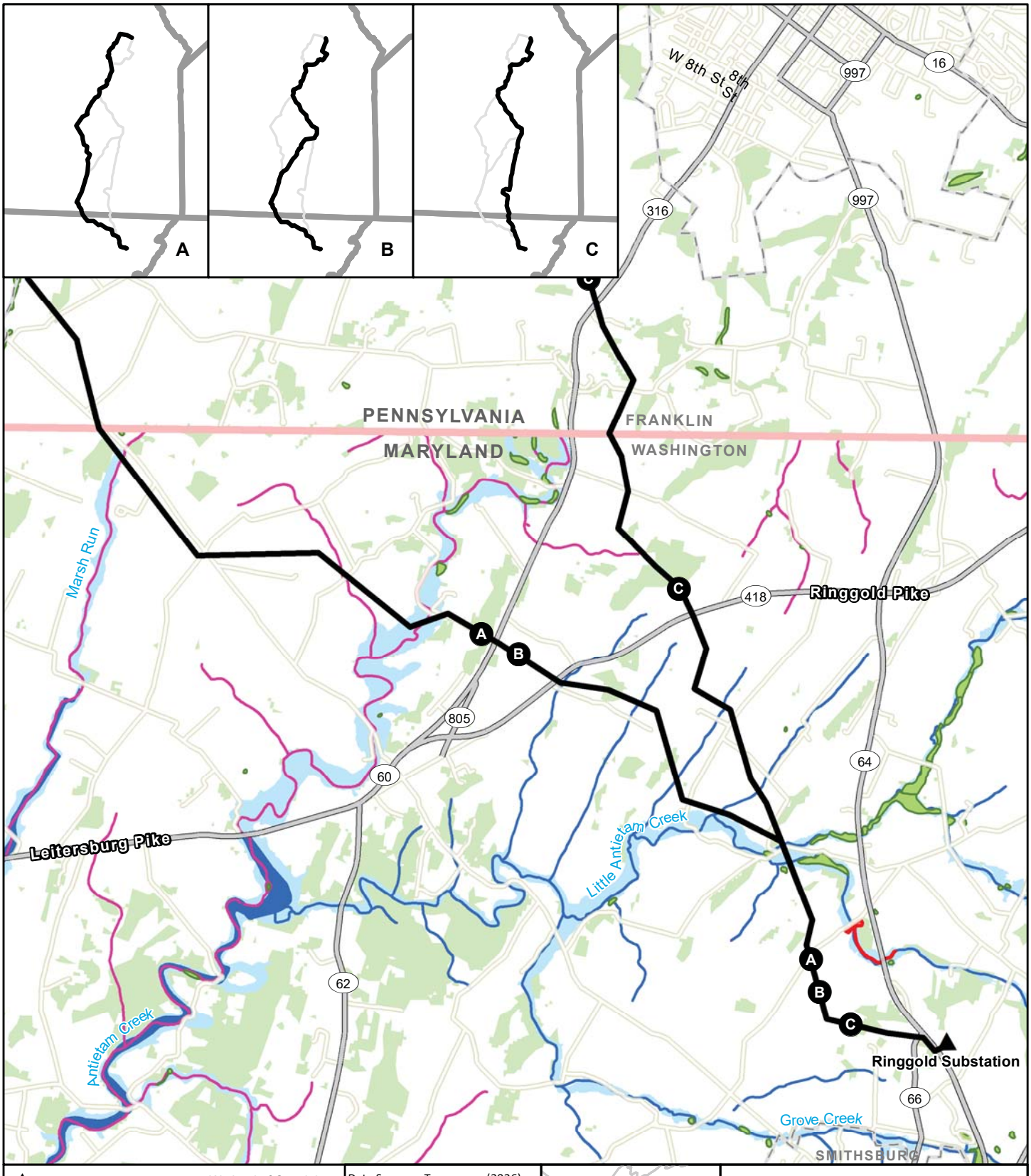
May 11, 2026

Figure 9a
Water Resources (PA)

Rice - Ringgold 230 kV
Transmission Line Project

TRANSOURCE

0 1 2 3 4
Miles



Substation
Alternative Routes
Class III-P: Nontidal Cold Water and Public Water Supply
Class IV-P: Recreational Trout Waters and Public Water Supply
Wetland of Special Concern
NWI Wetlands
100-Year Floodplain
Floodway
Major Roads
Streets
Forest Cover

Data Sources: Transource (2026), MDE (2026), DNR (2025), USFWS (2026), FEMA (2017), NLCD Forest Cover (2024)

Coordinate System:
UTM Zone 18N
NAD 83

May 11, 2026

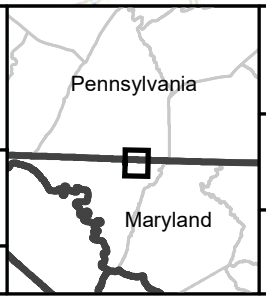


Figure 9b
Water Resources (MD)

Rice - Ringgold 230 kV
Transmission Line Project

TRANSOURCE

0 0.25 0.5 0.75 1
Miles

Alternative Route Comparison

Most of the streams crossed in the northern portion of the Project Study Area in Pennsylvania are classified by PADEP as Cold Water Fishes (CWF) and Warm Water Fishes (WWF) tributaries to Conococheague Creek, which flows through Chambersburg and then south into Maryland. Both of these stream classifications do not receive any special protection by PADEP beyond maintaining their designated use for cold water or warm water fish species. A few tributaries in this area are classified as High Quality (HQ) due to their above average water quality and are thereby eligible for special protection. These streams are usually associated with natural springs that are flowing from the karst limestone bedrock (e.g., Cold Spring Run, Falling Spring Branch). Both of these HQ streams are also considered Wild Trout Waters by the PFBC, which provides additional protective measures.

In central portions of the Project Study Area, the routes extend into the Antietam Creek watershed, which also flows south into Maryland. Most of these streams are also classified as CWF and WWF, but there are no HQ streams in this part of the watershed.

At its southern extent, the Project continues along within the Antietam Creek watershed as it extends into Maryland, where it is listed as a Tier I (minimum standard) stream by MDNR. While many of these streams are not considered special protection, most of these watersheds are classified by MDNR as Use Class III-P (Nontidal Cold Water and Public Water Supply) or Use Class IV (Recreational Trout Waters), which provides them with addition protection due to their social services and ecological values.

Alternative Route A crosses the least number of streams (17) as this option extends through lower sections of the Conococheague Creek and Antietam Creek valleys, where there are fewer, but wider stream features. Alternative Route B shares the most crossings of special protection streams (2), while Alternative A and C will cross one (1) special protection stream. All of these crossings are associated with the HQ-classified Falling Spring Branch watershed, which is located near Chambersburg. Alternative Route C would cross the second fewest streams (22) and span the HQ-classified Falling Spring Branch stream only once, while Alternative Route B crosses the most streams at 25.

Impacts to wetlands by the Alternative Routes are limited due to the few NWI-identified wetland resources in the Project Study Area. In most cases, the transmission line alignment can be engineered to span over the wetland areas thus having limited effect on PEM or PSS wetlands. PFO wetlands however would be affected by the removal of the trees within the 130-foot wide ROW. No permanent structures or other sources of fill are anticipated in any wetland but the use of timber matting for temporary access road crossings may be required in certain situations.

Alternative Route A would not cross any PFO wetlands, but Alternative Routes B and C would cross the same 0.9 acre PFO wetland area. Overall, considering both PEM, PSS, and PFO wetlands Alternative Routes A and B would cross the most wetland area (1.3 acre) in total and Alternative Route C would cross the least total wetland area (1.0 acre).

FEMA floodplains in the Project Study Area are fairly common due to the level terrain of the Conococheague and Antietam Creek valleys, which allows for floodwaters to more easily overflow their banks. These floodplains primarily consist of narrow buffers along streams and are not wide resources. Placement of a transmission line structure within a floodplain area would need to be approved by the state regulatory agencies as changes to the hydrology of floodwaters may affect properties downstream. As with wetlands, the alignment of the transmission line can usually be engineered to span floodplain areas, with the potential impact being constrained to tree clearing. Alternative Route A would cross the least floodplain area (20.6 acres) (along with the fewest streams) while Alternative Route B would cross the most floodplain areas (26.9 acres). Alternative Route C would encounter the second most floodplain areas (23.1 acres) but the only floodway area (0.9 acre), which defines the area of concentrated floodwater flow and protected by the regulatory agencies to avoid potential modifications in flooding behaviors. No structures will be built within the floodway areas of any stream, which will mitigate any potential impact.

In Maryland, the area adjacent to a stream corridor is also considered by the state regulatory agencies as a riparian buffer to the stream that provides water quality protection and habitat area. Although trees within the riparian area may be cleared, lower growing vegetation would be allowed to grow. Alternative Routes A and B would result in the most riparian impacts (1.7 acre) as these alignments extend from west to east toward the Ringgold Substation and across a longer section of the state, whereas Alternative Route C would have limited riparian buffer impact (0.6 acre) as it would have a shorter north to south alignment across the state of Maryland, and follows an existing utility corridor which crosses these streams in areas where the riparian vegetation has already been cleared and typically maintained in an herbaceous or scrub-shrub state.

Wetland and floodplain impacts will be minimized to the best extent practicable by spanning these resources where feasible. Streams will always be spanned by the transmission line, but some minor crossings may be required for permanent or temporary access roads. These stream access road crossings will be avoided where possible, but where deemed required it will be designed and permitted under the direction of the federal and state agencies.

4.1.2 Wildlife Habitat and Sensitive Species

Resource Characteristics

Typical wildlife species found within the Project Study Area include those found in wetlands, forested habitats, and open/agricultural lands. These habitats contain a diverse population of amphibians, fish, reptiles, birds and mammals. Common mammals within these habitats include raccoon (*Procyon lotor*), opossum (*Didelphia virginiana*), fox (*Vulpes vulpes*), skunk (*Mephitis mephitis*), porcupine (*Erethizon dorsatum*), and white-tailed deer (*Odocoileus virginianus*). More isolated regions such as Michaux State Forest may also contain black bears (*Ursus americanus*), beaver (*Castor canadensis*), and bobcat (*Lynx rufus*).

Important Bird Areas (IBA) are internationally recognized, scientifically identified sites critical for the conservation of bird populations worldwide. The Project Study Area does extend into the South Mountain – Caledonia State Park and Michaux State Forest and Maryland Blue Ridge IBAs that run north to south along the eastern portion of the Project Study Area (National Audubon Society 2026). These areas are the northernmost section of the Blue Ridge Mountains in Pennsylvania and Maryland and contain interior forest that attracts several species of migratory species, as well as waterfowl and wading birds. Many foot trails exist within the state forest area, and several rock outcroppings provide views of raptors during the fall migration season.

The Project Study Area contains a diverse range of habitat, and therefore, has the potential to host a number of different types of threatened and endangered (T&E) species. These may include species of plants, birds, fish, mammals, bats, insects and spiders, reptiles and amphibians, or mussels.

A review of the PADCNR and MDNR Natural Heritage Program Databases will be conducted during the permitting process to determine the potential presence of T&E species along the Proposed Route. Specifically, the Pennsylvania review of the Natural Heritage Program Databases would evaluate for federal (USFWS) and state (PADCNR, PFBC and PGC) listed species. In Maryland, an initiation letter would be submitted to MDNR and USFWS to commence Project specific consultation. Within both states, further coordination with these federal and state agencies will be required to obtain route alignment specific T&E species data.

Based on review of the *Natural Areas Inventory of Franklin County, Pennsylvania* (The Nature Conservancy 2004) and the MDNR *List of Rare, Threatened, and Endangered Species of Washington County* (MDNR 2019), several animal and plant species of concern may be located in the Project Study Area.

Natural Areas - Pennsylvania

Natural Areas in Franklin County were surveyed by the Pennsylvania Science Office of The Nature Conservancy (TNC) and are outlined in the Natural Area Inventories (NAI) of Franklin County. The NAI provides maps and detailed information concerning locations of known outstanding natural features, flora, fauna, and geology in Franklin County, Pennsylvania. These sites represent good examples of rare habitat that support an uncommon diversity of plant and wildlife habitat. In addition, the PADCNR also identifies specific wild and natural areas within their state park or state forest systems that are also based on special ecological conditions or the presence of uncommon plants or animals. PADCNR has indicated that South Mountain and Michaux State Forest contain some unique areas that provide habitat for several listed species.

Table 4 below provides a list of the TNC and PADCNR identified natural areas within the Project Study Area in Franklin County, Pennsylvania. These areas are illustrated in **Figure 10.**

Table 4: Natural Areas within the Project Study Area - Pennsylvania

TNC-Identified		
Name	**Description**	**Proximity to Alternative Routes**
Antietam West Branch	Contains a State endangered bird species of concern, with past breeding observed at the site.	Crossed by Alternative Route C
Falling Spring	Site contains a species of concern.	Crossed by Alternative Routes A, B, and C
Mountain Run, Stillhouse Hollow Ponds	Contains a number of excellent quality vernal pools, as well as several plant species of concern.	1.0 mile east of Alternative Routes B and C
Muddy Run Spring	Contains a population of an animal species of concern.	0.7 miles southwest of Alternative Route A
Muskrat Fen	Located along the Conococheague Creek and contains a relatively uncommon fen habitat. Contains four plant species of concern.	0.9 mile east of Alternative Routes B and C
Nunnery Spring	Contains a population of State animal species of concern in a spring fed stream in an agricultural and residential setting.	0.9 mile east of Alternative Route C

Table 4: Natural Areas within the Project Study Area - Pennsylvania		
TNC-Identified		
Name	**Description**	**Proximity to Alternative Routes**
Siberia	Contains a PA threatened plant species, as well as several natural communities supporting a diverse, interesting flora.	2 miles west of Alternative Route A
Waynecastle Old Field Habitat	Contains a good population of a number of State listed plant species of concern.	Crossed by Alternative Routes A and B
Zullinger Spring	Contains a State animal species of concern in a tributary to the West Branch Antietam Creek.	Crossed by Alternative Route C

Natural Areas - Maryland

Natural Areas in Maryland were surveyed by MDNR. MDNR lists one natural area in Washington County, which exists outside of the Project Study Area (MDNR 2026b), therefore, no Natural Areas are within the Project Study Area in Washington County, Maryland.

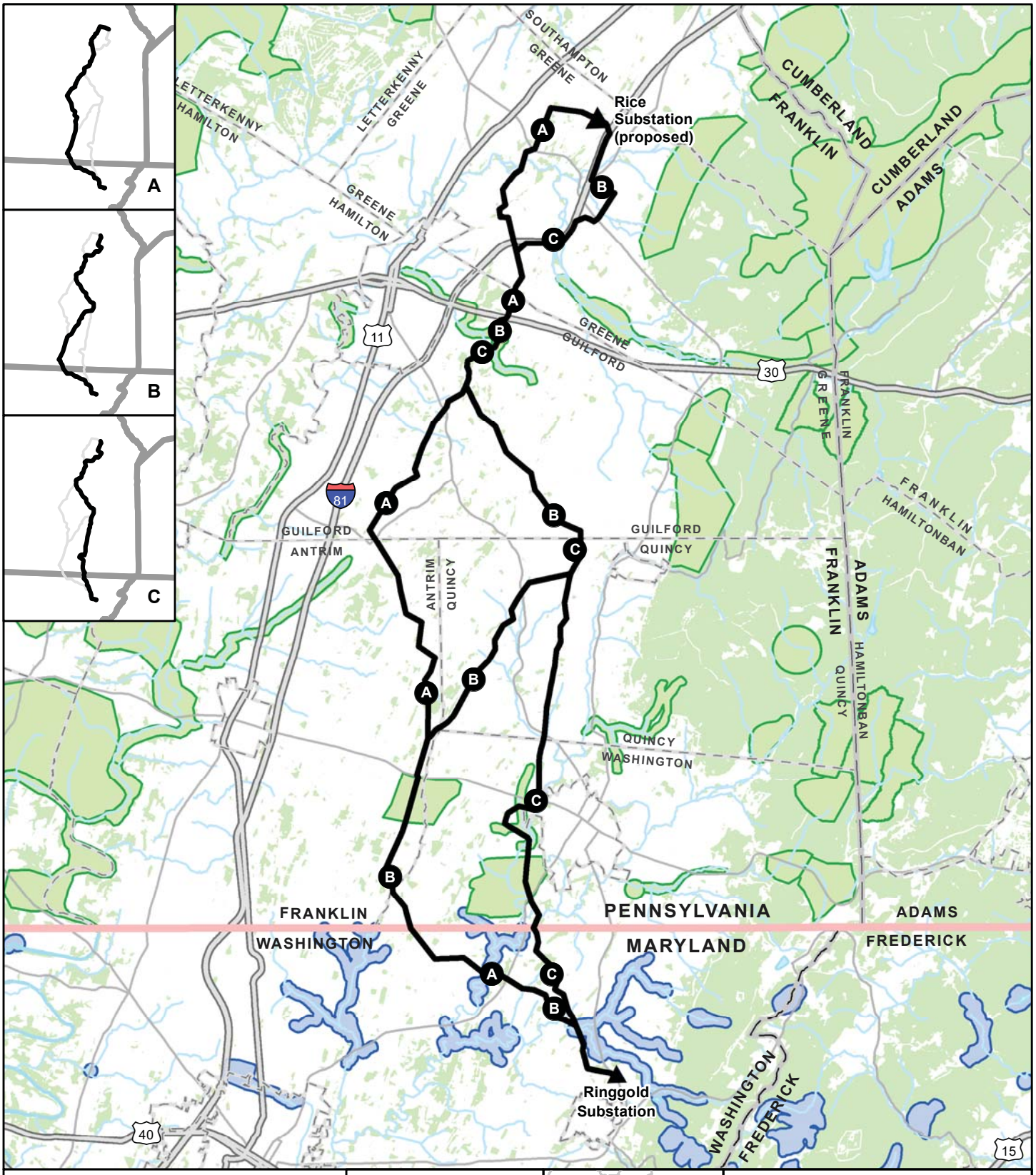
MDNR does provide potential T&E habitat information through its Sensitive Species Project Review Areas (SSPRA), which is a GIS based search website that illustrates polygons of potential habitat areas (MDNR 2021). These polygons are categorized by groups, with Group 1 habitat areas being focused on federally listed species, Group 2 being focused on state listed species, Group 3 being composed of species of concern to MDNR, and Group 4 being related to bald eagle nests. Review of the SSRPA data indicates that four Group 2 and one Group 3 polygons around stream networks exist within the Project Study Area. These habitat areas are illustrated in **Figure 10.**

Alternative Route Comparison

While the potential for T&E species is known whether the specific habitat will be impacted will not be known until after the Proposed Route alignment is field reviewed and habitat assessments are completed in support of federal and state permitting. The data used in the Siting Study provides information on identified natural areas that contain habitat to support some of these species and were used as guides for routing the Study Segments. As illustrated in **Figure 10**, potential T&E habitat is focused along several of the main water courses extending across the Project Study Area and in scattered points throughout the area, making avoidance of these sensitive areas difficult.

Crossing through TNC-identified natural areas in Pennsylvania or the sensitive species polygons in Maryland does not dictate that an impact will occur, however, the potential of encountering T&E species or their habitat may be higher in these areas. Based on the analysis, although Alternative Routes A and B would cross the least acreage of natural areas (37.2 acres), all the Alternative Routes parallel existing infrastructure through these predominantly non-forested natural areas and can therefore span potential T&E habitat. None of the Alternative Routes are anticipated to cause significant impacts to these natural areas, as existing land use has led to fragmentation of forest within the natural areas, and the line would minimally add to that fragmentation. Although Route C crosses the most acreage of natural areas (43.2 acres), it poses less new impact by paralleling existing transmission ROWs through these areas, more so than Route A or B which would introduce a new utility ROW.

All required federal and state agency consultations would be completed for the Proposed Route to determine final species habitat locations and requirement for specifies specific surveys. Coordination will ensure whether areas can be avoided, or where appropriate, timing restrictions applied to construction activities to avoid impact during breeding or roosting seasons.



- Substation
- Alternative Routes
- MD Sensitive T&E Area
- PA Core Habitat of Biological Diversity Area
- Highway
- Road
- Stream
- Forest Cover

Data Sources: Transource (2026), Western PA Conservancy (2014), PASDA (2026), MD DNR (2026), NLCD Forest Cover (2024)

Coordinate System: UTM Zone 18N NAD 83

May 11, 2026



Figure 10 - Threatened and Endangered Habitat

Rice - Ringgold 230 kV Transmission Line Project

TRANSOURCE

0 1 2 3 4

Miles

Table 5: Natural Resource Evaluation Criteria				
Alternative Route	**Unit**	**A**	**B**	**C**
General				
Length	miles	**30.** PA: 23.5 MD: 6.6	**31.0** PA: 24.4 MD: 6.6	**27.9** PA: 23.5 MD: 4.4
Water Resources				
Total streams crossed	count	**17** PA: 8 MD: 9	**25** PA: 16 MD: 9	**22** PA: 18 MD: 4
High/Exceptional/Special Protection streams crossed	count	**1** PA: 1 MD: 0	**2** PA: 2 MD: 0	**1** PA: 1 MD: 0
Riparian buffers crossed - Applicable to MD (25 foot buffer) - Not applicable to PA	acres	**1.7** PA: 0.0 MD: 1.7	**1.7** PA: 0.0 MD: 1.7	**0.6** PA: 0.0 MD: 0.6
Forested wetlands in the ROW (NWI)	acres	**0**	**0.9** PA: 0.9 MD: 0.0	**0.9** PA: 0.9 MD: 0.0
PEM/PSS wetlands in the ROW (NWI)	acres	**1.3** PA: 1.3 MD: 0.0	**0.4** PA: 0.4 MD: 0.0	**0.1** PA: 0.1 MD: 0.0
FEMA-designated floodplain crossed by ROW	acres	**20.6** PA: 13.2 MD: 7.4	**26.9** PA: 19.5 MD: 7.4	**23.1** PA: 21.1 MD: 2.0

Table 5: Natural Resource Evaluation Criteria				
Alternative Route	**Unit**	**A**	**B**	**C**
FEMA-designated floodway crossed by ROW	acres	**0**	**0**	**0.9** PA: 0.9 MD: 0.0
Geological, Topographical, and Soil Resources				
Prime and unique farmland soil in the ROW [1]	acres	**307.7** PA: 265.9 MD: 41.8	**308.2** PA: 266.4 MD: 41.8	**245.9** PA: 212.7 MD: 33.2
Karst topography in the ROW (represents acres of Dolomite or Limestone within a segment ROW (karst-derived geology)	acres	**461.3** PA: 368.9 MD: 92.4	**464.5** PA: 372.1 MD: 92.4	**404.2** PA: 344.9 MD: 59.3
Other karst features (i.e., sinkholes, surface depressions, underground springs) in the ROW	count	**33** PA: 32 MD: 1	**32** PA: 31 MD: 1	**29** PA: 29 MD: 0
Wildlife and Habitat				
Threatened, endangered, rare or sensitive species targeted areas within the ROW	acres	**37.2** PA: 25.4 MD: 11.8	**37.2** PA: 25.4 MD: 11.8	**43.2** PA: 36.8 MD: 6.4

PA: and MD: = State specific impact breakdown.

[1] Prime farmland is land that has the best combination of physical and chemical characteristics for producing crops

4.2 Land Use

Potential land use impacts considered in the siting process included proximity of Alternative Routes to residential, commercial and industrial development, institutional uses (e.g., schools, places of worship, cemeteries, and hospitals), cultural resources, and overall land use of the area. A comparison of the land use considerations for the Alternative Routes is presented at the end of this section in **Table 8.** Land use within the Project Study Area is shown in **Figure 11.**

4.2.1 Agricultural and Forestry Resources

Resource Characteristics

Forestry

Upland forest communities once dominated the natural landscape within the Project Study Area. However, over time the natural land cover has become highly modified by agricultural uses. Land use within the Project Study Area consists of agricultural, woodlands, residential, commercial and industrial uses. Agricultural lands make up approximately half of the land use with pasture accounting for 10% and crop land accounting for 40%. Residential, commercial and industrial land uses account for approximately 30% of the area while woodlands make up the remaining 20%.

Forests throughout the Project Study Area are fragmented and scattered, with the exception of concentrated forested area along the steep slopes of South Mountain to the east, portions of which are part of Michaux State Forest. Forests in the region are comprised of two main types, Appalachian Oak forests, which are dominated by oaks and other hardwood species, such as black birch red maple, black gum, and hickories, and a smaller percentage of Oak/Hickory/Pines forests, which are dominated by broadleaf deciduous and needle-leaf evergreen trees, such as hickory, Virginia pine, pitch pine, chestnut oak, and black oak (The Nature Conservancy 2004).

In both Pennsylvania and Maryland, some of the forests are preserved within State and county agricultural preservation programs. In Maryland, additional protection to forests is given through the Maryland Forest Conservation Act in order to reduce the loss of forest cover due to development and improve water quality (MDNR 1997). In addition, Washington County, Maryland has instituted a Forest Conservation Ordinance in order to further protect forests by requiring mitigation for forest disturbance (Washington County, MD 2014).

Alternative Route Comparison

Forest clearing concerns from an environmental perspective focus on fragmentation, which reduces the viability of a forest ecosystem through the possible introduction of invasive plant species and changes in the wildlife community dynamics. Trees are also specifically tied to the habitat requirements of several T&E bat species, which use trees for roosting at night during the

summer. Clearing trees may have a direct impact on potential bat habitat, thus the less tree clearing required, the less possibility of creating a T&E impact. Tree clearing impacts were assessed by digitizing forested areas from recent aerial photography. All Alternative Routes would require similar tree clearing, ranking from Route A (66.2 acres) with the most, Route B (54.6 acres), to the least amount required along Route C (49.8 acres). Therefore, each of the routes may involve overall potential impacts to the T&E bat species, though Alternative Route C would pose the least impact. Fragmentation of forest habitat was minimized through paralleling existing infrastructure, where feasible.

Agricultural Preservation

Agricultural land is a predominant characteristic of the land use in the Project Study Area, with greater concentration on the flatter topography between the Appalachian Mountains to the west and South Mountain to the east. Agricultural lands are predominantly used for row crops, with other areas used as pasture for dairy cattle. A number of orchards also exist across the Project Study Area. The majority of these agricultural lands are associated with single farm complexes that may consist of several hundred acres.

Within the Project Study Area, prime agricultural soils accounts for approximately 33% of the soils in Franklin County, Pennsylvania (Franklin County 2012), and approximately 43% of the soils in Washington County, Maryland (USDA, NRCS 2003). Both States and counties institute agricultural preservation programs in order to preserve agricultural uses of high quality farmland. Both Maryland and Pennsylvania offer agricultural preservation easement initiatives in order to preserve the integrity of the local farmland by precluding the development or improvement of a parcel for a purpose other than agricultural uses. **Figure 12** depicts those parcels that have agricultural easements traversed by the Alternative Routes.

Pennsylvania

In Pennsylvania, the State easements are typically managed by the county. In Franklin County, agricultural easements are purchased at the county level and approved by the State. Farms within Agricultural Security Areas (ASA) may apply for easement purchase. ASAs are a State program whereby a number of adjacent participating farms join together to form an area consisting of a minimum of 250 acres in which participants receive special protection regarding local ordinances affecting farming activities, nuisance complaints, and review of farmland condemnation by state and local government agencies. A farm must be part of an ASA to qualify for consideration in the Easement Purchase Program. In Franklin County, easements are purchased through the Franklin County Agricultural Land Preservation Board (FCALPB). The FCALPB oversees the terms and conditions of the permitted agricultural activities, as well as restrictions that are established by an easement. Such restrictions include development of buildings and other structures,

subdivision, mining, rural enterprises, and soil and water conservation (FCALPB 2024). Utilities are a permitted use within the FCALPB easements.

Within Franklin County, and the limits of the Project Study Area, the USDA/NRCS holds a few agricultural easements through their Agricultural Conservation Easement Program (ACEP), formerly referred to as the Farm and Ranch Lands Protection Program (FRPP). Alternative Route B crosses one of these USDA/NRCS easements. No other Alternative Routes cross these USDA/NRCS easements in Pennsylvania.

Maryland

In Maryland, there are two ways to preserve farmland: easement donation and easement sale. Easements may be purchased by both State and county governments. Easements may be donated through the Maryland Environmental Trust (MET), which is a component of the MDNR. MET easements are highly customizable to the type of preservation applicable to the individual tract of land and regulate the type of development permitted. This type of easement is considered a charitable donation that may be deducted from Federal income taxes (MDNR 2026c).

Easements in Maryland may be sold through a number of means. Washington County has instituted the Washington County Agricultural Land Preservation District, by which the county purchases the development rights to an agricultural property for a period of ten years. Once a part of this program, a farm is eligible to sell development rights through the Maryland Agricultural Land Preservation Program (MALPP), receive tax credits, and be protected from nuisance complaints (Washington County 2018). An easement may also be sold through the Maryland Agricultural Land Preservation Foundation's (MALPF) MALPP, the Maryland Rural Legacy Program, or the GreenPrint Program. The MALPF is a part of the Maryland Department of Agriculture (MDA) and places restrictions on development on Prime Farmland and woodland, permanently preserving the property for agricultural use. MALPF will purchase an easement that will remain in perpetuity on the property deed (MDA 2026). The Maryland Rural Legacy Program (MRLP) is a part of the MDNR and provides funding to preserve large tracts of land through public-private partnerships in order to allow local land trusts and governments to enhance natural resources, agriculture, forests and the environment. These easements protect the most ecologically valuable resources that impact the Chesapeake Bay and local waterways (MDNR 2026d). Easements may also be sold through the GreenPrint Program, which is an initiative of the MDNR that designates Targeted Ecological Areas (TEAs) that have high ecological value, and targets adjacent lands for acquisition and easements (MDNR 2026e).

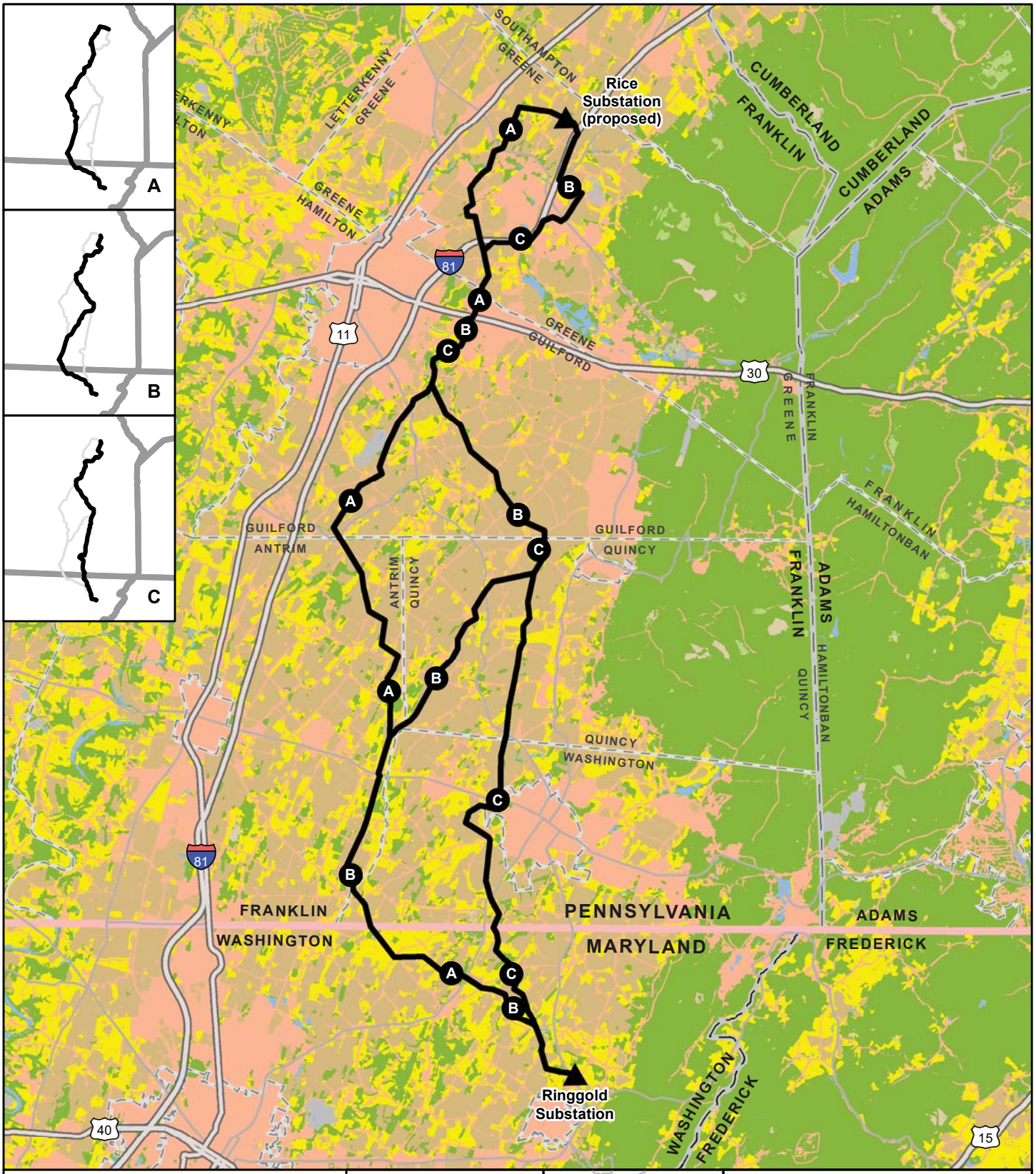
In the limits of the Project Study Area in Washington County, there are two USDA/NRCS agricultural ACEP easements, neither of which are crossed by any of the Alternative Routes.

Alternative Route Comparison

Agricultural lands are a dominant component of the landscape in the Project Study Area and many of these lands are protected from development through agricultural easements. Removal of the development rights of these lands was encouraged to maintain the viability of the farms by eliminating outside pressures to sell land for residential or commercial development. In Pennsylvania, the state easements used by Franklin County for the agricultural preservation allow for transmission line crossings. In most cases, the agricultural easement language does not restrict the ability of an electric transmission line to cross these lands; placement of the structures on a preserved property is not considered development as it does not remove the ability of the landowner to use the land under the transmission lines for agricultural purposes. In general, Alternative Routes were sited to minimize impacts to farming operations by paralleling the edge of fields or through placement of structures at access road locations, where possible. Alternative Route A would cross the least agricultural easement (32.5 acres), Alternative Route B would cross the most (69.2 acres), whereas Alternative Route C crosses a smaller amount (55.2 acres) compared to Alternative Route B.

Information provided by the farm landowners crossed by the various Study Segments highlighted that using pasture or rangeland would be considered less intrusive on farm operations than crossing over croplands. Pasture and rangeland often consist of landscape elements, such as rock outcrops or steeper slopes, which restrict the land use to cattle or horse grazing and that structure placement in these fields has limited effect on the agricultural use. Croplands involve more comprehensive attention through plowing, planting, and harvesting processes that require direct access to most of the area throughout the growing season. Through the siting process, alignment shifts were made to maximize the use of pasture lands and minimize crossing croplands, where feasible. Routing the transmission line along parcel boundaries and fields were feasible, also helped to reduce overall potential impacts. Overall Alternative Route A would cross the most pasture land (86.1 acres) and Alternative Route C would cross the least (53.5 acres). Review of the cropland data notes that all of the routes would cross a considerable number of acres with Alternative Route C crossing the most (307.6 acres) and Alternatives Route A and B crossing less cropland (281.8 and 293.2 respectively).

Numerous orchards are located throughout the Project Study Area. Typically, orchards can still grow within the transmission line ROW, and structures can be engineered to meet appropriate clearances. Orchard tree species are typically restricted to around 15 feet. As with croplands, the siting process worked to place alignments in areas across an orchard where structures may be located near access roads or along the edge of a section, thereby reducing the potential loss of trees and minimizing the effect of the structures on the orchard operations. Alternative Route A crosses the most orchard area (10.4 acres). Alternative Route B crosses the fewest acres of orchards (4.8 acres), while Alternative Route C crosses the second most acres (6.2).



Substation
Alternative Routes
Water/Wetlands
Developed
Barren Land
Forest
Shrub/Scrub
Grassland/Herbaceous
Pasture/Hay
Cultivated Crops
Highway
Road

Data Sources: Transource (2026), NLCD Land Use Land Cover (2024)

Coordinate System:
UTM Zone 18N
NAD 83

May 11, 2026

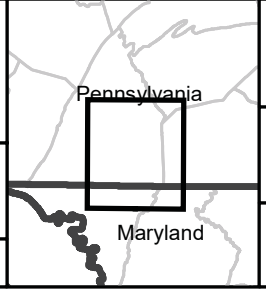
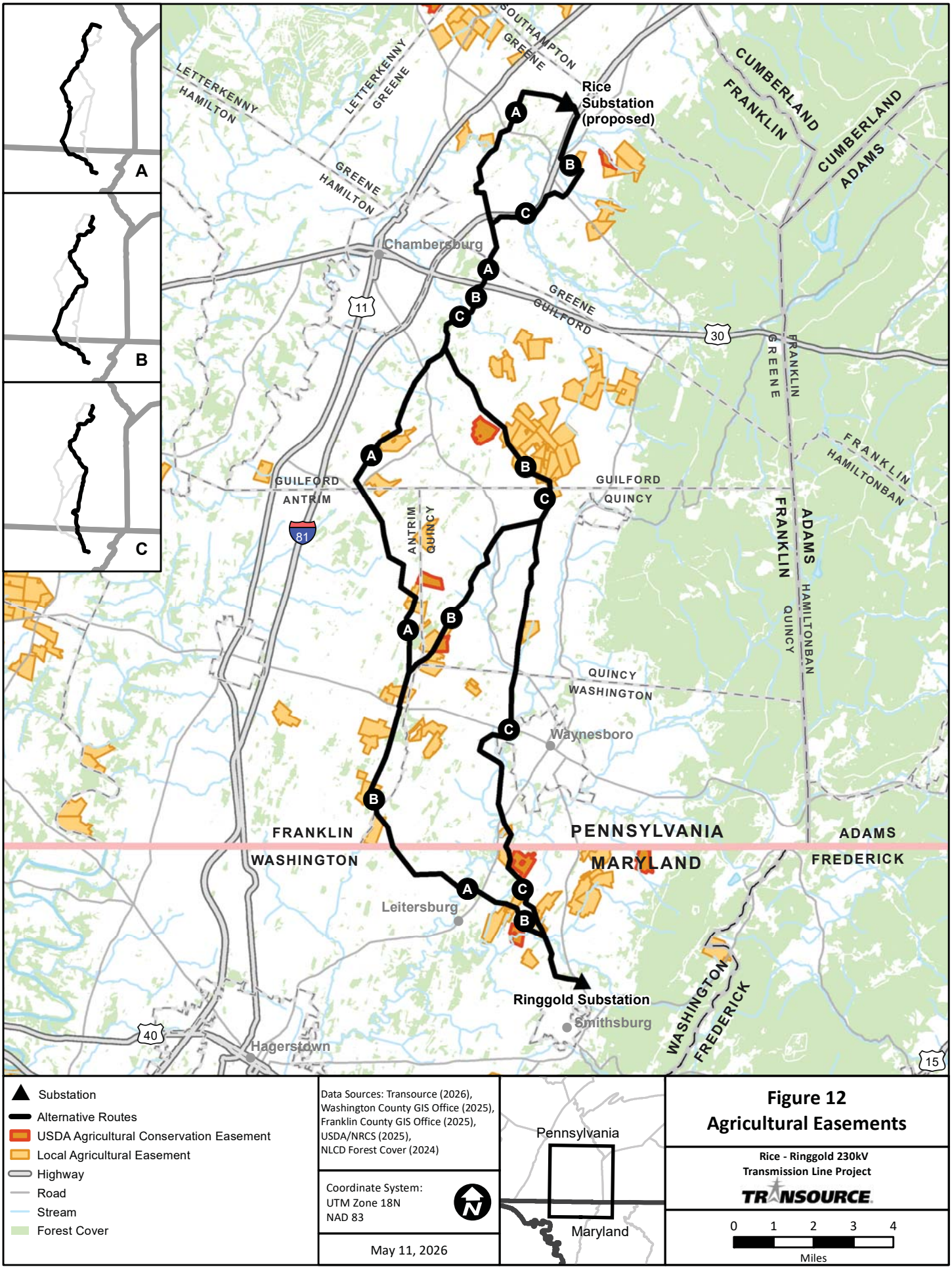


Figure 11
Land Use

Rice - Ringgold 230 kV Transmission Line Project

TRANSOURCE

0 1 2 3 4
Miles


A
B
C
Rice Substation (proposed)
Ringgold Substation
Chambersburg
Waynesboro
Leitersburg
Smithsburg
Hagerstown
PENNSYLVANIA
MARYLAND
FRANKLIN
WASHINGTON
ADAMS
FREDERICK
GUILFORD
ANTRIM
QUINCY
GREENE
HAMILTON
LETTERKENNY
SOUTHAMPTON
CUMBERLAND
FRANKLIN
ADAMS
HAMILTONBAN
11
30
81
40
15
Substation
Alternative Routes
USDA Agricultural Conservation Easement
Local Agricultural Easement
Highway
Road
Stream
Forest Cover
Data Sources: Transource (2026), Washington County GIS Office (2025), Franklin County GIS Office (2025), USDA/NRCS (2025), NLCD Forest Cover (2024)
Coordinate System: UTM Zone 18N NAD 83
N
May 11, 2026
Pennsylvania
Maryland
Figure 12
Agricultural Easements
Rice - Ringgold 230kV Transmission Line Project
TRANSOURCE
0 1 2 3 4
Miles

4.2.2 Recreation and Conservation Lands

Resource Characteristics

Recreation and Conservation Lands are typically defined as government owned or controlled lands that are publicly accessible and provide special conservation value and social service. Scenic vistas, wilderness areas, state game lands, and public parks are several examples of these lands. Recreational areas are depicted in **Figure 13**.

Wilderness Areas

The National Wilderness Preservation System (NWPS) preserves wild lands with the highest level of government protection, and includes National Forests, National Parks, National Wildlife Refuges, and Bureau of Land Management (BLM) lands. The Project Study Area does not contain lands managed by the National Wilderness Preservation System (NWPS 2026).

Pennsylvania

State Lands

Portions of Michaux State Forest are within the Pennsylvania section of the Project Study Area. Michaux State Forest consists of more than 85,500 acres in the area of South Mountain and includes public use facilities and trails (PADCNR 2026c).

There are no Pennsylvania State Game Lands within the Project Study Area (PGC 2026). Two Pennsylvania state parks, Caledonia and Mont Alto, are located along the eastern perimeter of the Project Study Area (PADCNR 2026d).

There are a number of small local community parks throughout the Project Study Area. These parks are primarily located in more densely developed areas and serve local communities. Specific examples include Norlo Park in Guilford Township and Greene Township Park.

Maryland

Wildlife Management Areas

In Maryland, Wildlife Management Areas (WMA) are managed by the Wildlife and Heritage Service. WMAs are established in order to maintain, enhance, create, and preserve, and protect diverse wildlife populations and their habitat (MDNR 2026f). The Project Study Area is not located within a WMA in Washington County, Maryland (MDNR 2026g).

State Parks

In Washington County, Maryland, there are no State parks within the Project Study Area (Maryland 2017).

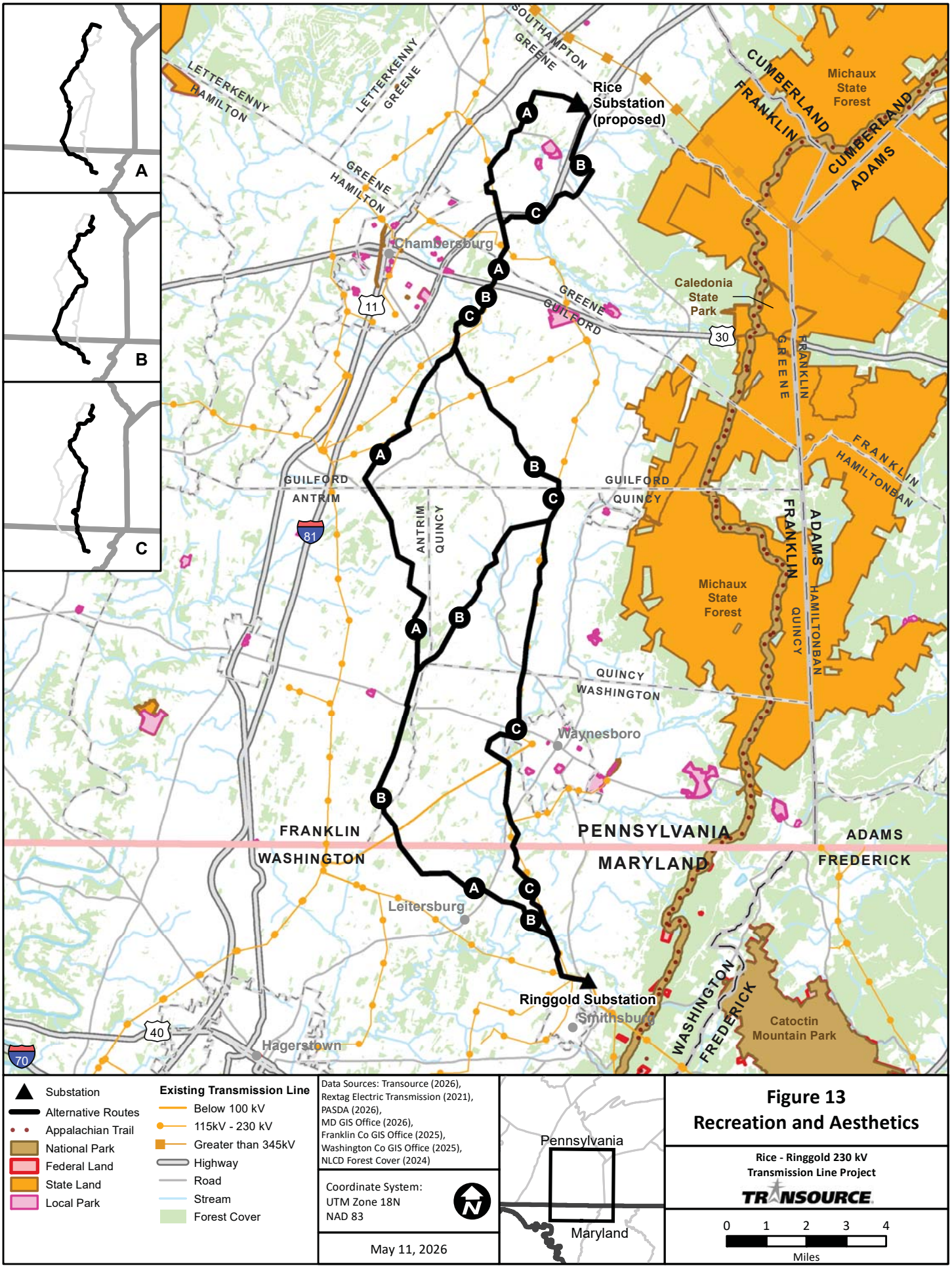
Public Trails

The Appalachian Trail is a 2,190 mile hiking trail extending from Maine to Georgia (Appalachian 2026). This trail is a federally protected recreational area that borders the eastern side of the Project Study Area along South Mountain, mostly within Michaux State Forest in Pennsylvania and preserved corridors in Maryland.

In addition, small community trail networks exist throughout the Project Study Area and serve the local community's recreation needs.

Alternative Route Comparison

None of the Alternative Routes will cross any state lands, recreational areas, or trail systems.


A
B
C
Rice Substation (proposed)
Ringgold Substation
Chambersburg
Waynesboro
Leitersburg
Smithsburg
Hagerstown
Michaux State Forest
Caledonia State Park
Catoctin Mountain Park
PENNSYLVANIA
MARYLAND
FRANKLIN
WASHINGTON
ADAMS
FREDERICK
GUILFORD
ANTRIM
QUINCY
GREENE
HAMILTON
HAMILTONBAN
CUMBERLAND
LETTERKENNY
SOUTHAMPTON
11
30
81
40
70
Substation
Alternative Routes
Appalachian Trail
National Park
Federal Land
State Land
Local Park
Existing Transmission Line
Below 100 kV
115kV - 230 kV
Greater than 345kV
Highway
Road
Stream
Forest Cover
Data Sources: Transource (2026), Rextag Electric Transmission (2021), PASDA (2026), MD GIS Office (2026), Franklin Co GIS Office (2025), Washington Co GIS Office (2025), NLCD Forest Cover (2024)
Coordinate System: UTM Zone 18N NAD 83
N
May 11, 2026
Pennsylvania
Maryland
Figure 13
Recreation and Aesthetics
Rice - Ringgold 230 kV Transmission Line Project
TRANSOURCE
0 1 2 3 4
Miles

4.2.3 Developed Land Use

Resource Characteristics

Characteristics of the developed land were identified, such as urban and developed land, institutions, mineral and subsurface resources, and airports. As detailed in **Section 2.3.3** meetings were held with the counties, and in Pennsylvania, the municipalities within the Project Study Area to discuss any potential future development plans. Within the Project Study Area there were numerous potential future development plans based on county/municipal meetings and landowner input. The data gathered from these meetings and discussions were considered during the siting process.

Urban and Developed Land

Developed areas within the Project Study Area are fairly concentrated, surrounded by land dominated by agricultural development. Urban land is focused around the town centers of Scotland, Chambersburg, Guilford, Fayetteville, Marion, Mont Alto, Greencastle, Waynesboro, Ringgold, Leitersburg, and Smithsburg. Concentrations of urban land also exist along the corridors of I-81, U.S. Route 30, SR 11, and SR 16, which are the major transportation routes through the area. Throughout the agricultural portions of the Project Study Area, small residential developments create communities that are not centered around a town. There are several industrial centers located within the Project Study Area, primarily near Chambersburg and along the I-81 corridor.

Institutions

Within the Project Study Area numerous schools, churches, religious facilities, cemeteries, and hospitals exist. A few examples are provided below:

- Cemeteries
  - St. Paul's Lutheran Church Graveyard (MD)
  - Brownsville Church of God Cemetery (PA)
- Churches
  - St Paul United Methodist Church (PA)
  - Wayside Baptist Church (MD)
- Schools
  - Fayetteville Elementary School (PA)
  - Greencastle-Antrim High School (PA)
  - Falling Spring Elementary School (PA)
- Hospitals
  - Waynesboro Hospital (PA)

Mineral and Subsurface Resources

There are several quarries within the Project Study Area in Pennsylvania, but none in the Maryland portion. New Enterprise Stone and Lime Company own the two limestone quarries in in Southampton Township; the Mount Cydonia Sand Plant Number 2 quarry is located in Greene Township; and the Mount Cydonia Number 1 and Chambersburg Quarry quarries are in Guilford Township. David H. Martin Excavating owns the Martin Shale Pit Number 2 located in Greene Township and the Martin Shale Pit Number 8 located in Chambersburg Township. The Commerce Street Shale Pit is in Hamilton Township and the Borough of Chambersburg, and the Letterkenny Road Shale Pit is located in Greene and Hamilton Townships (PADCNR 2026b).

Airports

Within the Project Study Area, there is one public use airport, Franklin County Regional Airport. Five private use airports also exist within the Project Study Area including the Lost Acres Airport, Rocktop Airport, and Five Lakes Airport.

Alternative Route Comparison

Developed commercial land within the Project Study Area is focused along specific highways including I-81, U.S. Route 30, and SR 16, and occasionally in the scattered villages in between. Residential development is very dense along U.S. Route 30 between Fayetteville and Chambersburg, west of I-81 north of Chambersburg, and in several towns located along the base of South Mountain, such as Waynesboro, Mont Alto, and Leitersburg. Moderate to low density residential development is sporadic across the rest of the landscape, with large areas dominated by agricultural fields with pockets of residential development along local roads.

The number of parcels crossed, and the number of unique landowners are relatively similar for all of the Alternative Routes despite the variability in lengths. Overall Alternative Route B, which is the longest route option, would involve the most parcels (153) and the most landowners (113). Conversely, Alternative Route C, which is the shortest option, would cross the fewest parcels (129) and also have the fewest landowners (102) thereby making it a better route from a landowner coordination perspective. Alternative Route A crosses a slightly increased number of parcels (132) and has the second fewest landowners (105).

Review of the distance the Alternative Routes would be from residential structures notes that no single family or multifamily homes are within the ROW. Alternative Route B would have the most homes within 100 feet of the transmission centerline (3), with Alternative Route C having the second most (2), and Alternative Route A having none. Alternative Route A has the most single family dwellings within both 250 feet (46) and 500 feet (151) of the centerline. Alternative Route

C has the least single family dwellings within 250 feet (26) and 500 feet (112) of the centerline.

Since all of the Alternative Routes need to cross U.S. Route 30, there will be sections of each that will extend through commercial areas along this highway. Other route sections will also parallel I-81, which also contains areas of dense commercial development. In most cases, siting a transmission line through a commercial area is an acceptable practice, but one that may have some engineering challenges due the height or spacing between the buildings, and the activities involved in the businesses (i.e., semi-truck storage, hydraulic lift operations). Review of the data indicates that none of the Alternative Routes ROWs would cross a commercial building. Alternative Route A has the most commercial buildings within 250 feet (15) and within 500 feet (58) of the centerline. Alternative Route C has the least commercial buildings within 250 feet (11) and 500 feet (37) of the centerline.

Another land use item evaluated were mines and quarries, which are typically incompatible with transmission lines due to the instability of the lands and the extensive operations involved in their processes. No mines were noted in the Project Study Area, but several active quarries are present, one of which is crossed by Alternative Route A. This route crosses an undeveloped portion of a limestone quarry that owns surrounding parcels and has plans for expansion. Alternative Routes B and C would not cross any quarries.

There are also several private airports in the Project Study Area that are located close to the developed areas around I-81 and U.S. Route 30. Efforts were made during the siting process to provide sufficient buffer around these facilities to reduce the potential need to coordinate with the Federal Aviation Administration (FAA), who would evaluate structure locations and elevations to provide determination on possible conflicts to landing and takeoff pathways. Alignments found to be in conflict may require additional engineering to reduce structure heights, which may result in an increase in the number of structures involved across these pathways. The data in **Table 8** notes that each of the alternative routes is within one mile of two airports in Pennsylvania and that each may require engineering modifications to address potential FAA concerns.

In regard to other social institutions in the Project Study Area, each of the Alternative Routes would be within at least 1,000 feet of one school. All Alternative Routes follow the same alignment in this area, through a forest area southeast of Falling Spring Elementary School with approximately 590 feet of woods between the school and these alignments. Alternative Route A would be within 1,000 feet of two churches or places of worship, while Alternative Routes B and C would be within 1,000 feet of one. None of the Alternative Route ROWs would cross a hospital or cemetery, or local park.

4.2.4 Historic and Archeological Resources

Resource Characteristics

As part of the Siting Study, a desktop survey of existing historic structures and archaeological resources within the Project Study Area was conducted by accessing the Pennsylvania Historical and Museum Commission's (PHMC) Pennsylvania's Historic and Archaeological Resource Exchange (PA-SHARE) and the Maryland Historic Trust's (MHT) "Medusa" GIS system and database to review available information on previously recorded historic structures, historic districts, and archaeological sites (PHMC PA-SHARE 2026, MHT Medusa 2026). The Project Study Area included a one-mile buffer of all of the proposed alignments for above ground resources (historic properties or districts), and a 130-foot wide ROW for archaeological resources. Cultural resources are depicted in **Figure 14** and only include the location of non-sensitive data tied to aboveground resources.

Pennsylvania

Historic Architecture

Thirty-seven National Register of Historic Places (NRHP)-listed or eligible properties or districts have been identified in the Project Study Area in Pennsylvania and are listed in **Table 6a.**

TABLE 6a: NRHP-listed or eligible Historic Properties in the Project Study Area (PA)

PHMC KEY#	Resource Name	Resource Address/ Location	NR Status/ SHPO Opinion Date	Township	County
LISTED					
877	Brotherton Farm	Falling Springs Rd.	Listed: 03/30/1979	Guilford	Franklin
906	Gass House (Union Plantation)	Franklin Farms Ln	Listed: 04/11/1977	Guilford	Franklin
79886	Corker Hill	1237 Garver Ln.	Listed: 03/13/2003	Greene	Franklin
96472	Waynesboro Armory	N Grant St.	Listed: 12/22/1989	Washington	Franklin
102235	Waynesboro Historic District	Multiple	05/08/2024	Waynesboro	Franklin
ELIGIBLE					
83691	Kreiner Rd. Bridge	Kreiner Rd., T-489	Eligible: 03/05/2007	Guilford	Franklin
87191	Patrick Vance House	297 Quarry Road	Eligible: 06/02/1986	Chambersburg	Franklin

TABLE 6a: NRHP-listed or eligible Historic Properties in the Project Study Area (PA)					
PHMC KEY#	**Resource Name**	**Resource Address/ Location**	**NR Status/ SHPO Opinion Date**	**Township**	**County**
96323	John Stam Farm	2330 Scotland Rd.	Eligible: 06/23/1989	Chambersburg	Franklin
97574	Marks Property	Off of Coquina Sands Drive	Eligible: 11/21/1991	Washington	Franklin
101782	Franklin County Poor House	Franklin Farms Ln	Eligible: 11/03/1993	Guilford	Franklin
101835	Christian Fry, Jr. House (Listed as District)	1438 Nolts Rd.	Eligible: 01/15/1997	Greene	Franklin
101841	C. Fry Farmstead	Kohler Rd.	Eligible: 10/13/1993	Greene	Franklin
102137	Eastern Greene Township Rural Historic District	Not Applicable	Eligible: 04/05/1994 (Not eligible: 04/28/2005)	Greene	Franklin
105585	Letterkenny Army Depot Chapel: Italian P.O.W. Chapel	New Franklin Rd.	Eligible: 10/04/1996	Letterkenny	Franklin
106025	Cumberland Valley Railroad (Shippensburg to MD line) Historic District	From Shippensburg, PA to Hagerstown, MD	Eligible: 03/04/1997	Multiple	Franklin, Cumberland
108701	Hambright Farmstead	1873 Ragged Edge Rd.	Eligible: 01/15/1997	Greene	Franklin
108705	Shivley Farmstead	528 Ragged Edge Rd.	Eligible: 01/15/1997	Greene	Franklin
108707	Sollenberger Farmstead	896 Ragged Edge Rd.	Eligible: 01/15/1997	Greene	Franklin
108717	S. Grove Farmstead	2585 Woodstock Rd.	Eligible: 01/15/1997	Greene	Franklin
108721	Morehead Kennedy House	1090 Ragged Edge Rd.	Eligible: 01/15/1997	Greene	Franklin

TABLE 6a: NRHP-listed or eligible Historic Properties in the Project Study Area (PA)					
PHMC KEY#	**Resource Name**	**Resource Address/ Location**	**NR Status/ SHPO Opinion Date**	**Township**	**County**
108723	Shivley's Schoolhouse	976 Ragged Edge Rd.	Eligible 01/15/1997	Greene	Franklin
108725	Brindle Farmstead	1883 Ragged Edge Rd.	Eligible 01/15/1997	Greene	Franklin
117257	McKee Historic District (Woodstock)	Woodstock Rd.	Eligible: 01/07/1997	Greene	Franklin
117364	Kuhns Farmstead (Jacob-Frey Farmstead)	1205 Mower Rd.	Eligible: 01/15/2001	Greene & Guilford	Franklin
117367	John Lehman Farmstead: Kuhns Farm	1316 Mower Rd.	Eligible: 01/15/1997	Greene	Franklin
117370	Mower Farmstead	1068 Mower Rd.	Eligible 01/15/1997	Greene & Guilford	Franklin
117373	Lantz Farmstead	1071 Mower Rd.	Eligible 01/15/1997	Greene	Franklin
117376	Peter Brindle Farmstead	2390 Woodstock Rd.	Eligible: 01/15/1997	Greene	Franklin
128900	Scotland School for Veterans' Children: Soldiers' Orphans School	3583 Scotland Rd.	Eligible: 10/29/2001	Chambersburg	Franklin
No Old/ 2010RE03283	Cumberland Valley Railroad	Multiple	Eligible: 09/02/2025	Greencastle	Franklin
100887/ 1985RE00844	Hambright's Mill Bridge	Not Provided	Not Provided	Greene	Franklin
562276/ 2025RE01407	Isaac Wallace Farm	412 Swamp Fox Rd	04/22/2025	Guilford	Franklin

TABLE 6a: NRHP-listed or eligible Historic Properties in the Project Study Area (PA)					
PHMC KEY#	**Resource Name**	**Resource Address/ Location**	**NR Status/ SHPO Opinion Date**	**Township**	**County**
123705/ 2019RE09996	John Oyler Farm	549 Spring Valley Rd	04/04/2019	Guilford	Franklin
39825/ 2019RE13219	John Snider Farm	Church Road	11/18/2019	Guilford	Franklin
No Old/ 1993RE00072	Rankin, Archibald, Farm	3272 Guilford Spring Road	04/09/2025	Guilford	Franklin
No Old/ 2019RE13595	Southeast Franklin County Rural Historic District	Multiple	08/19/2019	Washington	Franklin
No Old/ 2010RE01808	Western Maryland Railroad	Multiple	03/10/2021	Multiple	Franklin

The majority of the NRHP-eligible and listed properties within the Pennsylvania portion of the Project Study Area are either houses or farmsteads which date to the eighteenth and nineteenth centuries. Additionally, some of the NRHP-eligible and listed properties include schools, churches, poor houses, armories, an army chapel, and bridges that are in the Project Study Area. Many of these resources are either the oldest or a well-preserved example of its kind of architecture or building tradition within Franklin County. Several of these resources are also significant for their relation to certain people of historical significance. Many of these resources, particularly the farmsteads within Greene Township, have little to no information about the resource listed in PA-SHARE. Additionally, many of these resources include a comment from the PHMC that eligibility may need to be reassessed.

All of the NRHP-eligible and listed houses (not farmsteads) within Franklin County date to the eighteenth and nineteenth centuries. They are typically NRHP-eligible under Criterion C for architecture, though some have additional historical significance. The only NRHP-listed house includes the Gass House (PHMC Key# 000906; NRHP# 77001168) which is one of the oldest dwellings remaining in Franklin County. The Gass House was built by William Gass in 1760. It is significant as a well-preserved eighteenth-century stone farmhouse, but it is also significant as a

former residence of Patrick Gass who took part in the Lewis and Clark expeditions and fought under General Jackson in the War of 1812.

The NRHP-eligible houses within the Project Study Area include the Patrick Vance House (PHMC Key# 087191), the Christian Fry Jr. House (PHMC Key# 101835), and the Morehead Kennedy House (PHMC Key# 108721). The Patrick Vance house was built in the late eighteenth century and is an example of a stone, Georgian-style dwelling. The Christian Fry, Jr. House, built circa 1840-1860, is listed as a district as it is associated with several other above ground resources attributed to the Fry family. There is no information listed for the house on PA_SHARE. The Morehead Kennedy House is an eligible building with no data available as well.

The vast majority of the resources within the Project Study Area within Pennsylvania are farmsteads. The NRHP-listed farms include Corker Hill (PHMC Key# 079886; NRHP# 03000131), and the Brotherton Farm (PHMC Key# 000877; NRHP# 79002227). The Corker Hill Farm is an early eighteenth-century examples of a gentleman's farm/country estate that reflects both Federal and Colonial Revival. The Brotherton Farm is also known as the Brotherton-McKenzie Farm. This nineteenth-century farm is primarily significant for its Georgian style architecture and secondarily for its association with the history of agriculture, commerce and industry in Franklin County.

A large majority of the NRHP-eligible farmsteads within the Project Study Area are located in Greene Township, mostly identified during a late 1990's architectural survey. Approximately half of these NRHP-eligible resources include no information on PA-SHARE. These include the Shivley Farmstead (PHMC Key# 108705), the Hambright Farmstead (PHMC Key# 100887), the Brindle Farmstead (PHMC Key# 108725), the S. Grove Farmstead (PHMC Key# 108717), and the Sollenberger Farmstead (PHMC Key# 108707). Seven additional farmsteads have a small amount of information available on PA_SHARE, dating them to the late eighteenth-early twentieth centuries and identifying various construction materials of stone, brick, and timber. These resources include The C. Fry Farmstead (PHMC Key# 101841) built in 1780 and 1830, The Mower Farmstead (PHMC Key# 117370) built circa 1830, the Peter Brindle Farmstead (PHMC Key# 117376) built circa 1840-1850), The Lantz Farmstead (PHMC Key# 117373) built circa 1870, the John Lehman Farmstead: Kuhns Farm (PHMC Key# 117367) built in 1908, and the Kuhns Farmstead (Jacob-Frey Farmstead) (PHMC Key # 117364) with no construction date documented.

Six additional NRHP-eligible farm properties are located in the Project Study Area within Chambersburg, Washington, and Guilford. These resources include The John Stam Farm (PHMC Key # 096323), the Issac Wallace Farm (PHMC key# 562276 built circa 1800, the John Oyler Farm (PHMC Key# 123705) built circa 1920, the John Snider Farm (PHMC Key# 39825) built circa 1820, the Rankin Archibald Farm (PHMC Key# n/a) that dates between the mid eighteenth and the early nineteenth century, and the Marks Property (PHMC Key# 097574). The John Stam Farm includes a Pennsylvania German Bank Barn the was reported in the 2007 *Inventory of Pennsylvania*

Historic Barns, Franklin County report by the Center for Rural Pennsylvania. The date listed for the barn is 1814, with alterations in 1960. It is registered with the PA Department of Agriculture as a Century or Bicentennial Farm. The Marks property includes buildings of domestic and agriculture/subsistence functions, but no age or specific significance is noted in PA-SHARE. The Issac Wallace Farm includes a Classical Revival style stone house with several accompanying outbuildings, including a summer kitchen, which are eligible under Criterion A. The John Snider and John Oyler Farms both consist of a main house and several outbuildings that resemble other farms in the area. The Rankin Archibald Farm is currently pending eligibility status. The farm contains a Georgian style house with multiple outbuildings, including a spring house and summer kitchen, that range in date between the eighteenth and nineteenth century.

Two historical schools are located within the Project Study Area: the Scotland School for Veterans' Children (Soldiers' Orphans School) (PHMC Key# 128900) and Shivley's Schoolhouse (PHMC Key# 108723). The NRHP-eligible Scotland School for Veterans' Children (Soldiers' Orphans School) was built in 1932 with alterations made between 1951 and 1952. The resource includes ten buildings: a school and 9 dormitories. It continues to function as a school today. The third school, Shivley's Schoolhouse (PHMC Key# 108723), is documented as NRHP-eligible; however, no information about the resource is listed on PA-SHARE.

The NRHP-eligible Franklin County Poor House (PHMC Key# 101782) was built in 1808. It is a well-preserved example of a stone Federal-style Institutional Housing building.

The Western Maryland Railroad (PHMC Key# n/a) encompasses approximately 3,692-acres expanding across multiple counties. The railway was established in several waves, with the Maryland POS constructed circa 1904 and 1964 (c.1910-1960s).

Military-related resources include the Waynesboro Armory (PHMC Key# 096472; NRHP# 89002080), and the Letterkenny Army Depot Chapel/ Italian P.O. W. Chapel (PHMC Key# 105585).The NRHP-listed Waynesboro Armory was built in 1938 by Silverman & Levy and is significant under Criteria A and C for Military Architecture; it is one of seventeen armories built in 1938 in Pennsylvania. The NRHP-eligible Letterkenny Army Depot Chapel/ Italian P.O.W. Chapel (PHMC Key# 105585) was built in 1945. The PHMC notes that this resource is federally owned and under Covenant.

There are two NRHP-eligible bridges within the Project Study Area: the Kreiner Rd. Bridge (PHMC Key# 083691) and the Hambright Mill Bridge (PHMC Key# 00844). The Kreiner Rd. Bridge was a steel bridge that was built circa 1900 along the Western Maryland Railroad. It was listed as eligible in 2007; however, the comments within PA-SHARE indicate that the 1900 steel bridge may have been demolished around 2000 and replaced by a new box beam bridge in 2001. The eligibility status is therefore unclear and additional consultation with the PHMC would be

necessary. The Hambright Mill Bridge, or the Franklin County Bridge No. 4, is a roadway bridge with an intact component dating to circa 1905. Little information is recorded on PA_SHARE for the resource.

Pennsylvania Historic Districts

There are six Historic Districts within the Pennsylvania portion of the Study Area (not including PHMC Key# 101835 which is labeled as a historic district but appears to be an individual resource). Five districts are NRHP-eligible; these include the McKee Historic District (Woodstock) (PHMC Key# 117257), the Cumberland Valley Railroad Historic District (Shippensburg to MD line) (PHMC Key# 106025), the Southeast Franklin County Rural Historic District (PHMC Key# n/a), and the Eastern Greene Township Rural Historic District (PHMC Key# 102137). The Waynesboro Historic District (PHMC Key# 102235) is NRHP-listed as of May 8th, 2024.

The Waynesboro Historic District consists of mixed public and private resources across an approximate 599-acres. The resources within the district range in date form the late eighteenth century to the mid-twentieth century located primarily along Main Street and Clayton Avenue.

The McKee Historic District (Woodstock) is documented as significant in the areas of mid-nineteenth-century agriculture and subsistence. No additional information about the district is available on PA-SHARE. The Southeast Franklin County Rural Historic District is similarly documented with little information; however, approximately 473 resources are located within the district boundaries.

The Cumberland Valley Railroad Historic District (Shippensburg to MD line) is considered eligible for NRHP listing under Criterion A, for its contribution to the long-term development of the Cumberland Valley and to the railroad industry. The rail line crosses from Shippensburg, PA to Hagerstown, MD and passes approximately 34 miles through multiple towns. The district consists of the rail bed, with approximately 25 bridges, crossings, and tracks. It was built circa 1837- 1841 with additions circa 1908- 1913. Few of the original associated buildings remain, as most of the stations have been demolished. As of 1997, the railroad was still in use as part of Conrail's Hagerstown Secondary Line.

The Eastern Greene Township Rural Historic District is a 1,659 acre Historic District that is unclear in its eligibility. According to PA-SHARE records, the district is officially listed as eligible. However, according to the Administrative Actions, the PHMC and National Park Service originally determined the district to be eligible in 1995, and the National Park Service determined it to be eligible in 1995. All National Register Nominations have been returned, and as of 2005, PHMC determined the district to be not eligible following a site visit. The current status documented on PA_SHARE is maintaining the determination of eligibility (DOE)- eligible as of August 22, 2018.

Archaeology

Three PHMC-identified archaeological sites are located within the 130-foot ROW Archaeological Study Area assigned to each alternative route and are listed in **Table 6b**. Due to the sensitivity of these resources, **their location is considered proprietary and is only being made available to the PUC for review per their regulatory requirement**. Identification and avoidance of specific sites will be coordinated with the PHMC as part of the permitting process that will be required after the Proposed Route has been approved.

TABLE 6b: Identified Archaeological Sites within the Archaeological Study Area (PA)

Site#	Resource Name	Resource Type	NR Status/ SHPO Opinion Date
36FR0001	Unknown Site	Open Habitation prehistoric	Insufficient Information to Evaluate
36FR0337	2390 Woodstock Road Site	Open Prehistoric Site, Unknown Function	Insufficient Information to Evaluate
36FR0078	Woodstock I-81 Site	Open Habitation prehistoric	Insufficient Information to Evaluate

All sites within the Archaeological Study Area are prehistoric sites. All sites have been identified but have not been assessed for NRHP listing eligibility.

Maryland

Historic Architecture

Eight NRHP-listed or eligible properties have been identified in the Project Study Area in Maryland and are listed in **Table 7a**. Historic properties are defined as buildings, structures, districts, objects, sites, and linear historic sites aged 50 years or more. Additional identified historic properties which have not been assessed for NRHP eligibility are not included in this report. Once an alignment is chosen, additional research will be done to identify other historic architectural resources within the ROW, or which may be affected visually.

TABLE 7a: NRHP-listed or eligible Historic Properties in the Project Study Area (MD)						
MHT ID#	**NRHP REF#**	**Resource Name**	**Resource Address/ Location**	**NR Status/ SHPO Opinion Date**	**Township**	**County**
LISTED						
WA-I-142	3001292	Rockledge	13535 Foxfire Ln.	Listed: 12/18/2003	Hagerstown	Washington
WA-I-154	90001994	Huckleberry Hall (Charles Mill)	Charles Mill Rd.	Listed: 12/28/1990	Hagerstown	Washington
WA-I-174	3001295	Leitersburg Historic District		Listed: 12/19/2003	Leitersburg	Washington
ELIGIBLE						
WA-I-156	Not Available	Brick House, Near Leitersburg	22527 Ringold Pike	Eligible: 08/09/2002	Hagerstown	Washington
WA-IV-049	Not Available	Kretsinger Farm	13654 Kretsinger Rd.	Eligible: 08/09/2002	Smithsburg	Washington
WA-IV-259	Not Available	Smithsburg Historic District	Not Available	Eligible: 05/07/2004	Smithsburg	Washington
WA-IV-001	Not Available	Newcomer Farm	13809 Poplar Grove Rd	Eligible: 8/9/2002	Hagerstown	Washington
WA-IV-050	Not Available	Kohler-Ridenour Farm	13731 Kretsinge Rd	Eligible: 8/9/2002	Hagerstown	Washington

All but one of the NRHP eligible and listed properties within the Maryland portion of the Project Study Area are either houses or farmsteads which date to the eighteenth and nineteenth centuries. Many of these are either the oldest or a well-preserved example of its kind of architecture or building tradition within Washington County. Several of these resources are also significant for their relation to certain ethnic groups (German) or the agricultural history of the area.

Rockledge (MHT Inventory# WA-I-142; NRHP# 03001292) is an NRHP-listed building which is significant for exemplifying the limestone architecture typical of rural Washington County in the eighteenth and early nineteenth centuries. Rockledge retains sufficient integrity to stand as a representative example of this regional building tradition. Unlike the majority of surviving

limestone houses of the period, which are relatively large buildings constructed in a single building campaign, Rockledge was built in three sections during the early nineteenth century. This process of enlargement reflects the economic status of the owner.

Huckleberry Hall (MHT Inventory# WA-I-154; NRHP# 90001994) is NRHP-listed and is significant for its architectural character. Built about 1784, the house embodies the distinctive characteristics of eighteenth century rural Germanic domestic architecture in the middle to western sections of Maryland. While the house includes many typical Germanic characteristics, it does include unique features such as a four-room plan rather than the typical three-room plan, original interior finishes including stenciling and marbleizing, and the placement of the stair rising across a front window.

Brick House, near Leitersburg (MHT Inventory# WA-I-156) is a farmstead property eligible for NRHP-listing as a significant surviving example of early Washington County vernacular architecture. Both houses on the property are characteristic of late eighteenth and early nineteenth-century German farmsteads in the region, and the farm maintains its historical continuity. This property is eligible for listing under Criterion A for its association with regional agricultural practices and its ties to important ethnic groups (Germans) significant in the region's development. The property is also eligible under Criterion C for its architecture.

The Newcomer Farm (MHT Inventory #WA-IV-001) is a farmstead property eligible for NRHP-listing. The property is associated with traditional German farmers who occupied the area in the nineteenth century and is currently still in use as a farm with associative significance under Criterion C for both architectural and landscape components.

Kretsinger Farm (MHT Inventory# WA-IV-049) is an NRHP-eligible resource that includes five buildings: a brick house, barn, agricultural storage building, spring house, and an abandoned frame dwelling. The property is recommended eligible under Criteria A and C. The combined elements of this historic property are consistent with regional German-influenced farmsteads composed of multiple dwellings, agricultural outbuildings, and fields. Additional research may reveal that it’s a component in a larger rural historic landscape district.

The Kohler-Ridenour Farm (MHT Inventory #WA-IV-050) is a nineteenth century farmstead that contains a stone house and spring that is typical of regional-German farmsteads of Washington County. The house most likely served as the primary residence to the farm’s owners prior to the construction of a second home at the beginning of the twentieth century. Despite alterations to the twentieth-century house, the active farm continues its historic use and mostly remains intact. The farmstead is eligible for the NRHP under criterion A for its association with the traditional German farming in Washington County.

Maryland Historic Districts

There are two Historic Districts within the Maryland portion of the Project Study Area. One of the districts is NRHP-listed: the Leitersburg Historic District (MHT Inventory# WA-I-174: NRHP# 03001295). The Smithsburg Historic District (MHT Inventory# WA-IV-259) is an NRHP-eligible historic district.

The Leitersburg Historic District is significant for its association with the development of commerce and transportation in Washington County and the surrounding region in the nineteenth and early twentieth centuries. The NRHP-listed Leitersburg Historic District derives additional significance as a well-preserved example of crossroads community which characterized the region in the nineteenth century, and for its variety of historic architecture. The village comprises a cohesive collection of architectural resources reflecting a wide variety of vernacular types and popular expressions dating from the early nineteenth century through the early twentieth century.

The Smithsburg Historic District is an NRHP-eligible historic district. The district is eligible under Criteria A and C, maintaining its integrity of design, materials, setting and feeling of a mid-size rural community. The district is primarily residential in character with commercial structures clustered at the intersection of Water and Main streets. The period of significance dates to nineteenth and twentieth century.

Archaeology

Three MHT-identified archaeological sites are located within the 130-foot ROW Archaeological Study Area and are listed in **Table 7b**. Due to the sensitivity of these resources, **their location is considered proprietary and is only being made available to the PUC for review per their regulatory requirement**. Identification and avoidance of specific sites will be coordinated with the MHT as part of the permitting process that will be required after the Proposed Route has been approved.

TABLE 7b: Identified Archaeological Sites within the Archaeological Study Area (MD)

Site#	Resource Name	Resource Type	NR Status/ SHPO Opinion Date
18WA108	N1, N2 Site	Early Archaic-Late Woodland short term resource procurement	Insufficient Information to Evaluate
18WA149	1898 Site	Late Archaic-Early Woodland Possible short-term camp	Insufficient Information to Evaluate
18WA111	G1	Unknown prehistoric; short-term camp	Insufficient Information to Evaluate

All sites within the Archaeological Study Area are prehistoric sites. Two of the sites, 18WA108 and 18WA149, date between the Archaic and the Woodland periods. The remaining site, 18WA111, was identified by a single test pit and non-diagnostic surface finds in which temporal affiliation could not be determined. . All of the prehistoric sites within the Project Study Area have been identified but have not been assessed for NRHP listing eligibility.

General Impacts

Potential impacts on NRHP-listed and eligible architectural historic properties may be visual, created by the construction of transmission structure and clearcutting of vegetation within the ROW. Visual impacts will vary based on local relief, height of existing vegetation, and any intervening recent development. Additional effort will be needed to map these resources within the Project Study Area and ROW once a proposed alternative is chosen. Any physical impacts on architectural historic properties will be minimized, where practicable, by strategically locating access roads, staging areas, and structure away from the historic resource. Impacts on archaeological sites typically occur during the ground-disturbing activities associated with construction of a structure, e.g., construction of new access roads, clearing of the ROW, establishing equipment staging areas, driving of tired or tracked vehicles, and structure construction. Whenever possible, these impacts on identified sites will be minimized by strategically locating access roads, staging areas, and structure away from any archaeological sites. If any historic architectural resource or archaeological site cannot be physically avoided, then additional consultation will be carried out with either the PHMC or MHT. A Phase I cultural resources study will likely be required by the PHMC and/or the MHT.

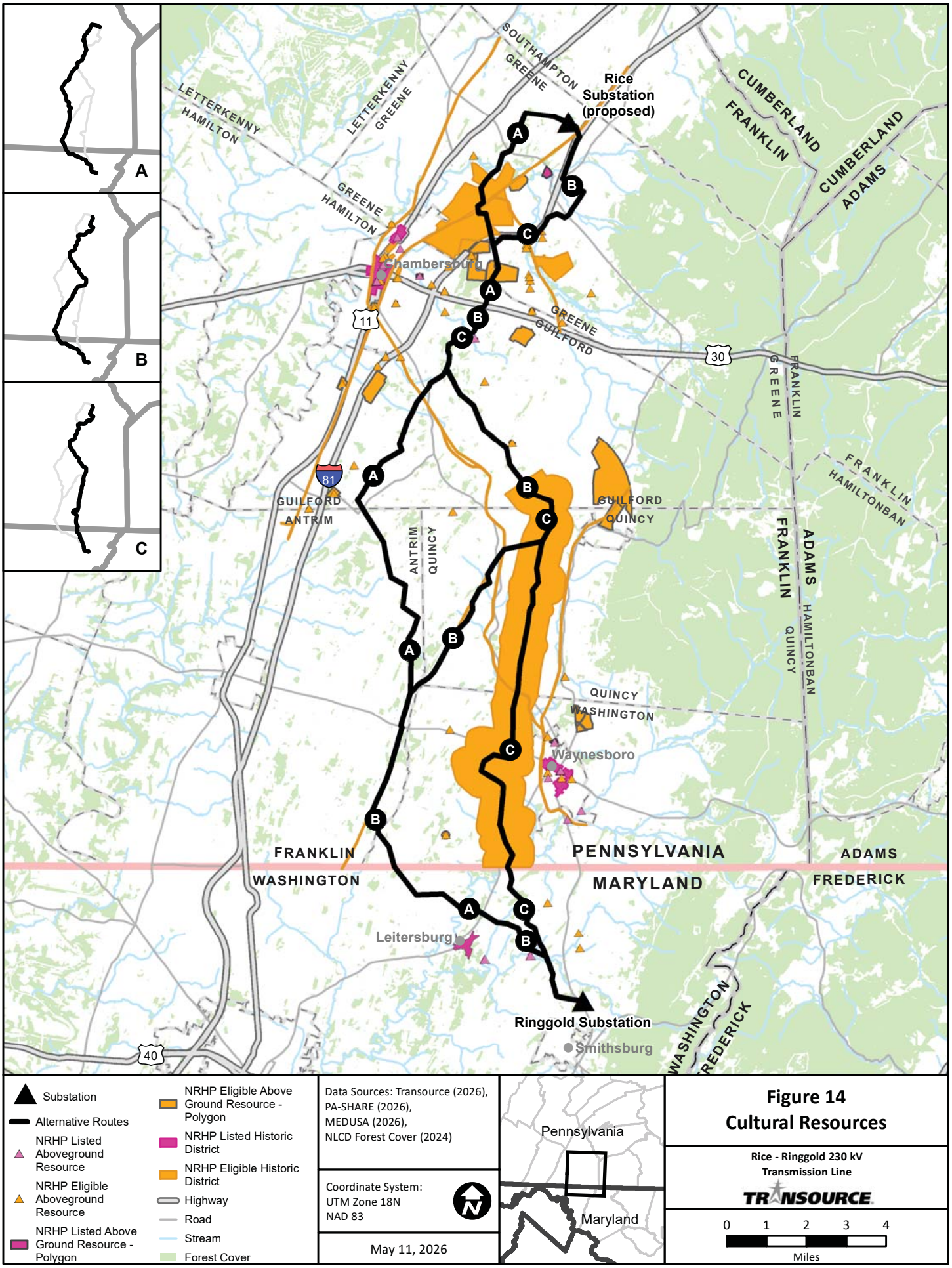
Alternative Route Comparison

A considerable number of NRHP-listed and -eligible historic properties and districts are located near Chambersburg, along I-81, and north of U.S. Route 30, as well as near Waynesboro. These resources range from single structures on a small private parcel to large farmsteads that extend over 1,000 acres. Due to the size, density, and location of these features, some of which border both sides of I-81, options to totally avoid crossing some of them were not feasible. Similarly, numerous archaeological sites were noted parallel to Conococheague Creek, which also extends north of U.S. Route 30, along portions of I-81, and near Chambersburg. These areas also vary in size with most being one acre or less, but others extending over 20 acres. As these features are located along some of the linear corridors that the Alternative Routes parallel (e.g., transmission lines, I-81), avoidance of all these areas was not feasible.

It should be noted that those alternatives that parallel existing transmission lines have a higher potential for identified aboveground and archeological resources, versus undeveloped areas,

since they have undergone studies tied to their development. Review of **Table 8** indicates that all of the Alternative Routes would be within 0.25 mile of a NRHP-listed property, but that Alternative Route A and B would be near the most (2). Alternative Route B would also cross the most archaeological sites (6) and have the most archaeological sites within 250 feet of the alignment (8). Conversely, Alternative Route C would have the least NRHP-eligible properties within 0.25 miles (1), cross the fewest archaeological sites (4), and be within 250 feet of the fewest archaeological sites (6). Alternative Route C is therefore the best option from a historic resource impact avoidance perspective.

The route selected will ultimately be reviewed by both the PHMC and MHT within the requisite area of potential effect (APE) determined for the Project to ascertain the potential impacts on historic aboveground and archeological resources.


A
B
C
Rice Substation (proposed)
Ringgold Substation
Chambersburg
Waynesboro
Leitersburg
Smithsburg
PENNSYLVANIA
MARYLAND
FRANKLIN
WASHINGTON
ADAMS
FREDERICK
GUILFORD
ANTRIM
QUINCY
GREENE
HAMILTON
LETTERKENNY
SOUTHAMPTON
CUMBERLAND
HAMILTONBAN
11
30
81
40
Substation
Alternative Routes
NRHP Listed Aboveground Resource
NRHP Eligible Aboveground Resource
NRHP Listed Above Ground Resource - Polygon
NRHP Eligible Above Ground Resource - Polygon
NRHP Listed Historic District
NRHP Eligible Historic District
Highway
Road
Stream
Forest Cover
Data Sources: Transource (2026), PA-SHARE (2026), MEDUSA (2026), NLCD Forest Cover (2024)
Coordinate System: UTM Zone 18N NAD 83
May 11, 2026
Pennsylvania
Maryland
Figure 14
Cultural Resources
Rice - Ringgold 230 kV Transmission Line
TRANSOURCE
0 1 2 3 4
Miles

4.2.5 Scenic Resources

Resource Characteristics

Aesthetics are defined as a mix of landscape visual character, the context in which the landscape is viewed (view/user groups), and the scenic integrity of the landscape. This study reviewed the potential visibility and visual impact of the Alternative Routes through landscape character assessment, field evaluation, and environmental factor tabulations.

Visual character encompasses the patterns of landform (topography), vegetation, land use, and aquatic resources (e.g., lakes, streams, and wetlands). Multiple elements influence visual character, such as natural systems, human interactions, and land use. In natural settings, the visual character attributes are natural elements such as forested mountains or scenic rivers and lakes, whereas rural or pastoral/agricultural settings may include manmade elements such as fences, walls, barns and outbuildings, and occasional residences. In a more developed setting, the visual character may include commercial or industrial buildings, manicured lawns, pavement, and other infrastructure.

The Siting Team observed four distinctive landscapes within the Study Area: 1) forested and mountain view, 2) pastoral and farming communities, 3) small residential communities, and 4) urban towns.

Forested areas and mountain views are mainly observed along the eastern portion of the Project Study Area. A number of state forests and parklands exist in this region, including Michaux State Forest, Caledonia State Park, and Norlo Park. No designated scenic overlooks, vistas, or byways are documented in the Project Study Area.

Alternative Route Comparison

All of the Alternative Routes would span the main roads that crisscross the Project Study Area and traverse across relatively similar agricultural viewsheds. Alternative Route A would parallel the least length of existing linear infrastructure (7.6 miles). Alternative Route B would parallel relatively more existing infrastructure (11.3 miles) but would be the longest option and have more potential to impact surrounding communities. Alternative Route C parallels the longest length of existing infrastructure (12.1 miles) and is the overall shortest option, therefore, minimizing new visual impacts to the area with the introduction of fewer poles.

Table 8: Land Use Evaluation Criteria				
Alternative Route	**Unit**	**A**	**B**	**C**
General				
Length	miles	**30.1** PA: 23.5 MD: 6.6	**31.0** PA: 24.4 MD: 6.6	**27.9** PA: 23.5 MD: 4.4
Number of parcels[1] crossed	count	**133** PA: 98 MD: 35	**153** PA: 118 MD: 35	**129** PA: 108 MD: 21
Number of parcels acquired	count	0	0	**86** PA: 68 MD: 18
Landowners within ROW	count	**106** PA: 76 MD: 30	**113** PA: 83 MD: 30	**102** PA: 85 MD: 17
Residential				
Barns, outbuildings, sheds, garages and silos in the ROW (excludes abandoned features)	count	**1** PA: 1 MD: 0	**5** PA: 5 MD: 0	**2** PA: 2 MD: 0
Residences/single-family dwellings within ROW	count	**0** PA: 0 MD: 0	**0** PA: 0 MD: 0	**0** PA: 0 MD: 0

Table 8: Land Use Evaluation Criteria				
Alternative Route	**Unit**	**A**	**B**	**C**
Residences/single-family dwellings within 100 feet of centerline	count	**0** PA: 0 MD: 0	**3** PA: 3 MD: 0	**2** PA: 2 MD: 0
Residences/single-family dwellings within 250 feet of centerline	count	**48** PA: 40 MD: 8	**32** PA: 24 MD: 8	**26** PA: 22 MD: 4
Residences/single-family dwellings within 500 feet of centerline	count	**164** PA: 126 MD: 38	**130** PA: 92 MD: 38	**112** PA: 92 MD: 20
Multi-family dwellings [2] within ROW	count	**0**	**0**	**0**
Multi-family dwellings within 250 feet of centerline	count	**0** PA: 9 MD: 0	**9** PA: 9 MD: 0	**9** PA: 9 MD: 0
Multi-family dwellings within 500 feet of centerline	count	**28** PA: 28 MD: 0	**28** PA: 28 MD: 0	**28** PA: 28 MD: 0
Commercial/Industrial				
Businesses/commercial buildings[3] within the ROW	count	**0**	**0**	**0**

Table 8: Land Use Evaluation Criteria				
Alternative Route	**Unit**	**A**	**B**	**C**
Businesses/commercial buildings within 250 feet of the centerline	count	**15** PA: 14 MD: 1	**12** PA: 11 MD: 1	**11** PA: 10 MD: 1
Businesses/commercial buildings within 500 feet of the centerline	count	**62** PA: 60 MD: 2	**38** PA: 36 MD: 2	**37** PA: 35 MD: 2
Mining areas crossed	count	**0**	**0**	**0**
Quarries crossed	count	**1** PA: 1 MD: 0	**0**	**0**
Airports within one mile of the centerline	count	**2** PA: 2 MD: 0	**2** PA: 2 MD: 0	**2** PA: 2 MD: 0
Undeveloped Lands				
Pasture/rangeland crossed in ROW (based on NLCD data)	acres	**86.5** PA: 45 MD: 41.5	**78.1** PA: 36.6 MD: 41.5	**53.5** PA: 33.1 MD: 20.4
Cropland crossed in ROW (based on NLCD data)	acres	**283** PA: 242 MD: 41	**293.2** PA: 252.2 MD: 41	**307.6** PA: 271.8 MD: 35.8

Table 8: Land Use Evaluation Criteria				
Alternative Route	**Unit**	**A**	**B**	**C**
Tree farms/orchards crossed in ROW	acres	**10.4** PA: 5.6 MD: 4.8	**4.8** PA: 0.0 MD: 4.8	**6.2** PA: 3.6 MD: 2.6
Agricultural easements crossed in ROW	acres	**32.5** PA: 24.2 MD: 8.3	**69.2** PA: 60.9 MD: 8.3	**55.2** PA: 34.2 MD: 21
Tree clearing required in the ROW (digitized based on aerial photography)	acres	**65.5** PA: 46.5 MD: 19	**54.6** PA: 35.6 MD: 19	**49.8** PA: 38.1 MD: 11.7
Length of clearing parallel to existing linear infrastructure	miles	**0.2** PA: 0.1 MD: 0.1	**0.7** PA: 0.4 MD: 0.3	**0.4** PA: 0.2 MD: 0.2
Community/Recreational Facilities				
Schools within 1,000 feet of centerline	count	**1** PA: 1 MD: 0	**1** PA: 1 MD: 0	**1** PA: 1 MD: 0
Designated places of worship within 1,000 feet of centerline	count	**2** PA: 1 MD: 1	**1** PA: 0 MD: 1	**1** PA: 0 MD: 1

Table 8: Land Use Evaluation Criteria				
Alternative Route	**Unit**	**A**	**B**	**C**
Cemeteries within 250 feet of centerline	count	**0**	**0**	**0**
Hospitals, and assisted living facilities within 250 feet of centerline	count	**0**	**0**	**0**
Parks and recreation areas crossed by the ROW	count	**0**	**0**	**0**
Scenic byways crossed	count	**0**	**0**	**0**
Protected Land				
Federal/state land crossed by ROW	acres	**0**	**0**	**0**
Local public lands crossed by ROW	acres	**0**	**0**	**0**
Cultural Resources				
NRHP-listed historic properties within 1/4 mile of the centerline	count	**2** PA: 1 MD: 1	**2** PA: 1 MD: 1	**1** PA: 1 MD: 0
National Landmarks within 1/4 mile of the centerline	count	**0**	**0**	**0**
Listed or Eligible Historic Districts within 1/4 mile of the centerline	count	**4** PA: 4 MD: 0	**4** PA: 4 MD: 0	**4** PA: 4 MD: 0

Table 8: Land Use Evaluation Criteria				
Alternative Route	**Unit**	**A**	**B**	**C**
Known NRHP-eligible historic properties within 1/4 mile of the centerline	count	**4** PA: 4 MD: 0	**9** PA: 9 MD: 0	**9** PA: 9 MD: 0
Identified archaeological sites within ROW	count	**3** PA: 0 MD: 3	**6** PA: 3 MD: 3	**4** PA: 3 MD: 1
Identified archaeological sites within 250 feet of centerline	count	**6** PA: 1 MD: 5	**8** PA: 3 MD: 5	**6** PA: 3 MD: 3

[1] The number of parcels crossed refers to the number of individual plots of owned land recorded by each County. The number of landowners within the ROW represents the number of individual landowners, who each may own one or more parcels.

[2] Multi-family dwellings include townhome, condominium, and apartment complexes, and duplexes

[3] Commercial development includes retail, service, office, restaurants, and lodging establishments

4.3 Constructability

This section discusses the constructability of a proposed transmission line, as it relates to engineering and construction concerns. Major factors that affect constructability include, but are not limited to, steep topography, condensed ROWs, heavy angles, proximity to existing infrastructure facilities, accessibility, safety and cost. A comparison of the engineering and construction considerations for the Alternative Routes is presented at the end of this section in **Table 9.**

4.3.1 Engineering Design Considerations

Transmission Right-of-Way

The siting process attempted to minimize route length which ultimately minimizes impacts to human/built and environmental resources. Assessment of the Alternative Routes considered paralleling existing electric lines, or paralleling other infrastructure (i.e., roadways, railways or gas lines) relative to cross-country options. Although no linear features provided a direct alignment between the two substation sites, several linear options were noted across the landscape including I-81, the Norfolk Southern railroad, and a variety of transmission line ROW corridors that extend for considerable lengths in a general north to south alignment. Evaluation of the transmission line ROWs identified residential or other commercial development adjacent to the ROW, particularly near U.S. Route 30 and in the northern portions of the Project Study Area. At these locations, the Alternative Routes deviated from a parallel alignment to avoid existing constraints.

Engineering and Construction Considerations

Potential engineering and construction challenges are important to consider when siting a transmission line. Transmission line crossings, road and railroad crossings, nearby towers or antennas, and heavy angles, dense residential or commercial development, along with narrow ROW alignments are all elements that could ultimately require extensive or non-standard engineering and lead to an increase of impacts and overall cost.

A few specific transmission line ROWs south of U.S. Route 30 were identified that provided opportunities for considerable lengths of paralleling. To maintain the paralleling capacity along these stretches, however, the Alternative Routes would occasionally need to cross over the existing alignment. Engineering of these crossovers is a common event but can involve specific structural design challenges depending on the landscape and the voltage of the lines involved.

Spanning over existing roadways is also an engineering consideration due to the density of telephone and distribution lines that often parallel these corridors. Engineering review of these existing features is necessary to design the new alignment with required distances between these

electrical systems. Part of the review focuses on the structure placement, which is often preferred close to the road edge to provide crossings at the highest point of the conductor, however, state highway expectations are that these structures are not too close to the roadway to ensure safer conditions for vehicles. Spanning major highways such as interstates can also be challenging due to the agency coordination required for the permits and potential for road closures during the wire installation process.

Another consideration is the crossing of railroads. Railroads provide opportunities for paralleling but crossing over these features can be complex. Ideally, new transmission lines would cross at 90° degree angles to the railroad, but many scenarios involve heavy angle crossings that need to take into consideration the width and height of the various rail cars that use the tracks. Other considerations are the presence of additional railroad lines in adjacent sequence and aboveground infrastructure of the railroad that may also parallel the rail line.

Numerous communication towers are also located in the Project Study Area. These tall structures are typically supported by an extensive network of guy wires that would be difficult to engineer around and were avoided where possible during the siting process.

Spanning over existing electrical transmission lines is also an engineering consideration to be assessed during the siting process. Depending on the voltage of the lines involved, new transmission lines would be required to cross under or over the existing lines. For this Project, the new 230 kV line would typically cross over any of the existing transmission line systems in the Project Study Area. Crossing over lines requires review of the clearances needed between the conductors, which will affect the height of the new structures needed to achieve these clearances. In addition, transmission line crossings require coordination during construction, operations, and maintenance for taking outages on the existing line. The scenario becomes further complicated in situations where the new alignment would be required to cross back and forth over the existing system several times to maintain a parallel alignment

A final consideration is the number of heavy angles (greater than 30°) required along the various Alternative Routes. Due to the tensions necessary on the conductor wires, sharp turns typically require stronger support which is typically achieved through larger structures, the use of multi-pole structures, or the installation of guy wires. These options involve additional assessment of the terrain and the transmission line alignments leading into and out of these sharp turn scenarios to determine the best engineering course of action.

Alternative Route Comparison

As noted, paralleling existing linear features, such as transmission lines or roadway corridors, is typically viewed as a common siting practice to minimize the cumulative effect of a new right-of-way. Given the constrained environment adjacent to most of the existing linear corridors, only a few options were realized in the Project Study Area. Alternative Route A would parallel the least of these linear features. Alternative Route C would have the longest alignment paralleling these features, with approximately one-quarter of its length being parallel to an existing transmission line and additional 2.6 miles adjacent to roadways. Alternative Route B would have the second longest length paralleling these features, with approximately one-quarter of its length paralleling a railroad or transmission line corridor, and an additional 2.6 miles adjacent to roadways. As such, Alternative Routes B (36%) and C (43%) are therefore the best options from a paralleling existing linear infrastructure perspective.

Review of **Table 9** indicates that all Alternative routes would span 1-81 once. Alternative Route B would cross the most local roadways (42), Alternative route A would cross 34, and Alternative Route C would cross the least (32). Alternative A and B would involve the most railroad crossings (3). Alternative Route C would involve only one railroad crossings. As such, Alternative Route C is therefore the best option from a railroad or roadway crossing perspective.

Alternative Route C would be within 1,000 feet of the most communication towers (4), whereas Alternative Route A would have the least (1) and Alternative B the next fewest (2). The locations of the Alternative Routes relative to these structures are not considered problematic at this time as the distances to these features are still far enough away to not require any engineering modifications.

In terms of heavy angle structures, most of these turns in the alignment are required to follow specific property lines or to avoid other constraint areas such as additional stream crossings or dense forested areas. Review of the data notes that Alternative Routes A and B would involve the most heavy angle turns and that Alternative Route C would involve the least.

4.3.2 Topography

In general, the Alternative Routes traverse a relatively broad valley with rolling hills between the Appalachian Mountains and South Mountain. The elevation change for the Alternative Routes is relatively minor given that all the Alternative Routes are located in the valley area and not on the slopes of South Mountain.

Alternative Route Comparison

All of the Alternative Routes avoid the steep slopes of South Mountain and are located in the more level terrain of the Conococheague Creek valley. All of the Alternative Routes cross less

than 2 miles of steep slopes with Alternative Routes B and C crossing slightly more steep slopes and Alternative Route A crossing the least amount. In general, all of the Alternative Routes would have the same constructability considerations for steep slopes given the terrain.

4.3.3 Access Roads

The access road networks that will be required to construct and potentially maintain the proposed alignment are being developed as engineering completes more the transmission line design and as landowner negotiations occur. Most of the access roads will be located within the new ROW corridor to help further minimize the impact of the Project on the surrounding human/built and environmental landscape. Many of these roads will be temporary in nature as they would extend across agricultural lands or through forested areas and will need to be removed at the end of construction. Stabilized road bases may be left in places that can be used for future access, but few new permanent roads will be developed.

Where possible, existing farm or forest roads will be evaluated and used instead of developing new access roads, which could involve grading to provide the desired slopes for the heavy equipment that would be involved in the construction. Landowner coordination to secure the rights to use these existing roads will be required.

Alternative Route Comparison

The overall location of each Alternative was considered as it relates to the siting of temporary and permanent on and off-ROW access roads and what challenges may be present along each route. Review of the Maryland portion of the Project Study Area note that the terrain across this area is generally hilly but not steep; hence the same level of grading would be anticipated for each of the options. Since Alternative Routes A and B would extend diagonally from northwest to southeast for a further distance across the state, they would be anticipated to involve more access road development. Alternative Route C would extend for a shorter distance across the states and along an existing transmission line alignment, thus less access road development is anticipated.

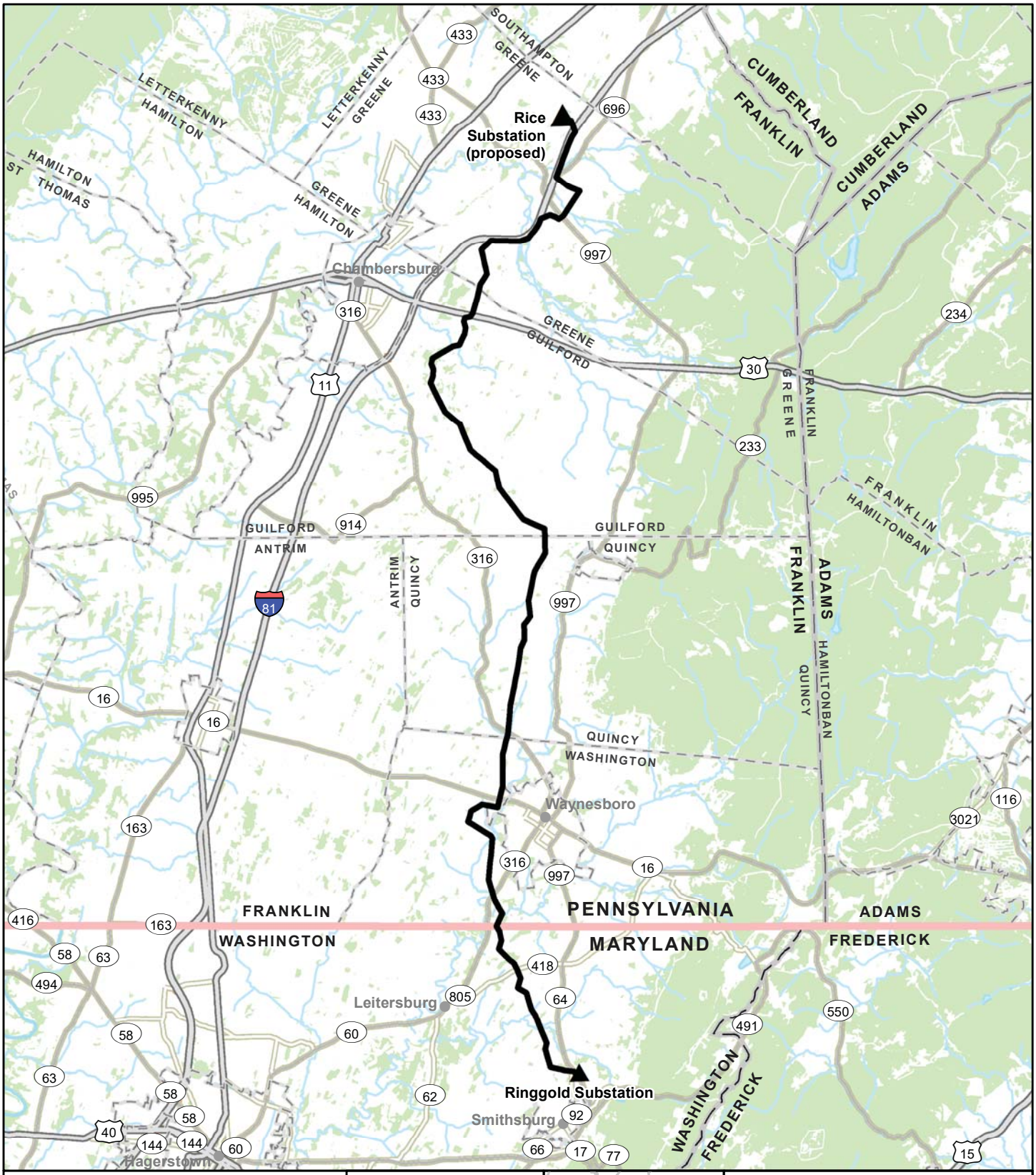
In Pennsylvania, the majority of the area is agricultural with less terrain variations and more local roads. Therefore, access for any of the Alternative Routes is expected to be similar; however, Alternative Route C is the shortest in length and therefore likely to require less access road construction.

Overall, Transource will minimize additional impacts to streams, wetlands, and sensitive habitat areas by siting the access roads outside these features.

Table 9. Constructability Evaluation Criteria				
Alternative Route	**Unit**	**A**	**B**	**C**
General				
Length	miles	**30.1** PA: 23.5 MD: 6.6	**31.0** PA: 24.4 MD: 6.6	**27.9** PA: 23.5 MD: 4.4
Transportation Resources				
Interstate highways crossed	count	**1** PA: 1 MD: 0	**1** PA: 1 MD: 0	**1** PA: 1 MD: 0
U.S. highways crossed (combination of state and U.S.)	count	**1** PA: 1 MD: 0	**1** PA: 1 MD: 0	**1** PA: 1 MD: 0
State highways crossed	count	**8** PA: 4 MD: 4	**8** PA: 4 MD: 4	**8** PA: 5 MD: 3
Local roads and streets crossed	count	**34** PA: 26 MD: 8	**42** PA: 34 MD: 8	**32** PA: 27 MD: 5
Railroads crossed	count	**3** PA: 3 MD: 0	**3** PA: 3 MD: 0	**1** PA: 1 MD: 0
Utility Resources				
Oil and gas pipelines crossed	count	**6** PA: 6 MD: 0	**7** PA: 7 MD: 0	**9** PA: 8 MD: 1

Table 9. Constructability Evaluation Criteria				
Alternative Route	**Unit**	**A**	**B**	**C**
Communication towers within 1,000 feet of the centerline	count	**1** PA: 1 MD: 0	**2** PA: 2 MD: 0	**4** PA: 4 MD: 0
Existing 69 kV Transmission Lines Crossed	count	**1** PA: 1 MD: 0	**1** PA: 1 MD: 0	**1** PA: 1 MD: 0
Existing 115 kV Transmission Lines Crossed	count	**2** PA: 1 MD: 1	**2** PA: 1 MD: 1	5 PA: 4 MD: 1
Existing 138 and 230 kV Transmission Lines Crossed	count	**8** PA: 4 MD: 4	**9** PA: 5 MD: 4	8 PA: 4 MD: 4
Existing 500 kV Transmission Lines Crossed	count	**0**	**0**	0
Engineering and Construction Considerations				
Steep slopes crossed by ROW (>20%), percent of total	miles	**1.6 (5%)** PA: 1.1 MD: 0.5	**1.4 (5%)** PA: 0.9 MD: 0.5	**1.7 (6%)** PA: 1.3 MD: 0.4
Heavy angles, greater than 30 degrees	count	**43** PA: 32 MD: 11	**41** PA: 30 MD: 11	**33** PA: 25 MD: 8
Rights-of-Way Rebuild/Parallel				
Existing 69 kV transmission lines paralleled	miles	**0**	**0**	**0**

Table 9. Constructability Evaluation Criteria				
Alternative Route	**Unit**	**A**	**B**	**C**
Existing 115 kV transmission lines paralleled	miles	**0.6** PA: 0.6 MD: 0	**0** `PA: 0 MD: 0	**5.2** PA: 5.2 MD: 0
Existing 138 and 230 kV transmission lines paralleled	miles	**1.6** PA: 1.4 MD: 0.2	**2.4** PA: 2.2 MD: 0.2	**4.3** PA: 2.9 MD: 1.4
Existing 500 kV transmission lines paralleled	miles	**0**	**0**	**0**
Interstate highways, U.S. highways, State highways, and local roads paralleled	miles	**1.9** PA: 1.8 MD: 0.1	**2.6** PA: 2.5 MD: 0.1	**2.6** PA: 2.5 MD: 0.1
Railroad	miles	**3.5** PA: 3.5 MD: 0.0	**6.3** PA: 6.3 MD: 0.0	**0**
Total length paralleled	miles	**7.6** PA: 7.3 MD: 0.3	**11.3** PA: 11 MD: 0.3	**12.1** PA: 10.6 MD: 1.5
Percent of length paralleled	**%**	**25%** PA: 24% MD: 1%	**36%** PA: 35% MD: 1%	**43%** PA: 38% MD: 5%



- Substation
- Alternative Route C (Proposed Route)
- Highway
- Road
- Stream
- Forest Cover

Data Sources: Transource (2026), Rextag Electric Transmission (2021), NLCD Forest Cover (2024)

Coordinate System:
UTM Zone 18N
NAD 83

May 11, 2026



Figure 15
Proposed Route

Rice - Ringgold 230 kV
Transmission Line Project

TRANSOURCE

0 1 2 3 4
Miles

5.0 IDENTIFICATION OF THE PROPOSED ROUTE

The goal in selecting a Proposed Route for the Project is to minimize impacts on land use and natural and cultural resources while avoiding circuitous routes, extreme costs, and non-standard design requirements. However, in practice, it is not usually possible to minimize all potential impacts. There are often inherent tradeoffs in potential impacts to every siting decision. For example, in heavily forested study areas, the route that avoids the most developed areas will likely have the greatest amount of forest clearing, while the route that has the least impact on vegetation and wildlife habitats often impacts more residences or farm lands. Thus, an underlying goal of a siting study is to reach a reasonable balance between minimizing potential impacts on one resource versus increasing the potential impacts on another.

The following section summarizes the rationale for selection of the Proposed Route, and thus, the route that the Siting Team considered to best minimize the overall impacts of the Project. The rationale presented is derived from the accumulation of the siting decisions made throughout the process, the knowledge and experience of the Siting Team, comments from the public and regulatory agencies, and the comparative analysis of potential impacts presented in Section 4. Based on the data reviewed in this Siting Study, **Alternative Route C was determined to be the Proposed Route (the "Proposed Route")**.

5.1 Proposed Route Summary

Alternative Route C has an approximate length of 27.9 miles (approximately 23.5 miles in Pennsylvania and approximately 4.4 miles in Maryland). Being a more direct alignment (2-3 miles shorter than the other alternatives) between the Rice and Ringgold Substations will cross the fewest parcels (129) and impact the fewest landowners (102) compared to the other alternatives. The alignment avoids the more populated sections of the Project Study Area by crossing undeveloped lands adjacent to I-81 and paralleling an existing transmission line corridor south past Waynesboro as it extends into the Ringgold Substation. Additionally, the proposed route spans U.S. Route 30 in a commercial retail area thereby minimizing impacts to the residentially dense areas along this corridor. As a result, the Proposed Route has the fewest residences within 500 feet (112) compared to Alternative A (151) and Alternative B (130).

This more direct route will also help minimize impacts to agricultural lands, farming operations, and orchard areas since many of the alignments across these areas were identified during early coordination with the landowners. Key requests during this coordination were to span fields or parallel property lines or access roads where feasible, and to provide specially engineered structures near orchards to allow the orchard trees to remain in production under the ROW.

Environmentally, Alternative Route C would span a low number of streams (22) and have minimal impact on Maryland riparian buffer areas (0.6 acres). As noted previously, streams and floodplains will be crossed at right angles and spanned with structures typically placed outside these regulated areas. Since one of the streams crossed will be the Pennsylvania HQ-designated Falling Spring Branch waterway, which is crossed by all three routes, the construction of this alignment will involve additional stormwater permitting requirements focused on the preservation of the water quality level. In terms of wetlands, this alignment would cumulatively cross the least wetland area relative to the other alternatives. Similar to streams and floodplains, wetland areas will be spanned to further minimize potential impact.

Alternative Route C has the least amount of tree clearing which will reduce forest fragmentation effects and potential impacts to T&E species that use forest habitats such as T&E bat species. In terms of other potential T&E habitat areas, Alternative Route C would cross three natural areas in Pennsylvania and one SSPRA area in Maryland, which are comprised predominantly of open meadows which can be spanned by the transmission lines therefore minimizing potential impacts on the plant or animal communities.

From an engineering perspective, Alternative Route C parallels existing linear features for 43% of the total length of the transmission line which allows for the use of existing access roads. Overall, Alternative Routes C is the preferred route from an engineering and constructability perspective. In addition, Alternative Route C will not interfere with any quarry operations and will be more than 1 mile from an airport. Although Alternative Route C crosses more transmission lines (14), Transource will work with the incumbent utilities to ensure proper clearances in order to safely operate and maintain the facilities.

Conclusion

Based on a qualitative and quantitative review of information obtained from GIS data, field reconnaissance, agency consultation and public outreach as well as engineering and constructability considerations for the Project, the Siting Team recommends Alternative Route C as the Proposed Route as depicted in **Figure 15**. An overview of the Proposed Route is provided in a detailed aerial map book in Appendix C. Appendix D contains **Figure 16** which is an overview of environmental, human/built, and historic resources within 2 miles of the Proposed Route.

Collectively, the Siting Team believes that the Proposed Route meets the goal of minimizing impacts on land use, and the natural and cultural resources along the route, while avoiding circuitous routes, extreme costs, and non-standard design requirements.

5.2 Proposed Route Impacts and Mitigation

The following is a discussion of the anticipated Project impacts and potential permit and mitigation requirements of the proposed 9A West Project.

Transource is working diligently with relevant property owners to secure the necessary ROW easements along the Proposed Route to minimize the impact on existing and future land use. Efforts were made during the transmission line siting process to minimize impacts on existing and future land uses, as well as avoid sensitive natural resources such as wetlands and streams. Where potential impacts are unavoidable, mitigating factors will be employed.

As part of the permitting process, any required waterway, wetland, or floodplain encroachment permits will be obtained from PADEP, MDE and the USACE prior to construction and Transource will comply with all special conditions placed on the permits. In addition, to address water quality standards within watersheds along the Project corridor, Transource will comply with the regulations of the NPDES permit program, obtain the required soil erosion and sedimentation control permits, and follow the specified conditions required for the permit.

5.2.1 Land Use

Siting analyses for the Proposed Route was conducted with acknowledgement of existing and proposed land uses. Some impact on existing and future land use may occur, including clearing of forest areas and reducing potential areas for residential or commercial development. Establishment of ROW easement areas also preclude certain uses such as constructing structures or installing swimming pools within the easement area. Transource is working with property owners to minimize the impact on existing and future land uses.

The Proposed Route will also be designed to minimize conflicts with the existing transportation network and other utilities currently located or proposed along the route. The necessary state Highway Occupancy Permits or equivalent type permits will be acquired by Transource for those respective highway crossings and all other state road access points prior to construction. The permit processes typically includes review of the plans to ensure that the transmission structure locations and development are in compliance with current safety regulations regarding height and sight clearances. This permit process will also be used to coordinate the actual crossing of U.S Route 30 with the conductor wires, which often requires the temporary closure of the highway.

5.2.2 Agriculture

Transmission lines and agricultural land uses are not incompatible land uses. Farming, animal husbandry, and plant husbandry can continue underneath the transmission lines for most crops,

farm animals, and orchards. Many of the national standards for transmission line design are specifically in place to ensure that typical farm machinery can continue to operate in the vicinity of and under transmission lines.

Key requests from farm owners were to span fields or parallel property lines or access roads where feasible, and to provide specially engineered structures near orchards to allow the orchard trees to remain in production under the ROW. Transource worked with landowners to understand any immediate plans to expand farming operations that included buildings and worked to minimize impact where possible. Transource has also worked to minimize impacts through selective siting of pole locations and alignment with the goal of not impacting the ability to farm the fields. Currently, the potential cumulative area that would be directly affected by pole placement, with an assumed 10-foot diameter, accounts for less than 0.5 acre across the approximate 29 mile alignment of the Proposed Route.

5.2.3 Natural Features

Vegetation clearing and maintenance is required to abide by the federal guidelines mandated by NERC to ensure the safe and reliable operation of the line on the Proposed Route. Transource's vegetation management practices will allow for the re-generation of compatible species of low growing trees, shrubs, and grasses, where practicable. Herbicides used on the ROW will be EPA-approved and will be applied selectively in accordance with all label instructions. Different herbicides will be used based on the environmental conditions with specific attention to not negatively affect streams and wetlands areas. Application of these herbicides near sensitive resources would be conducted by hand-held spraying; no aerial spraying will be used along the alignment. Determination of the mitigation requirements for forest impacts, as well as for impacts to the other natural resources, will be part of the permit review process.

Wetlands along the Proposed Route will be delineated using PADEP, MDE, and USACE approved methodologies based on the "*Interim Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Eastern Mountains and Piedmont Region*". Once the wetlands have been delineated, an engineering review will be conducted to minimize the potential impact to these resources through strategic structure placement that will be oriented to span the wetlands where possible. Impacts to wetlands will be further minimized by identifying access road networks that do not need to cross these features. All required permits for these unavoidable wetland impacts will be obtained from the PADEP, MDE, and the USACE prior to construction. Mitigation in the form of wetland creation, enhancement, or conservation may be required for these wetland impacts.

Streams along the Proposed Route will also be delineated using PADEP, MDE, and USACE approved methodologies. Long-term impacts to these watercourses are expected to be minimal, as they will be spanned by the proposed transmission line, with most crossings oriented to span the feature at a 90° angle to minimize impacts to the adjacent riparian area. Some mitigation efforts may be required as a result of the reduction in riparian buffer along these features. Due to the water quality level in these watersheds, an Individual NPDES permit will be required to mitigate any potential short-term impacts of erosion and sedimentation during construction. As part of the Individual NPDES process, additional and more sophisticated Best Management Practices (BMPs) may be required during construction to maintain the high water quality standards in the watersheds and obtain the NPDES permit.

FEMA and state-identified floodplains are found adjacent to watercourses and identify the areas that routinely flood during heavy rain events. Encroachment within a floodplain area is discouraged by the regulatory agencies due to the potential of the structure to increase the flooding hazard in the local area. Where practicable, transmission structures will be constructed outside the floodplain areas. Due to the wide valleys associated with many of the waterways along the Proposed Route, many of the floodplains and floodways will be relatively narrow and can be spanned by the transmission line. For those locations where the floodplains are not avoidable, additional analysis of the proposed structures may be required by PADEP and MDE to confirm the activity will not create flooding conditions in the local area. No structures will be located in the floodway of any stream.

5.2.4 Threatened and Endangered Species

During the siting process, threatened and endangered species and habitat data were collected from those federal and state agencies that handle this information to understand the location of sensitive resources. Effort has already been made at this initial step to site the proposed route, knowing where such resources are located. Coordination with state and federal agencies regarding potential threatened and endangered species will be initiated prior to commencing field surveys to ensure any necessary habitat or species specific survey are completed during the appropriate time of year. Transource is committed to obtain all necessary permits and approvals from the applicable jurisdictional agencies and complying with any conditions or requirements imposed on such permits.

5.2.5 Cultural Resources

During the siting process cultural resources data were collected from both PHMC and MHT to understand the location of sensitive resources. Effort has already been made at this initial step to site the proposed route knowing where such resources are located, and working to avoid NRHP listed sites, and where possible avoiding eligible resources. Cultural resource coordination with the PHMC and MHT is underway and with selection of the proposed route Transource will further

coordinate with the PHMC and MHT to determine an area of potential effect (APE) and complete the necessary surveys. Transource is committed to working with the PHMC and MHT to complete any required studies and address any potential impacts and required mitigation activities.

5.2.6 Community Features and Conserved Lands

Community features, which include schools, daycare centers, churches, and cemeteries, were identified and effectively avoided during the route selection process. One school parcel that is currently forested would be crossed by the Proposed Route.

Conserved lands involve areas preserved as private or public open space. No private or public open space areas are located along the Proposed Route.

5.2.7 Anticipated Agency Requirements and Permits

In summation of the items reviewed above, several specific threatened and endangered species studies, wetland/stream studies, and archaeological surveys will need to be conducted that provide information on possible avoidance and impact areas along the Proposed Route. Transource is committed to obtain all necessary permits and approvals from the applicable jurisdictional agencies and complying with any conditions or requirements imposed on such permits.

5.2.8 Review of County Comprehensive Plans and Municipal Level Zoning

Public utility features, such as transmission lines and substations are generally exempt from local municipal authority. To further the Commonwealth's goal of making agency actions consistent with sound land use planning by considering the impact of its decision upon local comprehensive plans and zoning ordinances, the Pennsylvania Public Utilities Commission (PUC) adopted a policy on January 11, 2001 that requires the public utility to review comprehensive land use plans and local zoning ordinances to evaluate the impact of proposed projects on these items (See 52 Pa. Code 69.1101, 31 Pa. Bull. 951 [Feb. 17, 2001]). In adherence to PUC regulations, Transource evaluated the proposed Rice-Ringgold 230 kV Transmission Line Project's (9A West Project) consistency with the zoning ordinances and comprehensive plans of Franklin County and associated municipalities through which the Project would pass.

Pennsylvania

The Franklin County Commissioners (FCC) first prepared a comprehensive plan in 1999, but more recently adopted an update in July of 2023 (**Table 10**). The updated comprehensive plan, *Imagine Franklin 2035* (Plan), "serves as the guiding framework for the county's growth and development over the next decade and beyond" (FCC 2023). Franklin County has experienced "tremendous growth and change" in recent years, necessitating a plan that includes thoughtful strategies to

accommodate and anticipate the current and future needs of communities and residents (FCC 2023).

The Plan is not intended to regulate and has no official authority, but all planning efforts at the municipal level are meant to be guided by the goals, objectives, and policies outlined within. The Plan lists eight (8) goals spread across three (3) focus areas:

Quality of Place

1. Create a strong sense of place within our historic urban centers by activating underutilized and vacant spaces and supporting economic vitality.

2. Ensure our transportation network supports our goals.

Quality of Life

1. Provide community facilities in concert with our approach to future growth.

2. Support human services that work to help people improve their lives and their livelihood.

3. Provide access to quality housing that meet the needs of a growing community.

Quality of Growth

1. Expand attainable housing options.

2. Strengthen opportunities to grow our workforce and educational assets.

3. Balance growth opportunities that provide housing and business development to support future populations with preservation of the county's scenic beauty and natural resources.

In an effort to meet these goals, Franklin County plans to invest in existing urban centers, protecting natural and scenic areas, and provide resources for individuals and families, such as sufficient workforce opportunities and human services (FCC 2023).

The Plan provides an overview of each focus area and includes recommendations, goals, supporting data, and action items. The Plan encourages locally implemented land use strategies and is positioned to be the central resource for providing model ordinance language and other planning ideas to communities so that development and conservation goals can be encouraged to be upheld. As a result of this initiative, many of the townships with the County have developed or updated comprehensive plans and municipal zoning ordinances. Many of these townships have worked jointly with adjacent townships to develop multi-municipal comprehensive plans

(**Table 11**). Specific to the Project, Washington Township and Waynesboro Borough have coordinated to develop the Washington Township and Waynesboro Borough Joint Comprehensive Plan (Washington Township Planning Commission; Waynesboro Borough Planning Commission 2009). Specific townships, including Southampton and Greene Townships have prepared individual comprehensive plans and recent updates to guide their specific land use plans (Greene Township 2019; Southampton Township Planning Commission 2001). These municipal comprehensive plans generally reiterate the concerns raised by the county-level comprehensive plans. Of note, Greene Township's Comprehensive Plan encourages efforts to strengthen relationships between private utility companies and local municipalities to ensure that all interested parties' needs are being met in a mutually beneficial way (Greene Township 2019). Gilford and Quincy Townships do not have Township specific Comprehensive Plans.

Township Zoning

Local zoning ordinances have been adopted in all six (6) of the municipalities that will be crossed by the Project in Franklin County. These ordinances are used to guide future land use in the townships by encouraging development of desirable residential, commercial, agricultural, and industrial areas with appropriate groupings of compatible and related land uses. Ordinances defining the allowances and restrictions associated with the various zoning districts typically identify "Essential Services" or "Public Utility Facilities," which include distribution, transmission, or collection systems associated with utilities such as water, gas, and electric, to be conditionally exempt from local regulations, as long as the required actions are approved by the state utility commission.

As such, the proposed Project will not have any effect on zoning within any of the townships crossed.

Maryland

In 1971 the Washington County Planning and Zoning Commission created and adopted the first Comprehensive Plan. To date, the *2040 Comprehensive Plan,* adopted in August 2025, was prepared by the Washington County Department of Planning and Community Development Department and is an update to the 2002 Comprehensive Plan for Washington County.

The Comprehensive Plan identifies eight goals and objectives to use as a guide for future land use policy in Washington County, in consideration of County and State visions, public input, analysis of past and projected growth trends, studies on the fiscal impact of growth, anticipated capital improvement program funding levels, and review of strengths and weaknesses of the former Comprehensive Plan (Washington County 2025).

1. Provide a diverse range of housing for citizens that promote sustainable, livable and affordable housing opportunities.
2. Promote a balanced and diversified economy.
3. Provide a safe, efficient, and interconnected multi-modal transportation system.
4. Maintain policies and strategies that direct growth to areas where the County can provide adequate infrastructure and community resources for existing and future development.
5. Provide residents with a high quality of life through the impactful planning and delivery of fundamental community facilities and services.
6. Enhance the County's rich historic and cultural heritage through land preservation and historic preservation efforts.
7. Provide adequate protections for, and enhanced stewardship of, environmental resources and sensitive areas.
8. Encourage infill development and revitalization of existing communities using context sensitive development strategies to maintain and enhance community

In 2012, the Maryland General Assembly repealed State Legislation Article 66B and replaced it with the Land Use Article, which delegates planning and land use regulatory authority to non-charter counties and incorporated municipalities. The Board of County Commissioners of Washington County designates the Planning Commission and the Department of Planning and Zoning to prepare and periodically update the comprehensive plan to guide growth and development in the County. As such, the Comprehensive Plan has been developed in accordance with State statutes and becomes a policy document flexible enough to address changing circumstances yet rigid enough to establish a reasoned and practical vision of the future which can balance the need to grow and develop with the protection of the natural, cultural and human resources which make Washington County a unique place to live, work and play (Washington County 2025).

The type, location and timing of development is regulated through County laws and ordinances such as the Zoning Ordinance, as well as guidance through functional plans such as the Water and Sewerage Plan. In particular, the Zoning Ordinance is critical to the overall regulatory implementation of the Comprehensive Plan. The Proposed Route will traverse through the Agricultural (Rural) District (A(R)) and Business, General District (BG). The Zoning Ordinance states Essential Utility Equipment shall be permitted in any zoning district, as authorized and regulated by law and ordinances of Washington County, it being the intention hereof to exempt

such essential services from the application of this Ordinance; except that, without in any way altering or otherwise affecting such exemption, the plans of any overhead electric transmission line of 69 kV or more, on metal or wooden poles or towers or pole structures, proposed to be erected or installed in any A(R), EC, P, RV, RS, RT, RU, or RM District shall be submitted before the beginning of construction to the Planning and Zoning Commission for its review.

Table 10: Summary of Zoning and Comprehensive Plans within the Project Study Area

COUNTY/TOWNSHIP	ZONING	COMPREHENSIVE PLAN
Franklin County	N/A	Imagine Franklin 2035 (2023)
Southampton Township	Zoning Map (2017) and Ordinance (2017)	Southampton Township Comprehensive Plan Update (2001)
Greene Township	Zoning Map (2026) and Ordinance (2025)	Greene Township Comprehensive Plan Update (2019)
Guilford Township	Zoning Map (2012) and Ordinance (2024)	No Comprehensive Plan
Quincy Township	Zoning Map (2011) and Ordinance (2012)	No Comprehensive Plan
Washington Township	Zoning Map (2025) and Ordinance (2025)	Washington Township and Waynesboro Borough Joint Comprehensive Plan (2009)
Waynesboro Borough	Zoning Map (2019) and Ordinance (2024)	Washington Township and Waynesboro Borough Joint Comprehensive Plan (2009)
Washington County	Zoning Map (2018) and Ordinance (2018)	2040 Comprehensive Plan (2025)

6.0 REFERENCES

2026. Appalachian Trail Conservancy. Interactive Map. https://appalachiantrail.org/experience/interactive-map/.

2026a. Code of Maryland Regulations (COMAR), Title 26, Subtitle 08, Chapter 02, Section 01. https://regs.maryland.gov/us/md/exec/comar/26.08.02.01.

2026b. COMAR, Title 26, Subtitle 08, Chapter 02, Section 02. https://regs.maryland.gov/us/md/exec/comar/26.08.02.02.

2026c. COMAR, Title 26, Subtitle 08, Chapter 02, Section 04. https://regs.maryland.gov/us/md/exec/comar/26.08.02.04#D(1).

2026. Federal Emergency Management Administration (FEMA). FEMA's National Flood Hazard Layer (Official). FEMA's National Flood Hazard Layer (NFHL) Viewer.

2014. Franklin County Agricultural Land Preservation Board (FCALPB). Franklin County Agricultural Land Preservation Program. Franklin-County-Agricultural-Land-Preservation-Program.pdf.

2023. Franklin County Commissioners (FCC). Imagine Franklin 2035. Franklin County, Pennsylvania. Imagine-Franklin-2035-Final-Document1-1.pdf.

2019. Greene Township Planning Commission. Greene Township Comprehensive Plan Update. Green Township, Franklin County, Pennsylvania. https://greenetwp.org/comprehensive-plan/.

2015a. Legal Information Institute. Maryland Code of Federal Regulations. 40 CFR 131.12 – Antidegradation Policy and Implementation Methods. https://www.law.cornell.edu/cfr/text/40/131.12.

2015b. Legal Information Institute. Maryland Code of Federal Regulations. 40 CFR 131.3 – Definitions. https://www.law.cornell.edu/cfr/text/40/131.3.

2026. Maryland Department of Agriculture (MDA). Maryland Agricultural Land Preservation Foundation (MALPF). https://mda.maryland.gov/malpf/pages/default.aspx.

2019. Maryland Department of Natural Resources (MDNR). List of Rare, Threatened, and Endangered Species of Washington County. https://dnr.maryland.gov/wildlife/documents/washington_county_rtes.pdf.

2021. Maryland Department of Natural Resources (MDNR). Sensitive Species Project Review Areas. Sensitive Species Project Review Areas (SSPRA).

2026a. Maryland Department of Natural Resources (MDNR). Maryland Wetlands of Special State Concern. Maryland Wetlands - Wetlands, Polygon (Special State Concern) | Maryland's GIS Data Catalog.

2026b. Maryland Department of Natural Resources (MDNR). Maryland's Natural Areas. https://dnr.maryland.gov/wildlife/Pages/NaturalAreas/Natural-Areas-Statewide-Map.aspx.

2026c. Maryland Department of Natural Resources (MDNR). Maryland Environmental Trust. http://dnr.maryland.gov/met/pages/tax_benefits.aspx.

2026d. Maryland Department of Natural Resources (MDNR). Land Acquisition and Planning Maryland's Rural Legacy Program. https://dnr.maryland.gov/land/Pages/RuralLegacy/home.aspx

2026e. Maryland Department of Natural Resources (MDNR). Targeted Ecological Areas (TEAs). https://data.imap.maryland.gov/datasets/maryland::maryland-focal-areas-targeted-ecological-areas/about.

2026f. Maryland Department of Natural Resources (MDNR). Maryland Public Lands Managed by the Wildlife and Heritage Service. http://dnr.maryland.gov/Wildlife/Pages/publiclands/home.aspx.

2026g. Maryland Department of Natural Resources (MDNR). Western Region Public Hunting Lands. https://dnr.maryland.gov/wildlife/Pages/publiclands/wmawestern.aspx.

1997. Maryland Department of Natural Resources (MDNR). State Forest Conservation Manual, Third Edition, 1997. https://www.washco-md.net/wp-content/uploads/StateForestConsv.Tech_.Manual.pdf

2026. Maryland Department of the Environment (MDE). Tier II High Quality Waters Map. https://mde.geodata.md.gov/TierIIHQWaters/

1967. Maryland Geological Survey(MGS). Generalized Geologic Map of Maryland. http://www.mgs.md.gov/maps/gengeomap.pdf.

2026. MGS. Karst Features (data hosted by Washington County). https://washcomd.maps.arcgis.com/apps/instant/sidebar/index.html?appid=32ea4d0ed91f4ea89b9fa5aefbf376c7.

2026. Maryland Historic Trust (MHT). Maryland's Cultural Resource Information System (Medusa). https://apps.mht.maryland.gov/medusa/.

2026. Maryland Manual On-line. State Parks (by county). http://msa.maryland.gov/msa/mdmanual/01glance/html/parks.html.

2026. National Audubon Society. Important Bird Areas of Pennsylvania and Maryland. Audubon Mid-Atlantic | Audubon. Accessed March 2026.

2026. National Wilderness Preservation System (NWPS). https://www.wilderness.org/articles/article/national-wilderness-preservation-system.

2026a. Pennsylvania Department of Conservation and Natural Resources (PADCNR). Bureau of Topographic and Geologic Survey. Map 1, Data. https://maps.dcnr.pa.gov/publications/Default.aspx?id=712.

2026b. PADCNR. NonFuel Mineral Resources. https://newdata-dcnr.opendata.arcgis.com/datasets/DCNR::quarries-nonfuel-mineral-resources/explore?location=39.869729%2C-77.519327%2C11. .

2026c. PADCNR. Michaux State Forest. https://www.pa.gov/agencies/dcnr/recreation/where-to-go/state-forests/find-a-forest/michaux.

2026d. PADCNR. Karst Features. https://newdata-dcnr.opendata.arcgis.com/datasets/a8ce961fb81641f4b9e52b828fc33b85_8/explore?location=40.438300%2C-76.807550%2C8,

2026d. PADCNR. State Parks http://m.dcnr.state.pa.us/StateParks.

2026. Pennsylvania Department of Environmental Protection (PADEP). Chapter 93 *Water Quality Standards*. http://www.pacode.com/secure/data/025/chapter93/chap93toc.html.

2023. Pennsylvania Fish and Boat Commission (PFBC). Pennsylvania Wilderness Trout Streams. https://www.pa.gov/content/dam/copapwp-pagov/en/fishandboat/documents/fishing/all-about-fish/catch-pa-fish/trout/pawildernesstroutstreams.pdf.

2026a. PFBC. Approved Trout Streams (stocked). https://experience.arcgis.com/experience/733dd58067ab453f954aa78598ab5a01.

2026b. PFBC. Class A Wild Trout Waters. February 2026. https://www.pa.gov/content/dam/copapwp-pagov/en/fishandboat/documents/fishing/all-about-fish/catch-pa-fish/trout/classa.pdf.

2026c. PFBC. Pennsylvania Wild Trout Waters (Natural Reproduction); February 2026. http://www.fishandboat.com/Fish/PennsylvaniaFishes/Trout/Documents/trout_repro.pdf.

2026. Pennsylvania Game Commission (PGC). PGC Mapping Center. http://pagame.maps.arcgis.com/apps/webappviewer/index.html?id=98bd698a3d194a5797ce4c80ef34bbcb.

2026. Pennsylvania Historic and Museum Commission (PHMC). Pennsylvania's Historic and Archaeological Resource Exchange (PA-SHARE). https://share.phmc.pa.gov/pashare/landing.

2008. Reger, James P. and Emery T. Cleaves. Maryland Geological Survey. Physiographic Map of Maryland (scale 1:250,000). Version MDPHYS2003.2. http://www.mgs.md.gov/geology/physiographic_map.html.

2000. Sevon, W.D. Physiographic Provinces of Pennsylvania, Map 13. Pennsylvania Geologic Survey. Harrisburg, PA. http://www.dcnr.state.pa.us/cs/groups/public/documents/document/dcnr_016202.pdf

2001. Southampton Township Planning Commission. Southampton Township Comprehensive Plan Update. Southampton Township, Franklin County, Pennsylvania. http://www.southamptontownship.org/information/planning/

2004. The Nature Conservancy (TNC). *A Natural Areas inventory of Franklin County, Pennsylvania*, 2004. Middletown, PA.

2003. United States Department of Agriculture (USDA), Natural Resources Conservation Service (NRCS). Soil Survey of Washington County, Maryland. https://archive.org/details/washingtonMD2001/page/n1/mode/2up.

1975. United States Department of Agriculture (USDA), Natural Resources Conservation Service (NRCS). Soil Survey of Franklin County, Pennsylvania. Soil Survey of Franklin County, Pennsylvania (1975) : United States. Natural Resources Conservation Service : Free Download, Borrow, and Streaming : Internet Archive

2026. United States Fish and Wildlife Service (USFWS). National Wetlands Inventory (NWI) – Wetlands Mapper. https://www.fws.gov/program/national-wetlands-inventory/wetlands-mapper.

2014. Washington County, Maryland. Forest Conservation Ordinance. https://www.washco-md.net/wp-content/uploads/legal-FCO.pdf.

2018. Washington County, Maryland. Ordinance No.: ORD-2018-20 An Ordinance Entitled "An Ordinance to Repeal and Reenact, With Amendments, An Ordinance Entitles "Ordinance for the Establishment of Agricultural Preservation Districts." https://www.washco-md.net/wp-content/uploads/ORD-2018-20.pdf.

2025. Washington County. Comprehensive Plan 2040. Comprehensive Plan 2040 - Washington County.

2018. Washington County. Zoning Ordinance. April 26, 2018. https://www.washco-md.net/wp-content/uploads/county-attny-Zoning-Ord-1.pdf.

2009. Washington Township Planning Commission. Washington Township and Waynesboro Borough Joint Comprehensive Plan. Washington Township, Franklin County, Pennsylvania. http://www.washtwp-franklin.org/joint-comprehensive-plan/

2009. Waynesboro Borough Planning Commission. Washington Township and Waynesboro Borough Joint Comprehensive Plan. Waynesboro Borough, Franklin County, Pennsylvania. https://www.waynesboropa.org/joint-comprehensive-plan/

Appendix A: GIS Data Sources

Appendix A: GIS Data Sources		
Siting Criteria	**Source**	**Description**
Land Use		
Number of parcels crossed by the ROW	Franklin County GIS Office (12/2025) Washington County GIS Office (12/2025)	Count of the number of parcels crossed by the ROW
Number of residences within 500 feet of the route centerline	Franklin County GIS Office (12/2025) and verified from aerial imagery Washington County GIS Office (12/2025) and verified from aerial imagery	Count of the number of residences within the ROW and within 100 feet, 250 feet and 500 feet of potential routes
Number of commercial buildings within 500 feet of the route centerline	Franklin County GIS Office (12/2025) and verified from aerial imagery Washington County GIS Office (12/2025) and verified from aerial imagery	Count of the number of commercial buildings within the ROW and within 100 feet, 250 feet and 500 feet of potential routes
Number of barns, outbuildings, sheds, garages, and silos in the ROW	Franklin County GIS Office (12/2025) and verified from aerial imagery Washington County GIS Office (12/2025) and verified from aerial imagery	Count of the number of barns, outbuildings, sheds, garages and silos in the ROW (excluding apparent abandoned features)

Appendix A: GIS Data Sources		
Siting Criteria	**Source**	**Description**
Mining areas crossed	PADEP Digitized Mining Areas (2026) and Maryland Mining Areas (2025)	Count of the number of mining areas crossed by the ROW
Quarries crossed	Aerial imagery review (2025)	Count of the number of quarries crossed by the ROW
Airfield and heliports within 1 mile of the route centerline	Bureau of Transportation (2025)	Distance from airfields and heliports
Land use acreage crossed by the 130 foot ROW over centerline (including Pasture/rangeland, cropland, tree farms/orchards, and forested areas)	NLCD (2024) with review of Google Earth Imagery	The NLCD 2024 (NLCD 2024) compiled by the Multi-Resolution Land Characteristics (MRLC) Consortium includes 15 classes of land cover from Landsat satellite imagery.
Acres of conservation easements crossed	PADUS (Protected Areas Database 2025)	Private conservation easements crossed by the routes from the NCED which is comprised of voluntarily reported conservation easement information from land trusts and public agencies
Acres of county agricultural easement land crossed	Franklin County GIS Office (12/2025)	Protected land that is devoted exclusively to agricultural production or devoted to and qualified for compensation under a federal land retirement or conservation program that is at least 10 acres in size, or produces an average yearly gross income of at least $2,500 during a 3-year period
	Washington County GIS Office (12/2025)	

Appendix A: GIS Data Sources		
Siting Criteria	**Source**	**Description**
Institutional uses (schools, places of worship and cemeteries) within 1000 feet (schools and places of worship) or 250 feet (cemeteries and hospitals) of the route centerline	Places of Worship (IRS 2024) Cemeteries and Hospitals USGS (2025)	This dataset includes the locations of cemeteries, churches, hospitals, parks, and schools. Features within 1000 feet (schools and places of worship) and 250 feet (cemeteries and hospitals) of potential routes were field verified.
Parks and recreation areas crossed by the ROW	USA Parks (2024) PADCNR Local Parks (2024)	USA Parks includes National and State parks and forests, along with County, Regional and Local parks within the United States. PADCNR local parks provides additional local parks within PA.
Scenic Byways	US Scenic Byways (Federal Highway Administration 2025)	Scenic byways per state. These are designated by the U.S Secretary of Transportation as National Scenic Byways and All-American Roads.
Federal/state land	USA Parks (2024)	USA Parks includes National and State parks and forests, along with County, Regional and Local parks within the United States
Number of archeological resources within the ROW and within 65 feet from centerline	PASHARE (accessed 12/17/2025) Medusa (accessed 12/17/2025)	Previously identified archeological resources acquired through Pennsylvania's Cultural Resources Geographic Information System (CRGIS) and Maryland's Medusa System

Appendix A: GIS Data Sources		
Siting Criteria	**Source**	**Description**
Number of historic architectural resources within the ROW, within 1 mile	PASHARE (accessed 12/17/2025) Medusa (accessed 12/17/2025)	Previously identified historic architectural resource sites and districts listed or eligible on the NRHP acquired through Pennsylvania's Cultural Resources Geographic Information System (CRGIS) and Maryland's Medusa System
Natural Environment		
Number of National hydrography dataset (NHD) stream and waterbody crossings within the ROW	USGS NHD (2024)	The NHD is a comprehensive set of digital spatial data prepared by the USGS that contains information about surface water features such as lakes, ponds, streams, rivers, springs and wells
High/Exceptional/Special Protection streams crossed	PADEP (2025, 2026)	PADEP Designated Use classifications of HQ, EV or TSF are considered Special Protection. Maryland does not classify special protection waters.
Riparian buffers crossed in MD	USGS NHD (2024)	MD regulates a 25 foot buffer off both banks of streams as a riparian buffer.
Acres of National Wetland Inventory (NWI) wetland crossings within the ROW	U.S. Fish and Wildlife Service (USFWS) (2025)	The NWI produces information on the characteristics, extent, and status of the Nation's wetlands and deepwater habitats

Appendix A: GIS Data Sources		
Siting Criteria	**Source**	**Description**
Acres of 100-year floodplain crossing within the ROW	Franklin County (2017 – Latest Study Effective Date) Washington County (2017 - Latest Study Effective Date)	Acres of 100-year floodplain within the ROW
Percent of prime farmland soils and soils of statewide importance within the ROW	USDA-NRCS SSURGO Database (2025)	Percent of soil associations crossed by the ROW characterized as prime farmland or farmland of statewide importance
Karst Topography within the ROW	USGS Karst Map (2024)	Dolomite or Limestone
Other Karst Features	PA DCNR Karst Features (2025) MDGS Karst Points (Washington County GIS Office 2025)	Karst point features (sinkholes, depressions, caves etc.)
Threatened, endangered, rare or sensitive species occurrence within the Project vicinity	PA Natural Heritage (NHA 2014), MD Sensitive Species Review Areas (2026)	Known occurrences; locations of potential habitat based on land use
Constructability		
Route length	Measured in GIS	Length of route in miles
Heavy angles	Measured in GIS	Anticipated number of angled structures <30 degrees based on preliminary design

Appendix A: GIS Data Sources		
Siting Criteria	**Source**	**Description**
Number of road crossings	US Dept of Transportation (2025)	Count of federal, state and local roadway crossings
Number of pipeline crossings	Rextag (2021)	Number of known natural gas and crude oil pipelines crossed by the transmission ROW
Number of transmission line crossings	Rextag (2021), visual comparison to PowerMap (2012)	Number of high voltage (100 kV or greater) transmission lines crossed by the ROW
Distance of steep slopes crossed	Washington County, MD (2021) PASDA LIDAR for Franklin County, PA (2017)	Miles of slope greater than 20 percent crossed by the routes
Length of transmission line parallel	Rextag (2021), visual comparison to PowerMap (2012)	Miles of the route parallel to existing high voltage transmission lines
Length of pipeline parallel	Rextag (2021), visual comparison to PowerMap (2012)	Miles of the route parallel to existing pipelines
Length of road parallel	US Dept of Transportation (2025)	Miles of the route parallel to existing roadways
Aerial Imagery		
Multiple	National Agriculture Imagery Program (NAIP) PA (2020), MD (2023)	Aerial imagery interpretation and verification across multiple metrics

Appendix B: Agency Correspondence

PENNSYLVANIA

AGENCY CONSULTATION AND RESPONSES

Transource, LLC
8500 Smith Mill Road
New Albany, OH 43054
Tel: 614.933.2600 main

January 31, 2017

Shawn Garvin, Regional Administrator
U.S. Environmental Protection Agency
Region 3
1650 Arch Street, Mail Code: 3RA00
Philadelphia, Pennsylvania 19103-2029

Subject: Transource, LLC
Independence Energy Connection Transmission Line Project

Dear Mr. Garvin,

Transource Energy, LLC (Transource) is proposing to build two new transmission lines and two new substations in Pennsylvania and Maryland as part of the Independence Energy Connection Project (Project). Transource was awarded the Project by PJM in August of 2016 to address transmission congestion across the Pennsylvania and Maryland border. Transource will be seeking approval to construct the Project from the Pennsylvania Public Utilities Commission and the Maryland Public Service Commission. The Project is in the initial data gathering phase and Transource is seeking input from agencies to help assist in the siting of the new transmission lines.

The Project components include two new 230 kV double circuit overhead transmission lines and two new 500/230 kV substations. The two transmission lines are separated by approximately 50 miles and are designated as either the East Route or West Route. The West route is approximately 23 miles and begins at the proposed Rice Substation in Franklin County, Pennsylvania and extends to the existing Ringgold Substation in Washington County, Maryland. The East route is approximately 13 miles starting at the proposed Furnace Run Substation in York County, Pennsylvania and extends to the existing Conastone Substation in Harford County, Maryland.

Transource has retained AECOM to assist with the transmission line siting and state applications necessary for approval of the proposed Project. At this time, AECOM is requesting consultation for the Project activities occurring Pennsylvania and Maryland. The Project is in the preliminary siting stages and therefore focal areas have been identified for the purposes of this consultation. USGS and road maps depicting the approximate focal areas are included for reference. The table below identifies those counties, and within Pennsylvania those municipalities, that fall within the Project focal areas.

Independence Energy Connection West and East Projects Counties and Municipalities		
Pennsylvania		
West Route – Franklin County		**East Route – York County**
Letterkenny Township	Quincy Township	Chanceford Township
Southampton Township	Mont Alto Borough	East Hopewell Township
Greene Township	Antrim Township	Hopewell Township
Chambersburg Borough	Greencastle Borough	Fawn Township
Hamilton Township	Washington Township	Fawn Grove Borough
Guilford Township	Waynesboro Borough	Peach Bottom Township
Maryland		
West Route – Washington County		**East Route – Harford County**

Transource and AECOM are looking to obtain information from your agency on potential issues and/or constraints within the identified focal areas that would need to be considered during the siting of the transmission lines. Any information that you could provide at this time, would be greatly appreciated. Transource will continue to provide updates to the EPA as the Project progresses and more specific routes are identified. We appreciate your assistance as we work through this iterative process and will be looking to schedule a meeting with your agency to further discuss this Project in the coming months.

Please contact me at (610) 832-8819 if you have any questions or require additional information and please provide any response to my attention at the AECOM address provided below.

Yours sincerely,



Heather Brewster
Project Manager
heather.brewster@aecom.com

AECOM
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures: USGS Based Focal Area Map
Road Based Focal Area Map

cc: Laurie Spears – Transource

Transource, LLC
8500 Smith Mill Road
New Albany, OH 43054
Tel: 614.933.2600 main

January 31, 2017

Lora Lattanzi, Project Leader
U.S. Fish & Wildlife Service
Pennsylvania Field Office, Northeast Region
110 Radnor Rd, Suite 101
State College, Pennsylvania 16801

Subject: Transource, LLC
Independence Energy Connection Transmission Line Project

Dear Ms. Lattanzi,

Transource Energy, LLC (Transource) is proposing to build two new transmission lines and two new substations in Pennsylvania and Maryland as part of the Independence Energy Connection Project (Project). Transource was awarded the Project by PJM in August of 2016 to address transmission congestion across the Pennsylvania and Maryland border. Transource will be seeking approval to construct the Project from the Pennsylvania Public Utilities Commission and the Maryland Public Service Commission. The Project is in the initial data gathering phase and Transource is seeking input from agencies to help assist in the siting of the new transmission lines.

The Project components include two new 230 kV double circuit overhead transmission lines and two new 500/230 kV substations. The two transmission lines are separated by approximately 50 miles and are designated as either the East Route or West Route. The West route is approximately 23 miles and begins at the proposed Rice Substation in Franklin County, Pennsylvania and extends to the existing Ringgold Substation in Washington County, Maryland. The East route is approximately 13 miles starting at the proposed Furnace Run Substation in York County, Pennsylvania and extends to the existing Conastone Substation in Harford County, Maryland.

Transource has retained AECOM to assist with the transmission line siting and state applications necessary for approval of the proposed Project. At this time, AECOM is requesting consultation specific to the Project activities occurring within Franklin and York Counties, Pennsylvania. The Project is in the preliminary siting stages and therefore focal areas have been identified for the purposes of this consultation. USGS and road maps depicting the approximate focal areas are included for reference. The table below identifies those municipalities that fall within the Project focal areas.

Independence Energy Connection West and East Projects Municipalities		
West Route – Franklin County		**East Route – York County**
Letterkenny Township	Quincy Township	Chanceford Township
Southampton Township	Mont Alto Borough	East Hopewell Township
Greene Township	Antrim Township	Hopewell Township
Chambersburg Borough	Greencastle Borough	Fawn Township
Hamilton Township	Washington Township	Fawn Grove Borough
Guilford Township	Waynesboro Borough	Peach Bottom Township

Transource and AECOM are looking to obtain information from your agency on potential issues and/or constraints within the identified focal areas that would need to be considered during the siting of the transmission lines. Any information that you could provide at this time, would be greatly appreciated. Once a formal route is selected, Transource will submit a Pennsylvania Natural Diversity Inventory (PNDI) request for review. Transource will continue to provide updates to the United States Fish and Wildlife Service (USFWS) as the Project progresses and more specific routes are identified. We appreciate your assistance as we work through this iterative process and will be looking to schedule a meeting with your agency to further discuss this Project in the coming months.

Please contact me at (610) 832-8819 if you have any questions or require additional information and please provide any response to my attention at the AECOM address provided below.

Yours sincerely,



Heather Brewster
Project Manager
heather.brewster@aecom.com

AECOM
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures: USGS Based Focal Area Map
Road Based Focal Area Map

cc: Laurie Spears – Transource

Brewster, Heather

From: Dershem, Bonnie <bonnie_dershem@fws.gov>
Sent: Tuesday, April 04, 2017 1:10 PM
To: Brewster, Heather
Subject: Transource Project

Heather,

Please conduct a PNDI search for your project and follow the instructions. Follow the link below:
https://conservationexplorer.dcnr.pa.gov

Bonnie

Bonnie Dershem
Endangered Species Biologist
U.S. Fish and Wildlife Service
Pennsylvania Field Office
110 Radnor Rd; Suite 101
State College, PA 16801
814-206-7453

Transource, LLC
8500 Smith Mill Road
New Albany, OH 43054
Tel: 614.933.2600 main

January 31, 2017

Wade Chandler, Chief Pennsylvania Section
U.S. Army Corps of Engineers
Baltimore District
Regulatory Branch
1631 South Atherton Street, Suite 102
State College, Pennsylvania 16801

Subject: Transource, LLC
Independence Energy Connection Transmission Line Project

Dear Mr. Chandler,

Transource Energy, LLC (Transource) is proposing to build two new transmission lines and two new substations in Pennsylvania and Maryland as part of the Independence Energy Connection Project (Project). Transource was awarded the Project by PJM in August of 2016 to address transmission congestion across the Pennsylvania and Maryland border. Transource will be seeking approval to construct the Project from the Pennsylvania Public Utilities Commission and the Maryland Public Service Commission. The Project is in the initial data gathering phase and Transource is seeking input from agencies to help assist in the siting of the new transmission lines.

The Project components include two new 230 kV double circuit overhead transmission lines and two new 500/230 kV substations. The two transmission lines are separated by approximately 50 miles and are designated as either the East Route or West Route. The West route is approximately 23 miles and begins at the proposed Rice Substation in Franklin County, Pennsylvania and extends to the existing Ringgold Substation in Washington County, Maryland. The East route is approximately 13 miles starting at the proposed Furnace Run Substation in York County, Pennsylvania and extends to the existing Conastone Substation in Harford County, Maryland.

Transource has retained AECOM to assist with the transmission line siting and state applications necessary for approval of the proposed Project. At this time, AECOM is requesting consultation specific to the Project activities occurring within Franklin and York Counties, Pennsylvania. The Project is in the preliminary siting stages and therefore focal areas have been identified for the purposes of this consultation. USGS and road maps depicting the approximate focal areas are included for reference. The table below identifies those municipalities that fall within the Project focal areas.

Independence Energy Connection West and East Projects Municipalities		
West Route – Franklin County		**East Route – York County**
Letterkenny Township	Quincy Township	Chanceford Township
Southampton Township	Mont Alto Borough	East Hopewell Township
Greene Township	Antrim Township	Hopewell Township
Chambersburg Borough	Greencastle Borough	Fawn Township
Hamilton Township	Washington Township	Fawn Grove Borough
Guilford Township	Waynesboro Borough	Peach Bottom Township

Transource and AECOM are looking to obtain information from your agency on potential issues and/or constraints within the identified focal areas that would need to be considered during the siting of the transmission lines. Any information that you could provide at this time, would be greatly appreciated. Once a formal route is selected, Transource will submit a pre-application meeting request. Transource will continue to provide updates to the United States Army Corps of Engineers (USACE) as the Project progresses and more specific routes are identified. We appreciate your assistance as we work through this iterative process and will be looking to schedule a meeting with your agency to further discuss this Project in the coming months.

Please contact me at (610) 832-8819 if you have any questions or require additional information and please provide any response to my attention at the AECOM address provided below.

Yours sincerely,



Heather Brewster
Project Manager
heather.brewster@aecom.com

AECOM
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures: USGS Based Focal Area Map
Road Based Focal Area Map

cc: Laurie Spears – Transource

Transource, LLC
8500 Smith Mill Road
New Albany, OH 43054
Tel: 614.933.2600 main

January 31, 2017

Daniel Naylor, Supervisor
Pennsylvania Department of Agriculture - Region 6
2301 North Cameron Street, Suite G-6
Harrisburg, Pennsylvania 17110-0184

Subject: Transource, LLC
Independence Energy Connection Transmission Line Project

Dear Mr. Naylor,

Transource Energy, LLC (Transource) is proposing to build two new transmission lines and two new substations in Pennsylvania and Maryland as part of the Independence Energy Connection Project (Project). Transource was awarded the Project by PJM in August of 2016 to address transmission congestion across the Pennsylvania and Maryland border. Transource will be seeking approval to construct the Project from the Pennsylvania Public Utilities Commission and the Maryland Public Service Commission. The Project is in the initial data gathering phase and Transource is seeking input from agencies to help assist in the siting of the new transmission lines.

The Project components include two new 230 kV double circuit overhead transmission lines and two new 500/230 kV substations. The two transmission lines are separated by approximately 50 miles and are designated as either the East Route or West Route. The West route is approximately 23 miles and begins at the proposed Rice Substation in Franklin County, Pennsylvania and extends to the existing Ringgold Substation in Washington County, Maryland. The East route is approximately 13 miles starting at the proposed Furnace Run Substation in York County, Pennsylvania and extends to the existing Conastone Substation in Harford County, Maryland.

Transource has retained AECOM to assist with the transmission line siting and state applications necessary for approval of the proposed Project. At this time, AECOM is requesting consultation specific to the Project activities occurring within Franklin and York Counties, Pennsylvania. The Project is in the preliminary siting stages and therefore focal areas have been identified for the purposes of this consultation. USGS and road maps depicting the approximate focal areas are included for reference. The table below identifies those municipalities that fall within the Project focal areas.

Independence Energy Connection West and East Projects Municipalities		
West Route – Franklin County		**East Route – York County**
Letterkenny Township	Quincy Township	Chanceford Township
Southampton Township	Mont Alto Borough	East Hopewell Township
Greene Township	Antrim Township	Hopewell Township
Chambersburg Borough	Greencastle Borough	Fawn Township
Hamilton Township	Washington Township	Fawn Grove Borough
Guilford Township	Waynesboro Borough	Peach Bottom Township

Transource and AECOM are looking to obtain information from your agency on potential issues and/or constraints within the identified focal areas that would need to be considered during the siting of the transmission lines. Any information that you could provide at this time, would be greatly appreciated. Transource will continue to provide updates to the Pennsylvania Department of Agriculture (PADA) as the Project progresses and more specific routes are identified. We appreciate your assistance as we work through this iterative process and will be looking to schedule a meeting with your agency to further discuss this Project in the coming months.

Please contact me at (610) 832-8819 if you have any questions or require additional information and please provide any response to my attention at the AECOM address provided below.

Yours sincerely,



Heather Brewster
Project Manager
heather.brewster@aecom.com

AECOM
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures: USGS Based Focal Area Map
Road Based Focal Area Map

cc: Laurie Spears – Transource

Transource, LLC
8500 Smith Mill Road
New Albany, OH 43054
Tel: 614.933.2600 main

January 31, 2017

Ellen Shultzabarger, Division Chief
Pennsylvania Department of Conservation and Natural Resources
Conservation Science and Ecological Services Section
Rachel Carson State Office Building
400 Market Street, 6th Floor
Harrisburg, Pennsylvania 17105-8552

Subject: Transource, LLC
Independence Energy Connection Transmission Line Project

Dear Ms. Shultzabarger,

Transource Energy, LLC (Transource) is proposing to build two new transmission lines and two new substations in Pennsylvania and Maryland as part of the Independence Energy Connection Project (Project). Transource was awarded the Project by PJM in August of 2016 to address transmission congestion across the Pennsylvania and Maryland border. Transource will be seeking approval to construct the Project from the Pennsylvania Public Utilities Commission and the Maryland Public Service Commission. The Project is in the initial data gathering phase and Transource is seeking input from agencies to help assist in the siting of the new transmission lines.

The Project components include two new 230 kV double circuit overhead transmission lines and two new 500/230 kV substations. The two transmission lines are separated by approximately 50 miles and are designated as either the East Route or West Route. The West route is approximately 23 miles and begins at the proposed Rice Substation in Franklin County, Pennsylvania and extends to the existing Ringgold Substation in Washington County, Maryland. The East route is approximately 13 miles starting at the proposed Furnace Run Substation in York County, Pennsylvania and extends to the existing Conastone Substation in Harford County, Maryland.

Transource has retained AECOM to assist with the transmission line siting and state applications necessary for approval of the proposed Project. At this time, AECOM is requesting consultation specific to the Project activities occurring within Franklin and York Counties, Pennsylvania. The Project is in the preliminary siting stages and therefore focal areas have been identified for the purposes of this consultation. USGS and road maps depicting the approximate focal areas are included for reference. The table below identifies those municipalities that fall within the Project focal areas.

Independence Energy Connection West and East Projects Municipalities		
West Route – Franklin County		**East Route – York County**
Letterkenny Township	Quincy Township	Chanceford Township
Southampton Township	Mont Alto Borough	East Hopewell Township
Greene Township	Antrim Township	Hopewell Township
Chambersburg Borough	Greencastle Borough	Fawn Township
Hamilton Township	Washington Township	Fawn Grove Borough
Guilford Township	Waynesboro Borough	Peach Bottom Township

Transource and AECOM are looking to obtain information from your agency on potential issues and/or constraints within the identified focal areas that would need to be considered during the siting of the transmission lines. Any information that you could provide at this time, would be greatly appreciated. Once a formal route is selected, Transource will submit a Pennsylvania Natural Diversity Inventory (PNDI) request for review. Transource will continue to provide updates to the Pennsylvania Department of Conservation and Natural Resources (PADCNR) as the Project progresses and more specific routes are identified. We appreciate your assistance as we work through this iterative process and will be looking to schedule a meeting with your agency to further discuss this Project in the coming months.

Please contact me at (610) 832-8819 if you have any questions or require additional information and please provide any response to my attention at the AECOM address provided below.

Yours sincerely,



Heather Brewster
Project Manager
heather.brewster@aecom.com

AECOM
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures: USGS Based Focal Area Map
Road Based Focal Area Map

cc: Laurie Spears – Transource

Brewster, Heather

From: Braund, Jaclyn <c-jbraund@pa.gov>
Sent: Tuesday, February 07, 2017 12:45 PM
To: Brewster, Heather
Subject: Independence Energy Connection Transmission Line Project

Hi Heather,

I have received the Independence Energy Connection Transmission Line Project recently mailed to DCNR. At this time there is no further information I have to give to AECOM for the Project until the PNDI is completed. Please let me know if you need any assistance with the PNDI.

Thanks,

Jaci Braund | Ecological Information Specialist
PA Department of Conservation & Natural Resources
Bureau of Forestry | Natural Heritage Section
400 Market Street | Harrisburg, PA 17105
Phone: 717.214.3813 | Fax: 717.772.0271
E-mail: c-jbraund@pa.gov

Transource, LLC
8500 Smith Mill Road
New Albany, OH 43054
Tel: 614.933.2600 main

January 31, 2017

Joseph Adams, Regional Director
PA Department of Environmental Protection
South-central Regional Office
909 Elmerton Ave
Harrisburg, Pennsylvania 17110-8200

Subject: Transource, LLC
Independence Energy Connection Transmission Line Project

Dear Mr. Adams,

Transource Energy, LLC (Transource) is proposing to build two new transmission lines and two new substations in Pennsylvania and Maryland as part of the Independence Energy Connection Project (Project). Transource was awarded the Project by PJM in August of 2016 to address transmission congestion across the Pennsylvania and Maryland border. Transource will be seeking approval to construct the Project from the Pennsylvania Public Utilities Commission and the Maryland Public Service Commission. The Project is in the initial data gathering phase and Transource is seeking input from agencies to help assist in the siting of the new transmission lines.

The Project components include two new 230 kV double circuit overhead transmission lines and two new 500/230 kV substations. The two transmission lines are separated by approximately 50 miles and are designated as either the East Route or West Route. The West route is approximately 23 miles and begins at the proposed Rice Substation in Franklin County, Pennsylvania and extends to the existing Ringgold Substation in Washington County, Maryland. The East route is approximately 13 miles starting at the proposed Furnace Run Substation in York County, Pennsylvania and extends to the existing Conastone Substation in Harford County, Maryland.

Transource has retained AECOM to assist with the transmission line siting and state applications necessary for approval of the proposed Project. At this time, AECOM is requesting consultation specific to the Project activities occurring within Franklin and York Counties, Pennsylvania. The Project is in the preliminary siting stages and therefore focal areas have been identified for the purposes of this consultation. USGS and road maps depicting the approximate focal areas are included for reference. The table below identifies those municipalities that fall within the Project focal areas.

Independence Energy Connection West and East Projects Municipalities		
West Route – Franklin County		**East Route – York County**
Letterkenny Township	Quincy Township	Chanceford Township
Southampton Township	Mont Alto Borough	East Hopewell Township
Greene Township	Antrim Township	Hopewell Township
Chambersburg Borough	Greencastle Borough	Fawn Township
Hamilton Township	Washington Township	Fawn Grove Borough
Guilford Township	Waynesboro Borough	Peach Bottom Township

Transource and AECOM are looking to obtain information from your agency on potential issues and/or constraints within the identified focal areas that would need to be considered during the siting of the transmission lines. Any information that you could provide at this time, would be greatly appreciated. Once a formal route is selected, Transource will submit a pre-application meeting request. Transource will continue to provide updates to the Pennsylvania Department of Environmental Protection (PADEP) as the Project progresses and more specific routes are identified. We appreciate your assistance as we work through this iterative process and will be looking to schedule a meeting with your agency to further discuss this Project in the coming months.

Please contact me at (610) 832-8819 if you have any questions or require additional information and please provide any response to my attention at the AECOM address provided below.

Yours sincerely,



Heather Brewster
Project Manager
heather.brewster@aecom.com

AECOM
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures: USGS Based Focal Area Map
Road Based Focal Area Map

cc: Laurie Spears – Transource

Transource, LLC
8500 Smith Mill Road
New Albany, OH 43054
Tel: 614.933.2600 main

January 31, 2017

John Arway, Executive Director
Pennsylvania Fish and Boat Commission
Natural Diversity Section
1601 Elmerton Ave
Harrisburg, Pennsylvania 17106

Subject: Transource, LLC
Independence Energy Connection Transmission Line Project

Dear Mr. Arway,

Transource Energy, LLC (Transource) is proposing to build two new transmission lines and two new substations in Pennsylvania and Maryland as part of the Independence Energy Connection Project (Project). Transource was awarded the Project by PJM in August of 2016 to address transmission congestion across the Pennsylvania and Maryland border. Transource will be seeking approval to construct the Project from the Pennsylvania Public Utilities Commission and the Maryland Public Service Commission. The Project is in the initial data gathering phase and Transource is seeking input from agencies to help assist in the siting of the new transmission lines.

The Project components include two new 230 kV double circuit overhead transmission lines and two new 500/230 kV substations. The two transmission lines are separated by approximately 50 miles and are designated as either the East Route or West Route. The West route is approximately 23 miles and begins at the proposed Rice Substation in Franklin County, Pennsylvania and extends to the existing Ringgold Substation in Washington County, Maryland. The East route is approximately 13 miles starting at the proposed Furnace Run Substation in York County, Pennsylvania and extends to the existing Conastone Substation in Harford County, Maryland.

Transource has retained AECOM to assist with the transmission line siting and state applications necessary for approval of the proposed Project. At this time, AECOM is requesting consultation specific to the Project activities occurring within Franklin and York Counties, Pennsylvania. The Project is in the preliminary siting stages and therefore focal areas have been identified for the purposes of this consultation. USGS and road maps depicting the approximate focal areas are included for reference. The table below identifies those municipalties that fall within the Project focal areas.

Independence Energy Connection West and East Projects Municipalities		
West Route – Franklin County		**East Route – York County**
Letterkenny Township	Quincy Township	Chanceford Township
Southampton Township	Mont Alto Borough	East Hopewell Township
Greene Township	Antrim Township	Hopewell Township
Chambersburg Borough	Greencastle Borough	Fawn Township
Hamilton Township	Washington Township	Fawn Grove Borough
Guilford Township	Waynesboro Borough	Peach Bottom Township

Transource and AECOM are looking to obtain information from your agency on potential issues and/or constraints within the identified focal areas that would need to be considered during the siting of the transmission lines. Any information that you could provide at this time, would be greatly appreciated. Once a formal route is selected, Transource will submit a Pennsylvania Natural Diversity Inventory (PNDI) request for review. Transource will continue to provide updates to the Pennsylvania Fish and Boat Commission (PAFBC) as the Project progresses and more specific routes are identified. We appreciate your assistance as we work through this iterative process and will be looking to schedule a meeting with your agency to further discuss this Project in the coming months.

Please contact me at (610) 832-8819 if you have any questions or require additional information and please provide any response to my attention at the AECOM address provided below.

Yours sincerely,



Heather Brewster
Project Manager
heather.brewster@aecom.com

AECOM
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures: USGS Based Focal Area Map
Road Based Focal Area Map

cc: Laurie Spears – Transource

Transource, LLC
8500 Smith Mill Road
New Albany, OH 43054
Tel: 614.933.2600 main

January 31, 2017

Bradley J. Meyers, Director
Pennsylvania Game Commission
Southcentral Region
8627 William Penn Highway
Huntingdon, Pennsylvania 16652

Subject: Transource, LLC
Independence Energy Connection Transmission Line Project

Dear Mr. Meyers,

Transource Energy, LLC (Transource) is proposing to build two new transmission lines and two new substations in Pennsylvania and Maryland as part of the Independence Energy Connection Project (Project). Transource was awarded the Project by PJM in August of 2016 to address transmission congestion across the Pennsylvania and Maryland border. Transource will be seeking approval to construct the Project from the Pennsylvania Public Utilities Commission and the Maryland Public Service Commission. The Project is in the initial data gathering phase and Transource is seeking input from agencies to help assist in the siting of the new transmission lines.

The Project components include two new 230 kV double circuit overhead transmission lines and two new 500/230 kV substations. The two transmission lines are separated by approximately 50 miles and are designated as either the East Route or West Route. The West route is approximately 23 miles and begins at the proposed Rice Substation in Franklin County, Pennsylvania and extends to the existing Ringgold Substation in Washington County, Maryland. The East route is approximately 13 miles starting at the proposed Furnace Run Substation in York County, Pennsylvania and extends to the existing Conastone Substation in Harford County, Maryland.

Transource has retained AECOM to assist with the transmission line siting and state applications necessary for approval of the proposed Project. At this time, AECOM is requesting consultation specific to the Project activities occurring within Franklin and York Counties, Pennsylvania. The Project is in the preliminary siting stages and therefore focal areas have been identified for the purposes of this consultation. USGS and road maps depicting the approximate focal areas are included for reference. The table below identifies those municipalities that fall within the Project focal areas.

Independence Energy Connection West and East Projects Municipalities		
West Route – Franklin County		**East Route – York County**
Letterkenny Township	Quincy Township	Chanceford Township
Southampton Township	Mont Alto Borough	East Hopewell Township
Greene Township	Antrim Township	Hopewell Township
Chambersburg Borough	Greencastle Borough	Fawn Township
Hamilton Township	Washington Township	Fawn Grove Borough
Guilford Township	Waynesboro Borough	Peach Bottom Township

Transource and AECOM are looking to obtain information from your agency on potential issues and/or constraints within the identified focal areas that would need to be considered during the siting of the transmission lines. Any information that you could provide at this time, would be greatly appreciated. Once a formal route is selected, Transource will submit a Pennsylvania Natural Diversity Inventory (PNDI) request for review. Transource will continue to provide updates to the Pennsylvania Game Commission (PGC) as the Project progresses and more specific routes are identified. We appreciate your assistance as we work through this iterative process and will be looking to schedule a meeting with your agency to further discuss this Project in the coming months.

Please contact me at (610) 832-8819 if you have any questions or require additional information and please provide any response to my attention at the AECOM address provided below.

Yours sincerely,



Heather Brewster
Project Manager
heather.brewster@aecom.com

AECOM
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures: USGS Based Focal Area Map
Road Based Focal Area Map

cc: Laurie Spears – Transource

Transource, LLC
8500 Smith Mill Road
New Albany, OH 43054
Tel: 614.933.2600 main

January 31, 2017

Andrea L. MacDonald
Pennsylvania Historical & Museum Commission, Bureau Director
400 North Street
Commonwealth Keystone Building, 2nd Floor
Harrisburg, Pennsylvania 17120-0093

Subject: Transource, LLC
Independence Energy Connection Transmission Line Project

Dear Ms. MacDonald,

Transource Energy, LLC (Transource) is proposing to build two new transmission lines and two new substations in Pennsylvania and Maryland as part of the Independence Energy Connection Project (Project). Transource was awarded the Project by PJM in August of 2016 to address transmission congestion across the Pennsylvania and Maryland border. Transource will be seeking approval to construct the Project from the Pennsylvania Public Utilities Commission and the Maryland Public Service Commission. The Project is in the initial data gathering phase and Transource is seeking input from agencies to help assist in the siting of the new transmission lines.

The Project components include two new 230 kV double circuit overhead transmission lines and two new 500/230 kV substations. The two transmission lines are separated by approximately 50 miles and are designated as either the East Route or West Route. The West route is approximately 23 miles and begins at the proposed Rice Substation in Franklin County, Pennsylvania and extends to the existing Ringgold Substation in Washington County, Maryland. The East route is approximately 13 miles starting at the proposed Furnace Run Substation in York County, Pennsylvania and extends to the existing Conastone Substation in Harford County, Maryland.

Transource has retained AECOM to assist with the transmission line siting and state applications necessary for approval of the proposed Project. At this time, AECOM is requesting consultation specific to the Project activities occurring within Franklin and York Counties, Pennsylvania. The Project is in the preliminary siting stages and therefore focal areas have been identified for the purposes of this consultation. USGS and road maps depicting the approximate focal areas are included for reference. The table below identifies those municipalities that fall within the Project focal areas.

Independence Energy Connection West and East Projects Municipalities		
West Route – Franklin County		**East Route – York County**
Letterkenny Township	Quincy Township	Chanceford Township
Southampton Township	Mont Alto Borough	East Hopewell Township
Greene Township	Antrim Township	Hopewell Township
Chambersburg Borough	Greencastle Borough	Fawn Township
Hamilton Township	Washington Township	Fawn Grove Borough
Guilford Township	Waynesboro Borough	Peach Bottom Township

Transource and AECOM are looking to obtain information from your agency on potential issues and/or constraints within the identified focal areas that would need to be considered during the siting of the transmission lines. Any information that you could provide at this time, would be greatly appreciated. Once a formal route is selected, Transource will submit a Project review request. Transource will continue to provide updates to the Pennsylvania Historic Museum Commission (PHMC) as the Project progresses and more specific routes are identified. We appreciate your assistance as we work through this iterative process and will be looking to schedule a meeting with your agency to further discuss this Project in the coming months.

Please contact me at (610) 832-8819 if you have any questions or require additional information and please provide any response to my attention at the AECOM address provided below.

Yours sincerely,



Heather Brewster
Project Manager
heather.brewster@aecom.com

AECOM
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures: USGS Based Focal Area Map
Road Based Focal Area Map

cc: Laurie Spears – Transource

Pennsylvania State Historic Preservation Office
PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

March 6, 2017

Heather Brewster
AECOM
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

ER 2017-0726-042-A

Dear Ms. Brewster:

Thank you for submitting information concerning the above referenced project. The Pennsylvania State Historic Preservation Office (PA SHPO) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. These laws include consideration of the project's potential effects on both historic and archaeological resources.

Archaeological Resources

Both of the proposed focus areas contain a number of previously recorded archaeological sites. Please have an AECOM archaeological professional who has a secure password to archaeological site locations in our Cultural Resources Geographic Information system look at these areas before routes or alternative routes are selected.

Above Ground Resources

A preliminary review of this project indicates that there may be National Register-eligible historic buildings, structures, districts, and objects in the project area. In order to facilitate the review process, project planners must conduct surveys to identify these resources (both previously identified and newly identified) before final plans are developed. For any new proposed structures/lines and/or those proposed structures that will increase in height above 20' from the existing average, please consult our *Guidelines for Projects with Potential Visual Effects in Pennsylvania (September 2014)* available from the "Forms and Guidance" page on our website: http://www.phmc.pa.gov/Preservation for instructions, including delineating an Area of Potential Effects, identifying historic properties, and assessing effects.

Given the size and/or complexity of the above listed project, a reconnaissance survey is necessary to characterize the age, style, and types of resources in the Area of Potential Effect (APE). The reconnaissance survey should also provide the methodology for more detailed (intensive) level survey to assess National Register eligibility of resources in the APE. More guidance on preparation of reconnaissance surveys is found in *Guidelines for Architectural Investigations in Pennsylvania* (2014), available via our website: http://www.phmc.pa.gov/Preservation/About/Documents/Architectural-Guidelines.pdf

To assist you in your identification of known above ground resources, the State Historic Preservation Office (SHPO) maintains records of National Register listed and eligible and

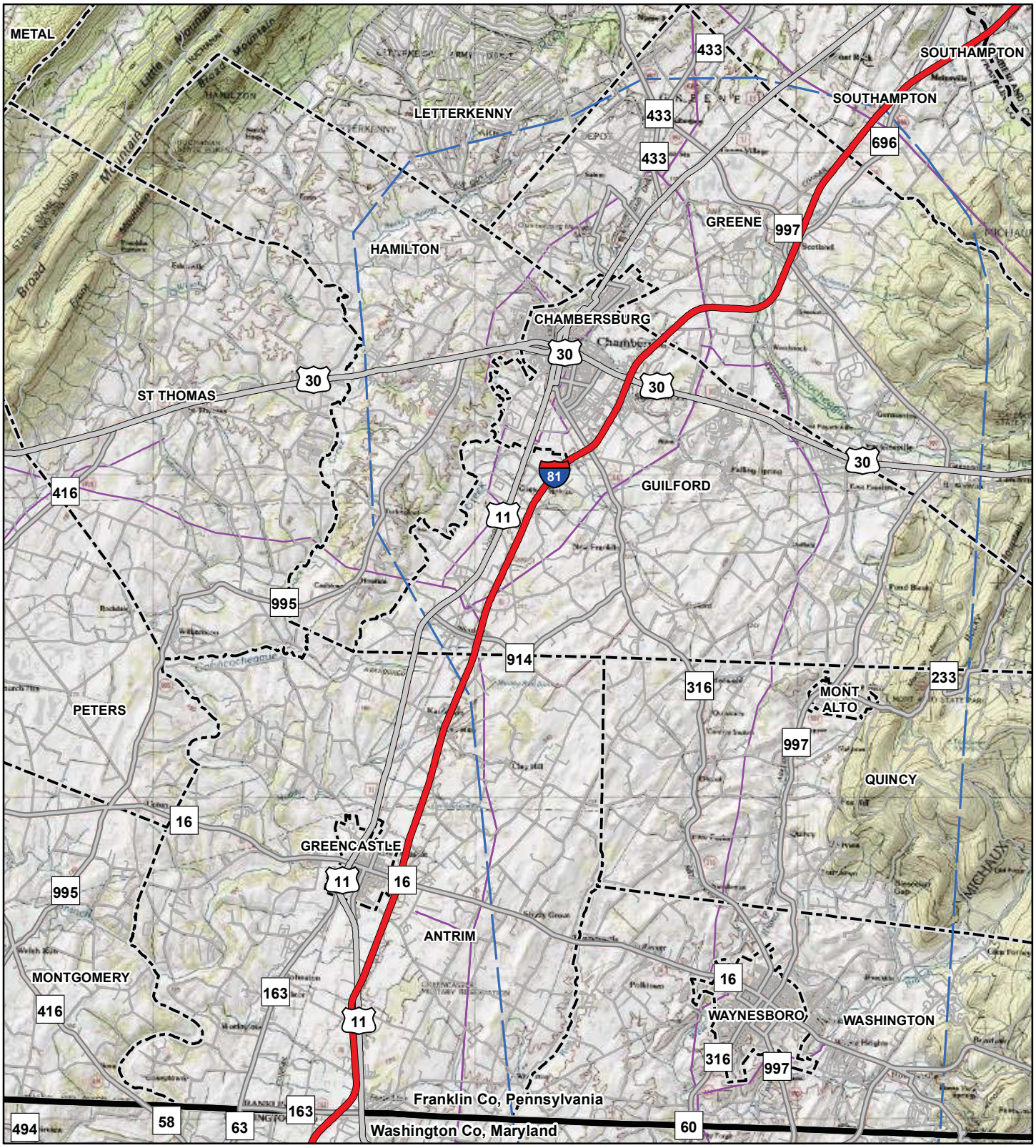
previously identified resources. Information on many of these resources is available on our web based Cultural Resources Geographic Information System (CRGIS) http://crgis.state.pa.us. Additional information is available in the survey reports and files of the PHMC-BHP's research room. Please consult the unpublished reports and files to determine what is known in the project area and whether the previous survey information may require an update. In addition, a comparison of historic (available at pennpilot.psu.edu) and current aerial mapping would be useful for identifying changes to the landscape over time as well as additional resources within the project vicinity that meet the National Register 50-year-age consideration.

For larger or more complex projects, you may also want to consult with the appropriate staff reviewer on the delineation and justification of the boundary of the APE. Their contact information is listed below.

If you have any questions regarding archaeological resources, please contact me at 717-772-0925 or dmclearen@pa.gov. If you have questions regarding above ground resources, please contact Cheryl L. Nagle at 717.772.4519 or chnagle@pa.gov.

Sincerely,

Douglas C. McLearen, Chief
Division of Archaeology and Protection



Legend

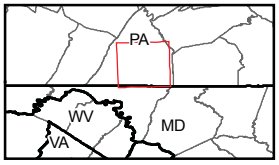
- Existing Transmission Lines
- Project Focal Area
- Municipal Boundary
- County Boundary
- State Boundary

N

0 7,000 14,000 28,000 Feet

Coordinate System:
NAD 1983 UTM Zone 18N
Projection: Transverse Mercator
Linear Unit: Meter

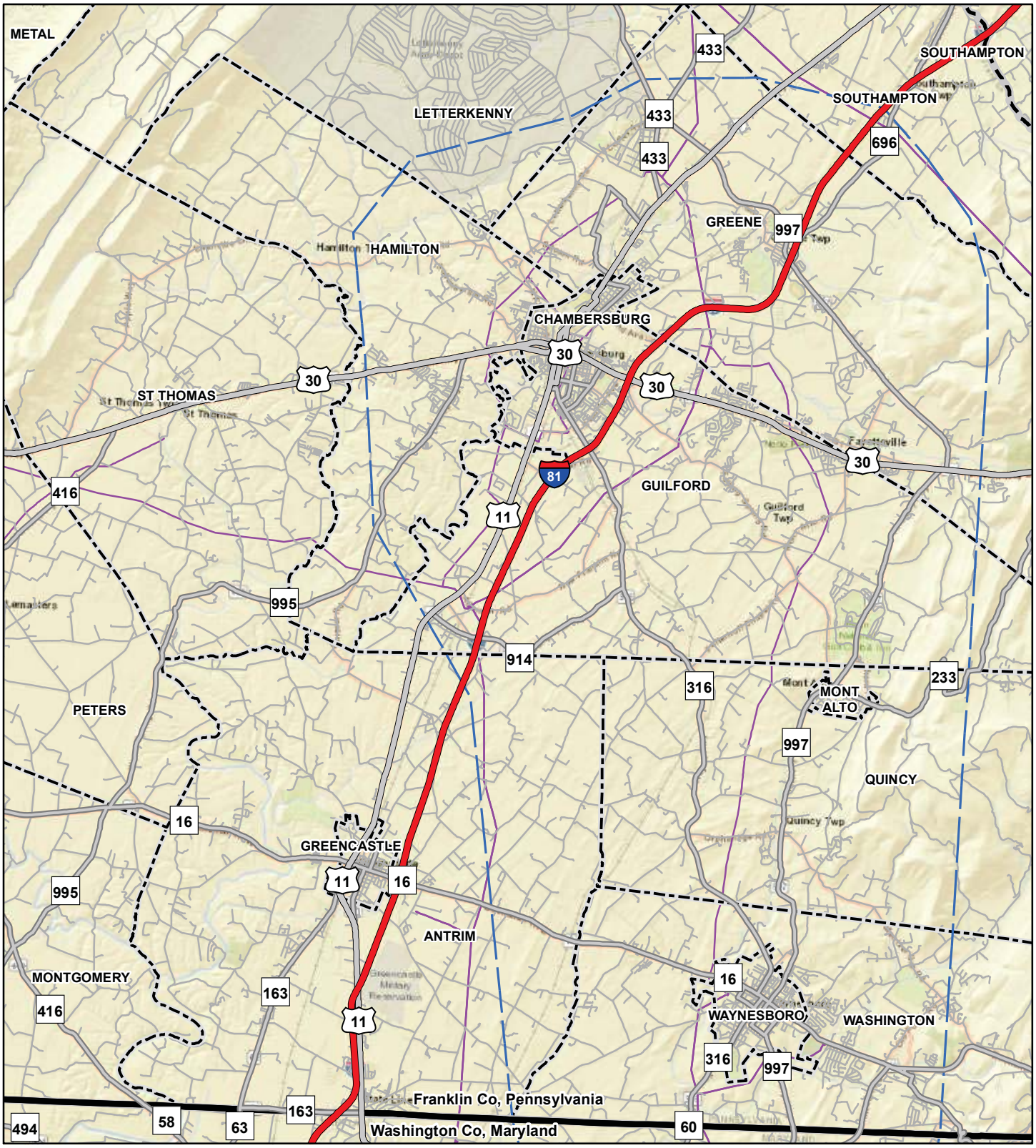
Data Sources:
Platts Power Map Transmission Line (2011)
USA Topo Maps (ESRI)



TRANSOURCE

Job: 60529006	Independence Energy Connection - West
Prepared by: NB/BSF	Transource, LLC
Checked by: HB	Focal Area - PA
Date: 1/30/2017	Confidential - Draft Work Product

S:\Projects\IMS\AEP\PAMDSITING\Maps\Focal Area Maps\Rice_Ringgold_PA_20170130.mxd



Legend

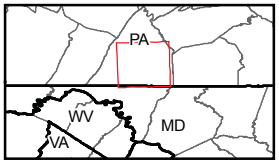
- Existing Transmission Lines
- Project Focal Area
- Municipal Boundary
- County Boundary
- State Boundary

N

0 7,000 14,000 28,000 Feet

Coordinate System:
NAD 1983 UTM Zone 18N
Projection: Transverse Mercator
Linear Unit: Meter

Data Sources:
Platts Power Map Transmission Line (2011)
USA Topo Maps (ESRI)



TRANSOURCE

Job: 60529006	Independence Energy Connection - West
Prepared by: NB/BSF	Transource, LLC
Checked by: HB	Focal Area - PA
Date: 1/30/2017	Confidential - Draft Work Product

S:\Projects\IMS\AEP\PAMDSITING\Maps\Focal Area Maps\Rice_Ringgold_PA_20170130.mxd

Transource, LLC
8500 Smith Mill Road
New Albany, OH 43054
Tel: 614.933.2600 main

November 8, 2017

Hathaway Jones, Management Analyst
United States Department of Agriculture
Natural Resources Conservation Service
359 East Park Drive, Suite 2
Harrisburg, Pennsylvania 17111

Subject: Transource Pennsylvania, LLC
Independence Energy Connection Project
Natural Resources Conservation Service Agricultural Easements
York and Franklin Counties, Pennsylvania

Dear Ms. Hathaway,

Transource Pennsylvania, LLC (Transource PA) is proposing to build two new transmission lines and two new substations in Pennsylvania as part of the Independence Energy Connection Project (Project). Transource PA was awarded the Project by PJM in August of 2016 to address transmission congestion across the Pennsylvania and Maryland border (Transource Maryland, LLC, an affiliate, is responsible for the construction of related facilities in Maryland). Transource PA will be seeking approval to construct the Project from the Pennsylvania Public Utilities Commission.

The Project components include two new 230 kV double circuit overhead transmission lines and two new 500/230 kV substations. The two transmission lines are separated by approximately 50 miles and are designated as the East Route and the West Route. The West Route is approximately 29 miles (24 miles in Pennsylvania) and begins at the proposed Rice Substation in Franklin County, Pennsylvania, and extends to the existing Ringgold Substation in Washington County, Maryland. The East Route is approximately 16 miles (13 in Pennsylvania) starting at the proposed Furnace Run Substation in York County, Pennsylvania, and extends to the existing Conastone Substation in Harford County, Maryland. Both transmission lines will require a 130 foot wide right-of-way (ROW) for both installation and operation. At this time, Transource PA has announced proposed routes for this Project after working through the siting process and completing public open houses.

Transource PA is formally requesting the Natural Resources Conservation Service's (NRCS) review of the proposed routes in Pennsylvania as it relates to Stewardship Lands Easements, including those under the Agricultural Conservation Easement Program (ACEP), formerly referred to as the Farm and Ranch Lands Protection Program (FRPP). Per past correspondence with NRCS, Transource PA is providing the following requested information including parcels identified along the ROW of the proposed routes, mapping, shapefiles of the routes, and a summary table of the identified parcels.

Transource PA would like to clarify that at this time the information used to identify the parcel boundaries and landowners is based on public county tax parcel data. Civil survey of property lines and deed title search is pending to finalize this information. With the public announcement of the proposed routes, landowners within the 130 foot ROW, based on county parcel data, and those within close proximity were notified via certified mailing. Until parcel data can be verified using field information, additional parcels within close proximity of the routes have also been included with the provided information. Final collection of field surveyed parcel lines may determine whether these parcels can be avoided.

Enclosed with this request, Transource PA is providing the agricultural easement deeds for those properties along the proposed routes identified as having NRCS easements. Those documents are provided herein for NRCS's information.

We appreciate your review and assistance with this request. Please contact me at (610) 832-8819 if you have any questions or require additional information and please provide any response to my attention at the AECOM address provided below.

Yours sincerely,



Heather Brewster
Project Manager
heather.brewster@aecom.com

AECOM
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures: Proposed Route Aerial Maps
Shapefile of Proposed Routes w/Parcel Data
List of Notified Landowner with Parcel Data
Agricultural Easement Deeds

cc: Laurie Spears – Transource

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF AGRICULTURE

November 29, 2017

Ms. Laurie Spears
Transource®
Senior Siting Specialist
8500 Smith Mill Road
New Albany, OH 43054

Dear Ms. Spears:

RE: The Independent Energy Connection project and potential impacts to farmland.

It has come to my attention that Transource ® is developing the Independence Energy Connection (IEC) project, to include a new overhead electric transmission project. I understand that the project will be built in two segments, East and West, and will include land primarily in Franklin and York counties in Pennsylvania, land that is some of the richest and most productive agricultural land in the world. This is of concern to me as agriculture is a leading economic endeavor in Pennsylvania. The agriculture industry contributes over $75 billion to our economy statewide. Products grown and processed here provide food for our nation, support jobs and a diverse economy.

In addition, Pennsylvania leads the nation in farmland preservation through the purchase of permanent agricultural conservation easements—and both York and Franklin counties have two of the most robust programs in the state with more than 58,807 acres preserved. In fact, over $107 million in public funds have been invested in preserving farmland in these two counties alone.

Farm owners have given up the right to use their properties for other uses in support of maintaining a thriving agricultural industry in this region. Many are now questioning how the Independent Energy Connection project will impact their farming operations and why there are no additional protections or considerations for preserved farms. Since farmland is open and cleared it is often viewed as path of least resistance by comparison to other impacted resources. However, it cannot be overstated that farmland is valuable to both the farm owners whose livelihood depends on it and to the taxpayers who have made significant investments in preserving it.

In summary, as Transource® prepares to file with the Public Utility Commission later this year, I urge you to be mindful of agriculture and particularly preserved farms in planning and siting of this project. Please feel free to contact Doug Wolfgang, Director of Farmland Preservation, at (717) 783-3167 if there are questions or you would like further discussion.

Sincerely,

Russell C. Redding
Secretary

AGENCY EMAILS

Brewster, Heather

From: Bess, Damian A CIV USARMY USAMC (US) <damian.a.bess.civ@mail.mil>
Sent: Tuesday, May 16, 2017 6:11 PM
To: Brewster, Heather
Subject: RE: [Non-DoD Source] RE: meeting info for Letterkenny (UNCLASSIFIED)

CLASSIFICATION: UNCLASSIFIED

Heather

Thanks for your visit, it was very informative. If you wouldn't mind, please let me know when and where any public meetings are planned and what outlet you advertise it on so that we can keep track. We will be forwarding our boundary data to assist your planning.

Damian

-----Original Message-----
From: Brewster, Heather [mailto:Heather.Brewster@aecom.com]
Sent: Thursday, May 11, 2017 10:07 AM
To: Bess, Damian A CIV USARMY USAMC (US) <damian.a.bess.civ@mail.mil>
Subject: [Non-DoD Source] RE: meeting info for Letterkenny (UNCLASSIFIED)

All active links contained in this email were disabled. Please verify the identity of the sender, and confirm the authenticity of all links contained within the message prior to copying and pasting the address to a Web browser.

Thank you Damian. We will likely complete the form and go ahead and send it in via the provided email address.

Thank you ~Heather Brewster
610-832-8819

-----Original Message-----
From: Bess, Damian A CIV USARMY USAMC (US) [Caution-mailto:damian.a.bess.civ@mail.mil]
Sent: Thursday, May 11, 2017 10:02 AM
To: Brewster, Heather
Subject: meeting info for Letterkenny (UNCLASSIFIED)

CLASSIFICATION: UNCLASSIFIED

Heather

The public site below has directions to my office in bldg. 10. You and Barry should fill out the form attached and bring it with you for access or send it ahead to be ready. When you get here, I will meet you and escort you to get your visitor's pass. Just use my cell or work phone below to contact me when you arrive. If you want to send ahead, send it to usarmy.letterkenny.usamc.list.lett.drsk-access-apprv@mail.mil.

Caution-http://www.letterkenny.army.mil/directions.html

VR
Damian Bess
Director, Public Works
Letterkenny Army Depot
Chambersburg, PA 17202
Wk 717-267-9456
Wk Cell 717-331-9313

CLASSIFICATION: UNCLASSIFIED

CLASSIFICATION: UNCLASSIFIED

Brewster, Heather

From: Brubaker, Roy D (DCNR) <robrubaker@pa.gov>
Sent: Thursday, July 06, 2017 1:34 PM
To: Gribik, Jodie A
Cc: Brewster, Heather; Ewan, Keith D
Subject: FW: Transource Independence Energy Connection - Michaux State Forest
Attachments: 11x17_Michaux__IndexMap_West_060617.pdf; 11x17_AEP_Overview_West_060217.pdf; PA_PADCNR_Transource_20170131.pdf

Jodie,

I spoke with Heather by phone regarding this project and she may be calling you about setting up a meeting to discuss their route alternatives with the BOF. I believe Phil and Keith had been in contact with Dave and/or Bill regarding it. I will wait to hear from you on what next steps you will need our involvement in.

Thanks.
RB

From: NR, FD01
Sent: Thursday, July 06, 2017 10:22 AM
To: Brubaker, Roy D (DCNR) <robrubaker@pa.gov>
Subject: FW: Transource Independence Energy Connection - Michaux State Forest

Heather called this morning. I explained that our computers were down all day yesterday. She may call back later today as you were in a meeting when she called.
Thanks

Colleen DeLauter | Clerk Typist 1
PA Department of Conservation and Natural Resources
Bureau of Forestry, Michaux State Forest, District #1
10099 Lincoln Way East | Fayetteville, PA 17222
Phone: 717-352-2211 | Fax: 717-352-3007
E-mail: cdelauter@pa.gov

www.dcnr.state.pa.us

From: Brewster, Heather [mailto:Heather.Brewster@aecom.com]
Sent: Wednesday, July 05, 2017 3:51 PM
To: NR, FD01 <ra-fd01@pa.gov>
Subject: Transource Independence Energy Connection - Michaux State Forest

Mr. Brubaker,

I left a voicemail message regarding Transource LLC's Independence Energy Connection Project. This project entails a new 230kV transmission line project commencing north of Chambersburg, Franklin County PA and traveling south into Washington County, MD. We provided an introduction letter to PADCNR in January letting them know about the Project. We have currently identified several Study Segments and are considering them for their siting opportunities and constraints in order to identify 2-3 alternative

routes. Michaux State Forest sits along the eastern boundary of the Project Study Area. I have included the following figures for your information:

1. An Overview map of the West Project area that shows all the study segments we have identified to date
2. Corresponding index aerial map showing those areas of Michaux State Forest in proximity to our Study Segments shown in greater detail.
3. Index Map F4 shows the one Study Segment 302 that crosses Michaux State Forest south of the Greene and Guilford Twp line east of Bikle Road.

I would appreciate the opportunity to talk and if preferred have schedule a meeting to discuss the Project with Michaux State Forest. AECOM is aware of the Environmental Assessment process required when traversing any State Forests. If there is someone else I should be reaching out to regarding this matter please let me know. Transource will be attending a meeting with PADEP SC on June 19th to discuss the Project.

Thank you. ~Heather

Heather Brewster
Associate Vice President
AECOM Environment
☎ 610-832-8819 (direct line)
✉ heather.brewster@aecom.com
215.869.4137 (mobile)

AECOM
625 West Ridge Pike, Conshohocken, Pennsylvania 19428
T 1-610-832-3500 F 1-610-832-3501
www.aecom.com



Built to deliver a better world

Twitter I Facebook I Instagram I Google+

Brewster, Heather

From: Gribik, Jodie A <jgribik@pa.gov>
Sent: Wednesday, July 26, 2017 3:07 PM
To: Brewster, Heather
Subject: RE: Independence Energy Connection Project Update - Michaux State Forest

Hello Heather –

I am back in my office! I just returned from field work for the end of the day today. I want to check out the info at the link you provided. Also, Roy has mentioned that his district has spoken to my staff regarding this, so I'm going to try and catch up with them this afternoon and then I will get in touch with you asap. Thank you very much for your patience!

Jodie

Jodie Gribik, Section Chief
DCNR Bureau of Forestry
Operations Section
400 Market Street, P.O. Box 8552
Harrisburg, PA 17105
Phone: 717.787.2014
E-mail: jgribik@pa.gov
www.dcnr.state.pa.us/forestry

From: Brewster, Heather [mailto:Heather.Brewster@aecom.com]
Sent: Tuesday, July 25, 2017 2:39 PM
To: Brubaker, Roy D (DCNR) <robrubaker@pa.gov>; Gribik, Jodie A <jgribik@pa.gov>
Cc: Ewan, Keith D <kewan@pa.gov>; Laurie M Spears <lmspears@aep.com>
Subject: Independence Energy Connection Project Update - Michaux State Forest

Jodie and Roy,

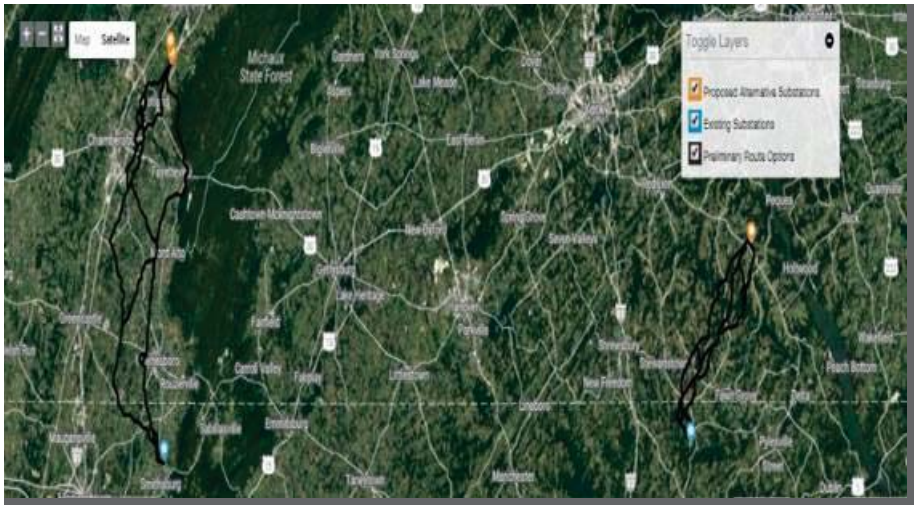
I want to follow-up regarding Transource's Independence Energy Connection Project. I will follow-up this email with a call to Jodie, as we have not been able to touch base and talk yet. Since talking with Roy, the Project has been further refined and 2 alternative routes are being considered. They can be reviewed at the project website, which is detailed below. At this time we are still considering an alternative that crosses the small area of Michaux State Forest, as discussed with Roy. Transource would like the opportunity to discuss this project further with the DCNR and setup a meeting. We will be having additional open houses the week of August 7th for the public to review and comment on these alternative routes. This information is all detailed below. If you click on the project aerial below or this link it will take you to the Project website and a viewer that shows the alternative routes. http://www.transourceenergyprojects.com/IndependenceEnergyConnection/.

Thank you ~Heather Brewster
610-832-8819

View this email in your browser

Thank you for your interest in the Independence Energy Connection (IEC), a new overhead electric transmission line project being built by Transource Energy.

Beginning today, Transource is taking input on refined preliminary alternative routes. This is the second phase of public review before the company determines a proposed route to file with state regulators.



The project website has been updated with the refined preliminary alternative routes.

In June, the company presented study segments to the public and received comments. Many of the study segments initially presented have been removed to arrive at the preliminary alternative routes now being announced. The company continues to take comments online, by phone, mail and in person at the open houses in August.

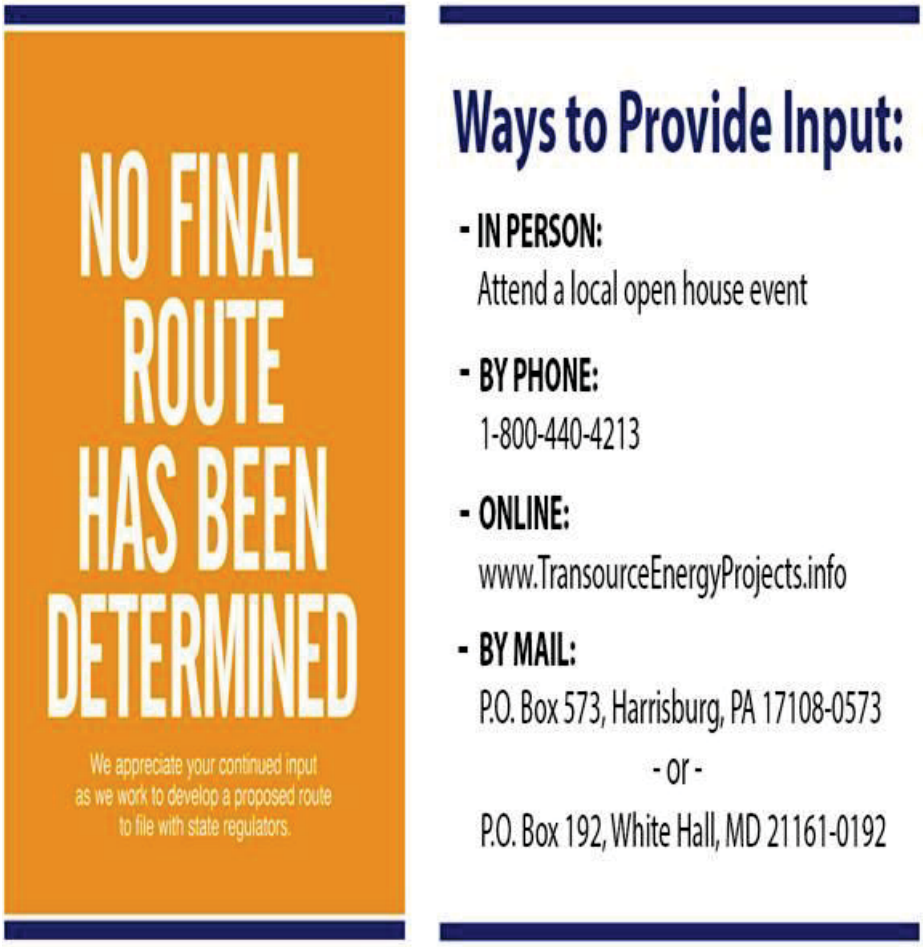
The open houses are scheduled for:

- **Monday, August 7 from 6-9 p.m**
  Smithsburg Middle School (Gym)
  Smithsburg, Md.

- **Tuesday, August 8 from 6-9 p.m.**
  Kauffman Ruritan Club and Community Center
  Chambersburg, Pa.

- **Wednesday, August 9 from 6-9 p.m.**
  Norrisville Elementary School (Gym)
  White Hall, Md.

- **Thursday, August 10 from 6-9 p.m.**
  Kennard-Dale High School (Cafeteria)
  Fawn Grove, Pa.

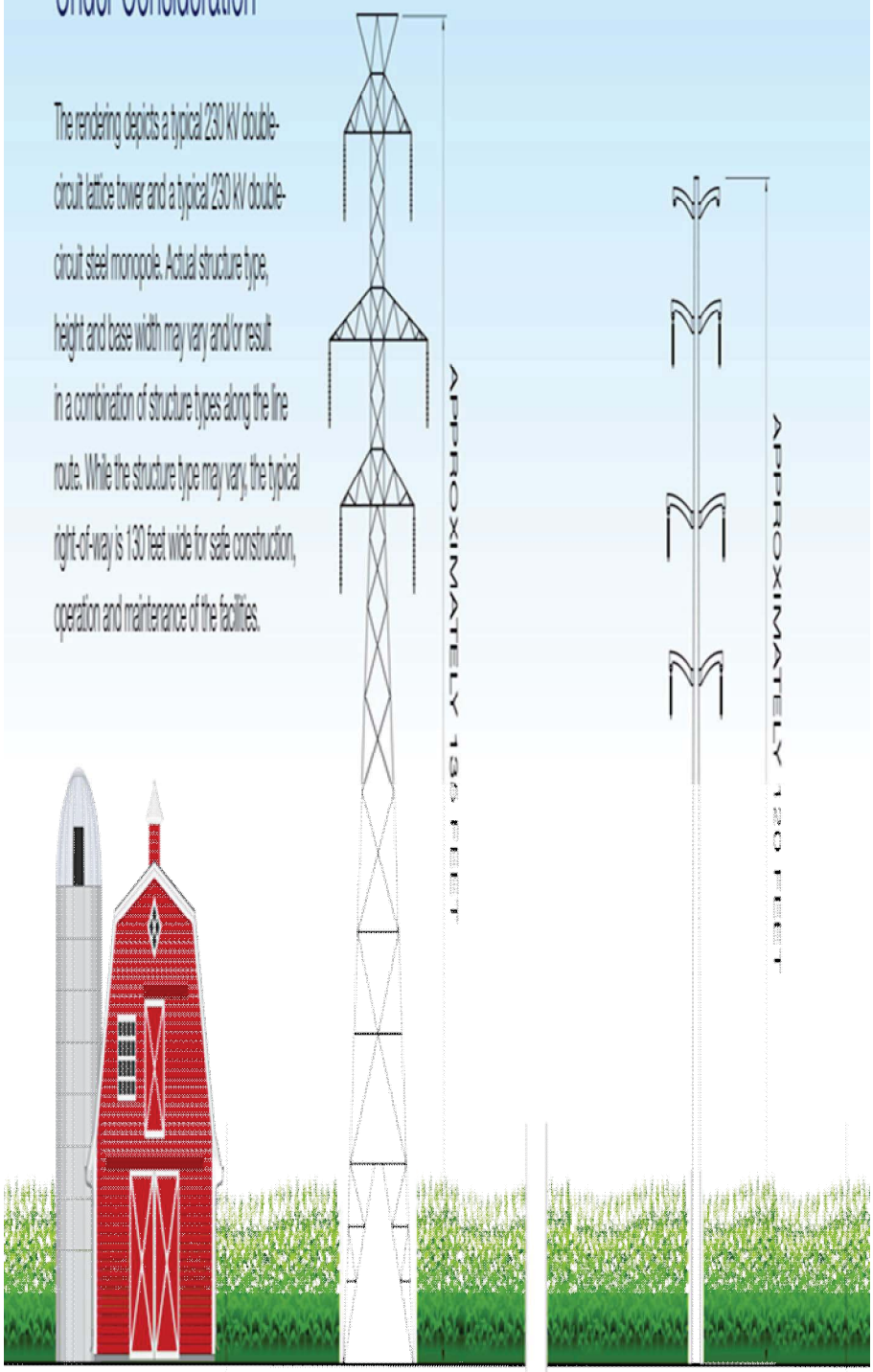


As with the first open houses, attendees can talk with Transource team members, learn about the project, review maps and provide input. There is no formal presentation, so attendees are welcome to come at any point throughout the evening.

The comments we receive play an active role in our decision-making process to determine a proposed route. Additionally, based on feedback, Transource is now considering the use of a steel monopole in addition to lattice structures.

Proposed Structures Under Consideration

The rendering depicts a typical 230 kV double-circuit lattice tower and a typical 230 kV double-circuit steel monopole. Actual structure type, height and base width may vary and/or result in a combination of structure types along the line route. While the structure type may vary, the typical right-of-way is 130 feet wide for safe construction, operation and maintenance of the facilities.



Brewster, Heather

From: Plank, Christopher <cplank@pa.gov>
Sent: Thursday, September 21, 2017 7:04 AM
To: Mong, David E (DCNR); Brewster, Heather; lmspears@aep.com; Baker, Barry
Cc: Bowen, Rebecca; Brubaker, Roy D (DCNR)
Subject: RE: PA DCNR - TRANSOURCE - Independence Energy Connection Transmission Line - Project Overview Meeting (West)
Attachments: j-35-2016mo - 10314240919600966.pdf; SR Line NEBA Report 27 July 2012 _FINAL_PUBLIC Complete.pdf

Hello all,

Attached is the very recent (June 2017) PA Supreme Court Opinion regarding DCNR and the Commonwealth's obligation to act as "trustees" for the Commonwealth's natural resources. This opinion is in regards to Article 1 Section 27 of the Pennsylvania Constitution, otherwise known as the "Environmental Rights Amendment". The opinion underscores the Department's mandatory obligation to uphold this amendment, as well as the mandatory obligation to function as trustee for the environmental values of the State Forests.

Also attached is the Human Use and Ecological Impacts study that was performed for the Susquehanna-Roseland powerline crossing of the Delaware Water Gap National Recreation Area. The study was the basis for the $66 mitigation fund established as compensation for crossing the public lands of the Delaware Water Gap. (http://www.poconorecord.com/article/20140513/news90/405130318)

Both of these attachments were mentioned in our meeting yesterday.

Thank you for coming in to meet with us. We appreciate the information you were able to provide us on the project, and we hope that the information that we provided is helpful to you. We realize how terribly challenging the task of selecting a corridor can be. As Dave mentions below, please feel free to contact us at any time if we can be of any assistance.

Thanks again.
Chris

Christopher J. Plank | Assistant State Forester
Director of Forestry Services
Department of Conservation and Natural Resources
Bureau of Forestry
400 Market Street | Harrisburg, PA 17105
Phone: 717.787.6055 | Fax: 717.783.5009
E-mail: CPlank@pa.gov
http://www.dcnr.state.pa.us/forestry/index.aspx

From: Mong, David E (DCNR)
Sent: Wednesday, September 20, 2017 4:27 PM
To: Brewster, Heather <Heather.Brewster@aecom.com>; lmspears@aep.com; barry.baker@aecom.com

Cc: Bowen, Rebecca <rebbowen@pa.gov>; Plank, Christopher <cplank@pa.gov>; Brubaker, Roy D (DCNR) <robrubaker@pa.gov>
Subject: PA DCNR - TRANSOURCE - Independence Energy Connection Transmission Line - Project Overview Meeting (West)

Good Afternoon,

Attached is today's sign-in sheet for your records.

It was a pleasure in meeting you all in person today and good to converse with you once again Barry. We found it informative and I sensed that both parties gained in helping each other today with relative information and knowledge. Thank you for making the effort to reach out and meet with us in person; it seemed altogether fitting.

Please feel free to reach out to us at any time in the future and if we can be of help in any way.

David E. Mong, Forest Program Specialist - Right of Way Administration
Department of Conservation & Natural Resources
Bureau of Forestry/Central Office – Operations Section
400 Market Street, 6th Floor
Harrisburg, PA 17105
Office Phone: 717-783-7947
www.dcnr.state.pa.us

The information transmitted is intended only for the person or entity to whom it is addressed and may contain confidential and/or privileged material. Any use of this information other than by the intended recipient is prohibited. If you receive this message in error, please send a reply e-mail to the sender and delete the material from any and all computers.

Brewster, Heather

From: Jones, Hathaway - NRCS, Harrisburg, PA <Hathaway.Jones@pa.usda.gov>
Sent: Thursday, August 31, 2017 11:43 AM
To: Brewster, Heather
Subject: Easements impacted by transource pipeline map
Attachments: transource.pdf

Heather,
Attached is the map showing the proposed pipeline and USDA/NRCS easements impacted. We are also showing easements in the proximity/close to the proposed pipeline in case the route changes in future.

Sincerely,

Hathaway Jones
Management Analyst
USDA/NRCS
359 East Park Drive, Suite 2
Harrisburg, PA 17111
717-237-2210
USDA is an equal opportunity provider, employer, and lender

From: Dunn, Marcie - NRCS, Harrisburg, PA
Sent: Thursday, August 31, 2017 11:30 AM
To: Jones, Hathaway - NRCS, Harrisburg, PA <Hathaway.Jones@pa.usda.gov>
Subject: Easements impacted by transource pipeline map

Marcie Dunn
GIS Specialist
359 East Park Drive, Suite 2
Harrisburg, PA 17111-2747
USDA - NRCS
(717)237-2246

USDA is an equal opportunity provider, employer, and lender.

This electronic message contains information generated by the USDA solely for the intended recipients. Any unauthorized interception of this message or the use or disclosure of the information it contains may violate the law and subject the violator to civil or criminal penalties. If you believe you have received this message in error, please notify the sender and delete the email immediately.

MARYLAND

AGENCY CONSULTATION AND RESPONSES

Transource, LLC
8500 Smith Mill Road
New Albany, OH 43054
Tel: 614.933.2600 main

January 31, 2017

Shawn Garvin, Regional Administrator
U.S. Environmental Protection Agency
Region 3
1650 Arch Street, Mail Code: 3RA00
Philadelphia, Pennsylvania 19103-2029

Subject: Transource, LLC
Independence Energy Connection Transmission Line Project

Dear Mr. Garvin,

Transource Energy, LLC (Transource) is proposing to build two new transmission lines and two new substations in Pennsylvania and Maryland as part of the Independence Energy Connection Project (Project). Transource was awarded the Project by PJM in August of 2016 to address transmission congestion across the Pennsylvania and Maryland border. Transource will be seeking approval to construct the Project from the Pennsylvania Public Utilities Commission and the Maryland Public Service Commission. The Project is in the initial data gathering phase and Transource is seeking input from agencies to help assist in the siting of the new transmission lines.

The Project components include two new 230 kV double circuit overhead transmission lines and two new 500/230 kV substations. The two transmission lines are separated by approximately 50 miles and are designated as either the East Route or West Route. The West route is approximately 23 miles and begins at the proposed Rice Substation in Franklin County, Pennsylvania and extends to the existing Ringgold Substation in Washington County, Maryland. The East route is approximately 13 miles starting at the proposed Furnace Run Substation in York County, Pennsylvania and extends to the existing Conastone Substation in Harford County, Maryland.

Transource has retained AECOM to assist with the transmission line siting and state applications necessary for approval of the proposed Project. At this time, AECOM is requesting consultation for the Project activities occurring Pennsylvania and Maryland. The Project is in the preliminary siting stages and therefore focal areas have been identified for the purposes of this consultation. USGS and road maps depicting the approximate focal areas are included for reference. The table below identifies those counties, and within Pennsylvania those municipalities, that fall within the Project focal areas.

Independence Energy Connection West and East Projects Counties and Municipalities		
Pennsylvania		
West Route – Franklin County		**East Route – York County**
Letterkenny Township	Quincy Township	Chanceford Township
Southampton Township	Mont Alto Borough	East Hopewell Township
Greene Township	Antrim Township	Hopewell Township
Chambersburg Borough	Greencastle Borough	Fawn Township
Hamilton Township	Washington Township	Fawn Grove Borough
Guilford Township	Waynesboro Borough	Peach Bottom Township
Maryland		
West Route – Washington County		**East Route – Harford County**

Transource and AECOM are looking to obtain information from your agency on potential issues and/or constraints within the identified focal areas that would need to be considered during the siting of the transmission lines. Any information that you could provide at this time, would be greatly appreciated. Transource will continue to provide updates to the EPA as the Project progresses and more specific routes are identified. We appreciate your assistance as we work through this iterative process and will be looking to schedule a meeting with your agency to further discuss this Project in the coming months.

Please contact me at (610) 832-8819 if you have any questions or require additional information and please provide any response to my attention at the AECOM address provided below.

Yours sincerely,



Heather Brewster
Project Manager
heather.brewster@aecom.com

AECOM
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures: USGS Based Focal Area Map
Road Based Focal Area Map

cc: Laurie Spears – Transource

Transource, LLC
8500 Smith Mill Road
New Albany, OH 43054
Tel: 614.933.2600 main

January 31, 2017

Joe DaVia, Chief, Maryland Section Northern
U.S. Army Corps of Engineers
Baltimore District
Regulatory Branch
10 South Howard Street
Baltimore, Maryland 21201-1715

Subject: Transource, LLC
Independence Energy Connection Transmission Line Project

Dear Mr. DaVia,

Transource Energy, LLC (Transource) is proposing to build two new transmission lines and two new substations in Pennsylvania and Maryland as part of the Independence Energy Connection Project (Project). Transource was awarded the Project by PJM in August of 2016 to address transmission congestion across the Pennsylvania and Maryland border. Transource will be seeking approval to construct the Project from the Pennsylvania Public Utilities Commission and the Maryland Public Service Commission. The Project is in the initial data gathering phase and Transource is seeking input from agencies to help assist in the siting of the new transmission lines.

The Project components include two new 230 kV double circuit overhead transmission lines and two new 500/230 kV substations. The two transmission lines are separated by approximately 50 miles and are designated as either the East Route or West Route. The West route is approximately 23 miles and begins at the proposed Rice Substation in Franklin County, Pennsylvania and extends to the existing Ringgold Substation in Washington County, Maryland. The East route is approximately 13 miles starting at the proposed Furnace Run Substation in York County, Pennsylvania and extends to the existing Conastone Substation in Harford County, Maryland.

Transource has retained AECOM to assist with the transmission line siting and state applications necessary for approval of the proposed Project. At this time, AECOM is requesting consultation specific to the Project activities occurring within Washington and Harford Counties, Maryland. The Project is in the preliminary siting stages and therefore focal areas have been identified for the purposes of this consultation. USGS and road maps depicting the approximate focal areas are included for reference. The table below identifies those counties that fall within the Project focal areas.

Independence Energy Connection West and East Projects Counties	
West Route – Washington County	**East Route – Harford County**

Transource and AECOM are looking to obtain information from your agency on potential issues and/or constraints within the identified focal areas that would need to be considered during the siting of the transmission lines. Any information that you could provide at this time, would be greatly appreciated. Once a formal route is selected, Transource will submit a formal pre-application meeting request. Transource will continue to provide updates to the United States Army Corps of Engineers (USACE) as the Project progresses and more specific routes are identified. We appreciate your assistance as we work through this iterative process and will be looking to schedule a meeting with your agency to further discuss this Project in the coming months.

Please contact me at (610) 832-8819 if you have any questions or require additional information and please provide any response to my attention at the AECOM address provided below.

Yours sincerely,



Heather Brewster
Project Manager
heather.brewster@aecom.com

AECOM
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures: USGS Based Focal Area Map
Road Based Focal Area Map

cc: Laurie Spears – Transource

Brewster, Heather

From: Bole, Donald R CIV USARMY CELRP (US) <Donald.R.Bole@usace.army.mil>
Sent: Wednesday, May 03, 2017 6:12 PM
To: Brewster, Heather
Subject: Independence Energy Connection Transmission Line Project

Ms. Brewster,

We have received your request for potential issues and/or constraints for the siting of transmission lines proposed for the Independence Energy Connection Transmission Line Project, located in Washington and Howard Counties, Maryland. We request that you strongly consider keeping wetland and stream impacts within the MDSPGP-5 thresholds. Generally, this is 2,000 lf of stream impact and 5,000 square feet of wetland impact; however, it depends on the activity type that your project falls under. If you exceed these thresholds, you will have to apply for an individual permit. To reduce stream and wetland impacts, you should consider bridges, steep side slopes, retaining walls and stream relocations opposed to filling/culverting. Also, consider using temporary construction road access bridges to span streams and wetlands. For any permanent roads, use of bridges to span streams and wetlands is preferred.

In addition, when considering alignments, please be aware of any ESA issues or historic/archeological sites. Based on your proposed footprint, part of your project may be within bog turtle habitat. As you are aware, we will need clearance for ESA and Section 106 of NHPA. Significant resources within the footprint of the project may significantly delay issuing a Department of the Army permit.

Also, it appears that part of your proposed project is within Pennsylvania. If you have impacts to jurisdictional streams and/or wetlands within Pennsylvania, you will need to coordinate with the Pennsylvania Section (State College). Wade Chandler is the Section Chief in Pennsylvania and his phone number is 814-235-0573.

If you have any additional questions, please don't hesitate to contact me. We strongly recommend a pre-application meeting with our office. If you want to have a pre-application meeting with our office before you finalize a route, we can be available.

Thanks,

Don

Donald R. Bole
U.S. Army Corps of Engineers
10 S. Howard Street
Baltimore, MD 21201
(410) 962-6079

Transource, LLC
8500 Smith Mill Road
New Albany, OH 43054
Tel: 614.933.2600 main

January 31, 2017

Genevieve LaRouche, Field Supervisor
U.S. Fish & Wildlife Service
Chesapeake Bay Field Office
177 Admiral Cochrane Drive
Annapolis, Maryland 21401

Subject: Transource, LLC
Independence Energy Connection Transmission Line Project

Dear Ms. LaRouche,

Transource Energy, LLC (Transource) is proposing to build two new transmission lines and two new substations in Pennsylvania and Maryland as part of the Independence Energy Connection Project (Project). Transource was awarded the Project by PJM in August of 2016 to address transmission congestion across the Pennsylvania and Maryland border. Transource will be seeking approval to construct the Project from the Pennsylvania Public Utilities Commission and the Maryland Public Service Commission. The Project is in the initial data gathering phase and Transource is seeking input from agencies to help assist in the siting of the new transmission lines.

The Project components include two new 230 kV double circuit overhead transmission lines and two new 500/230 kV substations. The two transmission lines are separated by approximately 50 miles and are designated as either the East Route or West Route. The West route is approximately 23 miles and begins at the proposed Rice Substation in Franklin County, Pennsylvania and extends to the existing Ringgold Substation in Washington County, Maryland. The East route is approximately 13 miles starting at the proposed Furnace Run Substation in York County, Pennsylvania and extends to the existing Conastone Substation in Harford County, Maryland.

Transource has retained AECOM to assist with the transmission line siting and state applications necessary for approval of the proposed Project. At this time, AECOM is requesting consultation specific to the Project activities occurring within Franklin and York Counties, Pennsylvania. The Project is in the preliminary siting stages and therefore focal areas have been identified for the purposes of this consultation. USGS and road maps depicting the approximate focal areas are included for reference. The table below identifies those counties that fall within the Project focal areas.

Independence Energy Connection West and East Projects Counties	
West Route – Washington County	**East Route – Harford County**

Transource and AECOM are looking to obtain information from your agency on potential issues and/or constraints within the identified focal areas that would need to be considered during the siting of the transmission lines. Any information that you could provide at this time, would be greatly appreciated. Once a formal route is selected, Transource will submit a project specific consultation for review. Transource will continue to provide updates to the United States Fish and Wildlife Service (USFWS) as the Project progresses and more specific routes are identified. We appreciate your assistance as we work through this iterative process and will be looking to schedule a meeting with your agency to further discuss this Project in the coming months.

Please contact me at (610) 832-8819 if you have any questions or require additional information and please provide any response to my attention at the AECOM address provided below.

Yours sincerely,



Heather Brewster
Project Manager
heather.brewster@aecom.com

AECOM
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures: USGS Based Focal Area Map
Road Based Focal Area Map

cc: Laurie Spears – Transource

Transource, LLC
8500 Smith Mill Road
New Albany, OH 43054
Tel: 614.933.2600 main

January 31, 2017

Denise Keehner, Program Manager
Maryland Department of Natural Resources
Wildlife Heritage and Environmental Review Unit
1800 Washington Boulevard
Baltimore, Maryland 21230

Subject: Transource, LLC
Independence Energy Connection Transmission Line Project

Dear Ms. Keehner,

Transource Energy, LLC (Transource) is proposing to build two new transmission lines and two new substations in Pennsylvania and Maryland as part of the Independence Energy Connection Project (Project). Transource was awarded the Project by PJM in August of 2016 to address transmission congestion across the Pennsylvania and Maryland border. Transource will be seeking approval to construct the Project from the Pennsylvania Public Utilities Commission and the Maryland Public Service Commission. The Project is in the initial data gathering phase and Transource is seeking input from agencies to help assist in the siting of the new transmission lines.

The Project components include two new 230 kV double circuit overhead transmission lines and two new 500/230 kV substations. The two transmission lines are separated by approximately 50 miles and are designated as either the East Route or West Route. The West route is approximately 23 miles and begins at the proposed Rice Substation in Franklin County, Pennsylvania and extends to the existing Ringgold Substation in Washington County, Maryland. The East route is approximately 13 miles starting at the proposed Furnace Run Substation in York County, Pennsylvania and extends to the existing Conastone Substation in Harford County, Maryland.

Transource has retained AECOM to assist with the transmission line siting and state applications necessary for approval of the proposed Project. At this time, AECOM is requesting consultation specific to the Project activities occurring within Washington and Harford Counties, Maryland. The Project is in the preliminary siting stages and therefore focal areas have been identified for the purposes of this consultation. USGS and road maps depicting the approximate focal areas are included for reference. The table below identifies those counties that fall within the Project focal areas.

Independence Energy Connection West and East Projects	
West Route – Washington County	**East Route – Harford County**

Transource and AECOM are looking to obtain information from your agency on potential issues and/or constraints within the identified focal areas that would need to be considered during the siting of the transmission lines. Any information that you could provide at this time, would be greatly appreciated. Once a formal route is selected, Transource will submit a formal Environmental Review Request. Transource will continue to provide updates to the Maryland Department of Natural Resources (MDNR) as the Project progresses and more specific routes are identified. We appreciate your assistance as we work through this iterative process and will be looking to schedule a meeting with your agency to further discuss this Project in the coming months.

Please contact me at (610) 832-8819 if you have any questions or require additional information and please provide any response to my attention at the AECOM address provided below.

Yours sincerely,



Heather Brewster
Project Manager
heather.brewster@aecom.com

AECOM
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures: USGS Based Focal Area Map
Road Based Focal Area Map

cc: Laurie Spears – Transource

Transource, LLC
8500 Smith Mill Road
New Albany, OH 43054
Tel: 614.933.2600 main

January 31, 2017

Louise Lawrence, Program Manager
Maryland Department of Agriculture
Office of Resource Conservation
50 Harry S. Truman Parkway
Annapolis, Maryland 21401

Subject: Transource, LLC
Independence Energy Connection Transmission Line Project

Dear Ms. Lawrence,

Transource Energy, LLC (Transource) is proposing to build two new transmission lines and two new substations in Pennsylvania and Maryland as part of the Independence Energy Connection Project (Project). Transource was awarded the Project by PJM in August of 2016 to address transmission congestion across the Pennsylvania and Maryland border. Transource will be seeking approval to construct the Project from the Pennsylvania Public Utilities Commission and the Maryland Public Service Commission. The Project is in the initial data gathering phase and Transource is seeking input from agencies to help assist in the siting of the new transmission lines.

The Project components include two new 230 kV double circuit overhead transmission lines and two new 500/230 kV substations. The two transmission lines are separated by approximately 50 miles and are designated as either the East Route or West Route. The West route is approximately 23 miles and begins at the proposed Rice Substation in Franklin County, Pennsylvania and extends to the existing Ringgold Substation in Washington County, Maryland. The East route is approximately 13 miles starting at the proposed Furnace Run Substation in York County, Pennsylvania and extends to the existing Conastone Substation in Harford County, Maryland.

Transource has retained AECOM to assist with the transmission line siting and state applications necessary for approval of the proposed Project. At this time, AECOM is requesting consultation specific to the Project activities occurring within Washington and Harford Counties, Maryland. The Project is in the preliminary siting stages and therefore focal areas have been identified for the purposes of this consultation. USGS and road maps depicting the approximate focal areas are included for reference. The table below identifies those counties that fall within the Project focal areas.

Independence Energy Connection West and East Projects Counties	
West Route – Washington County	**East Route – Harford County**

Transource and AECOM are looking to obtain information from your agency on potential issues and/or constraints within the identified focal areas that would need to be considered during the siting of the transmission lines. Any information that you could provide at this time, would be greatly appreciated. Transource will continue to provide updates to the Maryland Department of Agriculture (MDA) as the Project progresses and more specific routes are identified. We appreciate your assistance as we work through this iterative process and will be looking to schedule a meeting with your agency to further discuss this Project in the coming months.

Please contact me at (610) 832-8819 if you have any questions or require additional information and please provide any response to my attention at the AECOM address provided below.

Yours sincerely,



Heather Brewster
Project Manager
heather.brewster@aecom.com

AECOM
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures: USGS Based Focal Area Map
Road Based Focal Area Map

cc: Laurie Spears – Transource

Transource, LLC
8500 Smith Mill Road
New Albany, OH 43054
Tel: 614.933.2600 main

January 31, 2017

Lynn Buhl, Director
Maryland Department of the Environment
Water Management Administration
Director Office
1800 Washington Boulevard
Baltimore, Maryland 21230

Subject: Transource, LLC
Independence Energy Connection Transmission Line Project

Dear Ms. Buhl,

Transource Energy, LLC (Transource) is proposing to build two new transmission lines and two new substations in Pennsylvania and Maryland as part of the Independence Energy Connection Project (Project). Transource was awarded the Project by PJM in August of 2016 to address transmission congestion across the Pennsylvania and Maryland border. Transource will be seeking approval to construct the Project from the Pennsylvania Public Utilities Commission and the Maryland Public Service Commission. The Project is in the initial data gathering phase and Transource is seeking input from agencies to help assist in the siting of the new transmission lines.

The Project components include two new 230 kV double circuit overhead transmission lines and two new 500/230 kV substations. The two transmission lines are separated by approximately 50 miles and are designated as either the East Route or West Route. The West route is approximately 23 miles and begins at the proposed Rice Substation in Franklin County, Pennsylvania and extends to the existing Ringgold Substation in Washington County, Maryland. The East route is approximately 13 miles starting at the proposed Furnace Run Substation in York County, Pennsylvania and extends to the existing Conastone Substation in Harford County, Maryland.

Transource has retained AECOM to assist with the transmission line siting and state applications necessary for approval of the proposed Project. At this time, AECOM is requesting consultation specific to the Project activities occurring within Washington and Harford Counties, Maryland. The Project is in the preliminary siting stages and therefore focal areas have been identified for the purposes of this consultation. USGS and road maps depicting the approximate focal areas are included for reference. The table below identifies those counties that fall within the Project focal areas.

Independence Energy Connection West and East Projects Counties	
West Route – Washington County	**East Route – Harford County**

Transource and AECOM are looking to obtain information from your agency on potential issues and/or constraints within the identified focal areas that would need to be considered during the siting of the transmission lines. Any information that you could provide at this time, would be greatly appreciated. Once a formal route is selected, Transource will submit a pre-application meeting request. Transource will continue to provide updates to the Maryland Department of Environment (MDE) as the Project progresses and more specific routes are identified. We appreciate your assistance as we work through this iterative process and will be looking to schedule a meeting with your agency to further discuss this Project in the coming months.

Please contact me at (610) 832-8819 if you have any questions or require additional information and please provide any response to my attention at the AECOM address provided below.

Yours sincerely,



Heather Brewster
Project Manager
heather.brewster@aecom.com

AECOM
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures: USGS Based Focal Area Map
Road Based Focal Area Map

cc: Laurie Spears – Transource

Transource, LLC
8500 Smith Mill Road
New Albany, OH 43054
Tel: 614.933.2600 main

January 31, 2017

William Leahy, Executive Director
Maryland Environmental Trust
100 Community Place, 3rd Floor
Crownsville, Maryland 21030-2023

Subject: Transource, LLC
Independence Energy Connection Transmission Line Project

Dear Mr. Leahy,

Transource Energy, LLC (Transource) is proposing to build two new transmission lines and two new substations in Pennsylvania and Maryland as part of the Independence Energy Connection Project (Project). Transource was awarded the Project by PJM in August of 2016 to address transmission congestion across the Pennsylvania and Maryland border. Transource will be seeking approval to construct the Project from the Pennsylvania Public Utilities Commission and the Maryland Public Service Commission. The Project is in the initial data gathering phase and Transource is seeking input from agencies to help assist in the siting of the new transmission lines.

The Project components include two new 230 kV double circuit overhead transmission lines and two new 500/230 kV substations. The two transmission lines are separated by approximately 50 miles and are designated as either the East Route or West Route. The West route is approximately 23 miles and begins at the proposed Rice Substation in Franklin County, Pennsylvania and extends to the existing Ringgold Substation in Washington County, Maryland. The East route is approximately 13 miles starting at the proposed Furnace Run Substation in York County, Pennsylvania and extends to the existing Conastone Substation in Harford County, Maryland.

Transource has retained AECOM to assist with the transmission line siting and state applications necessary for approval of the proposed Project. At this time, AECOM is requesting consultation specific to the Project activities occurring within Washington and Harford Counties, Maryland. The Project is in the preliminary siting stages and therefore focal areas have been identified for the purposes of this consultation. USGS and road maps depicting the approximate focal areas are included for reference. The table below identifies those counties that fall within the Project focal areas.

Independence Energy Connection West and East Projects Counties	
West Route – Washington County	**East Route – Harford County**

Transource and AECOM are looking to obtain information from your agency on potential issues and/or constraints within the identified focal areas that would need to be considered during the siting of the transmission lines. Any information that you could provide at this time, would be greatly appreciated. Transource will continue to provide updates to the Maryland Environmental Trust (MET) as the Project progresses and more specific routes are identified. We appreciate your assistance as we work through this iterative process and will be looking to schedule a meeting with your agency to further discuss this Project in the coming months.

Please contact me at (610) 832-8819 if you have any questions or require additional information and please provide any response to my attention at the AECOM address provided below.

Yours sincerely,



Heather Brewster
Project Manager
heather.brewster@aecom.com

AECOM
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures: USGS Based Focal Area Map
Road Based Focal Area Map

cc: Laurie Spears – Transource

Transource, LLC
8500 Smith Mill Road
New Albany, OH 43054
Tel: 614.933.2600 main

January 31, 2017

Natalie Loukianoff, Preservation Officer
Maryland Historical Trust
100 Community Place, 3rd Floor
Crownsville, Maryland 21030-2023

Subject: Transource, LLC
Independence Energy Connection Transmission Line Project

Dear Ms. Loukianoff,

Transource Energy, LLC (Transource) is proposing to build two new transmission lines and two new substations in Pennsylvania and Maryland as part of the Independence Energy Connection Project (Project). Transource was awarded the Project by PJM in August of 2016 to address transmission congestion across the Pennsylvania and Maryland border. Transource will be seeking approval to construct the Project from the Pennsylvania Public Utilities Commission and the Maryland Public Service Commission. The Project is in the initial data gathering phase and Transource is seeking input from agencies to help assist in the siting of the new transmission lines.

The Project components include two new 230 kV double circuit overhead transmission lines and two new 500/230 kV substations. The two transmission lines are separated by approximately 50 miles and are designated as either the East Route or West Route. The West route is approximately 23 miles and begins at the proposed Rice Substation in Franklin County, Pennsylvania and extends to the existing Ringgold Substation in Washington County, Maryland. The East route is approximately 13 miles starting at the proposed Furnace Run Substation in York County, Pennsylvania and extends to the existing Conastone Substation in Harford County, Maryland.

Transource has retained AECOM to assist with the transmission line siting and state applications necessary for approval of the proposed Project. At this time, AECOM is requesting consultation specific to the Project activities occurring within Washington and Harford Counties, Maryland. The Project is in the preliminary siting stages and therefore focal areas have been identified for the purposes of this consultation. USGS and road maps depicting the approximate focal areas are included for reference. The table below identifies those counties that fall within the Project focal areas.

Independence Energy Connection West and East Projects Counties	
West Route – Washington County	**East Route – Harford County**

Transource and AECOM are looking to obtain information from your agency on potential issues and/or constraints within the identified focal areas that would need to be considered during the siting of the transmission lines. Any information that you could provide at this time, would be greatly appreciated. Once a formal route is selected, Transource will submit a formal project review request. Transource will continue to provide updates to the Maryland Historical Trust (MHT) as the Project progresses and more specific routes are identified. We appreciate your assistance as we work through this iterative process and will be looking to schedule a meeting with your agency to further discuss this Project in the coming months.

Please contact me at (610) 832-8819 if you have any questions or require additional information and please provide any response to my attention at the AECOM address provided below.

Yours sincerely,



Heather Brewster
Project Manager
heather.brewster@aecom.com

AECOM
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures: USGS Based Focal Area Map
Road Based Focal Area Map

cc: Laurie Spears – Transource

MARYLAND DEPARTMENT OF
PLANNING
MARYLAND HISTORICAL TRUST

Larry Hogan, Governor
Boyd Rutherford, Lt. Governor

Wendi W. Peters, Secretary
Ewing McDowell, Deputy Secretary

July 19, 2017

Ms. Heather Brewster
AECOM
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Re: MHT Pre-Application Review of Proposed Transource Transmission Lines and Substations
Independence Energy Connection Project – Harford and Washington Counties, Maryland

Dear Ms. Brewster:

Thank you for providing the Maryland Historical Trust (MHT) with preliminary information regarding the above-referenced undertaking. We understand that Transource Energy, LLC is proposing to build two new transmission lines (East Route and West Route) and two new substations in Pennsylvania and Maryland as part of the Independence Energy Connection Project. AECOM is working with Transource to gather preliminary siting information and to evaluate various transmission line route alternatives. As the proposed transmission lines will require a variety of federal and state permits and licenses from agencies such as the U.S. Army Corps of Engineers, the Maryland Department of the Environment, and the Maryland Department of Natural Resources, MHT staff are reviewing your submittal in accordance with Section 106 of the National Historic Preservation Act and the Maryland Historical Trust Act, §§ 5A-325 and 5A-326 of the State Finance and Procurement Article and would like to offer the following preliminary comments and recommendations.

Following our review of the two proposed focal areas identified in the initial project submittal, it is clear that the proposed transmission lines will pass through a number of locales containing inventoried historic properties, historic districts, and archeologically sensitive areas. MHT files indicate that literally dozens of archeological sites (both prehistoric and historic) and over 200 Maryland Inventory of Historic Properties sites are, in fact, located within the two focal areas that are outlined in your submittal. The East Focal Area contains one known archeological site and 66 properties that are included in the Maryland Inventory, while the West Focal Area contains 69 known archeological sites and 136 Maryland Inventory properties – including six that are listed on the National Register of Historic Properties.

Due to the presence of these historic properties, archeological and/or architectural studies may be necessary, depending upon the actual location of proposed route alignments and all potential impact areas. However, given the notably extensive nature of the current study areas, we are unable to provide specific recommendations at this time. We are therefore recommending that Transource and AECOM continue to coordinate with our office and send a cultural resources consultant to the MHT Library to conduct the necessary research and obtain all available information on the historic properties located within the proposed project's Area of Potential Effect. Our library is open to the public on Tuesdays, Wednesdays, and Thursdays by

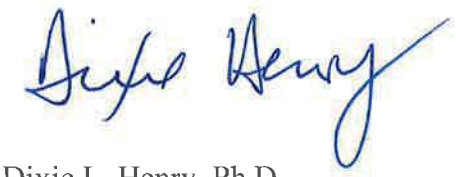
appointment only. To make an appointment, please contact Mary Louise de Sarran at 410-697-9546. Once this research has been completed, please submit the following information to our office for review:

- A detailed description of the proposed undertaking and its potential effects
- Transmission route maps for all alternatives being considered
- A clear delineation of the project's Area of Potential Effect (APE)
- A summary of the existing information on known and potential historic properties that may be affected by the undertaking
- Photographs (print or digital) of all structures that may be affected by the project

Upon our receipt of this information, we will continue our review of the undertaking and determine what architectural, historical, and archeological investigations will be necessary to identify and evaluate historic properties located within the project's APE. We would also recommend that AECOM and Transource contact the representatives from the Heart of the Civil War Heritage Area and involve them in this consultation, as a portion of this Heritage Area may be located within the West Focal Area. Elizabeth Scott Shatto is the Executive Director of the Heart of the Civil War Heritage Area, and she can be contacted at 301-600-4042.

We appreciate your effort to coordinate with our office early in the planning process, and we look forward to working with you to complete the historic preservation requirements for this undertaking. If you have any questions or require additional information, please do not hesitate to contact me at 410-697-9553 or dixie.henry@maryland.gov.

Sincerely,



Dixie L. Henry, Ph.D.
Preservation Officer
Maryland Historical Trust

DLH/201700452/201700453

Cc: Joe DaVia (COE)
Steve Elinsky (COE)
Maria Teresi (COE)
Abbie Hopkins (COE)
Jeff Thompson (MDE)
Susan Gray (DNR)



Legend

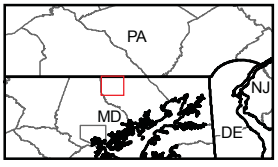
- Substation
- Existing Transmission Lines
- Project Focal Area
- County Boundary
- State Boundary

N

0 6,000 12,000 Feet

Coordinate System:
NAD 1983 UTM Zone 18N
Projection: Transverse Mercator
Linear Unit: Meter

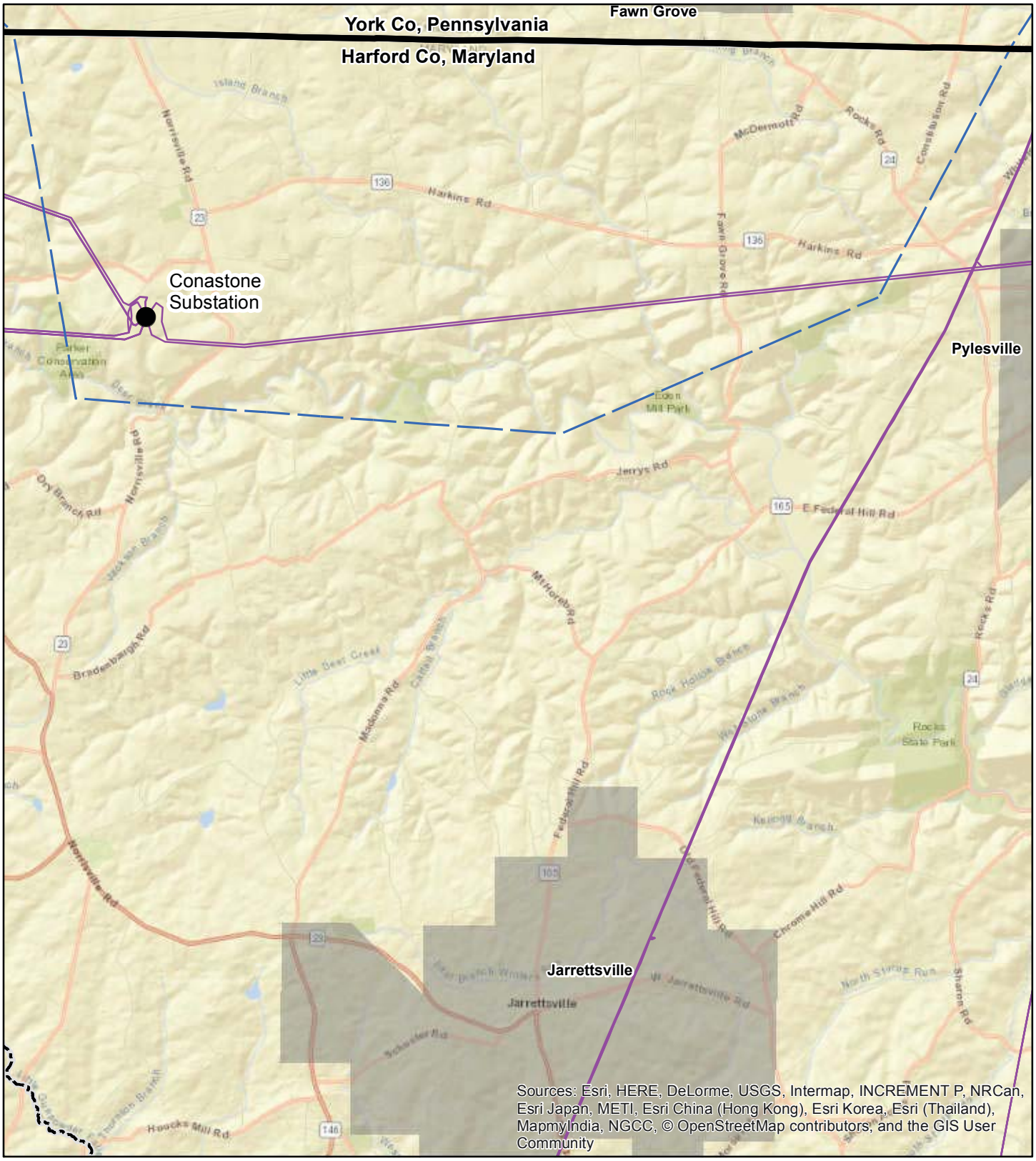
Data Sources:
Platts Power Map Transmission Line (2011)
USA Topo Maps (ESRI)



TRANSOURCE

Job: 60528995	Independence Energy Connection - East Transource, LLC Focal Area - MD
Prepared by: NB/BSF	
Checked by: HB	
Date: 1/27/2017	Confidential - Draft Work Product

S:\Projects\IMS\AEP\PAMDSITING\Maps\Focal Area Maps\FR_Conastone_MD_20170112.mxd



Legend

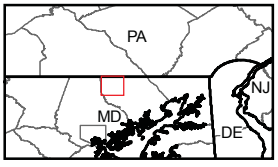
- Substation
- Existing Transmission Lines
- Project Focal Area
- County Boundary
- State Boundary

N

0 6,000 12,000 Feet

Coordinate System:
NAD 1983 UTM Zone 18N
Projection: Transverse Mercator
Linear Unit: Meter

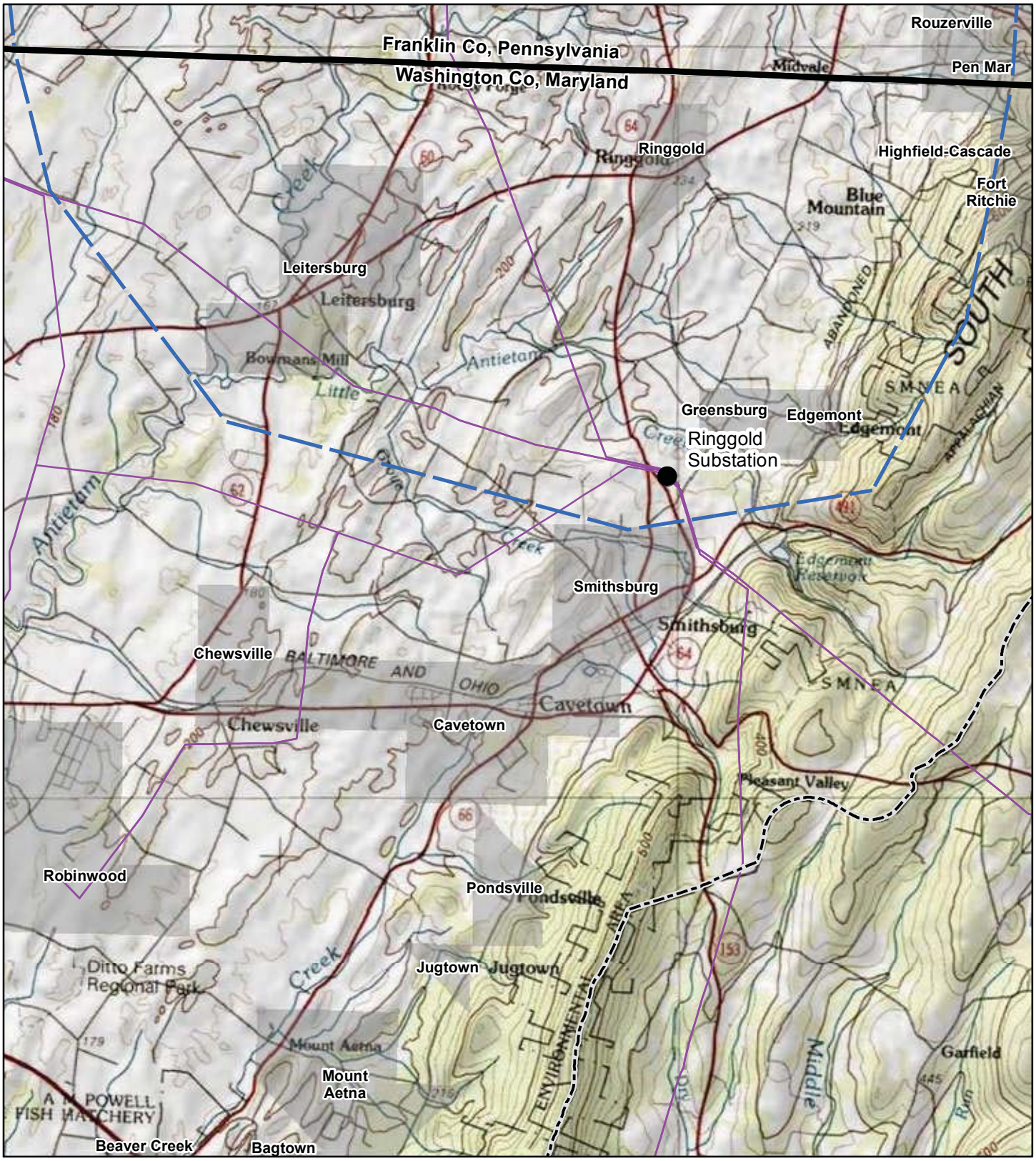
Data Sources:
Platts Power Map Transmission Line (2011)
USA Topo Maps (ESRI)



TRANSOURCE

Job: 60528995	Independence Energy Connection - East Transource, LLC Focal Area - MD
Prepared by: NB/BSF	
Checked by: HB	
Date: 1/27/2017	Confidential - Draft Work Product

S:\Projects\IMS\AEP\PAMDSITING\Maps\Focal Area Maps\FR_Conastone_MD_20170112.mxd



Legend

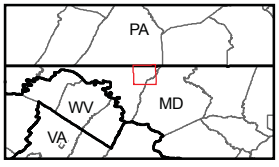
- Substation
- Existing Transmission Lines
- Project Focal Area
- County Boundary
- State Boundary

N

0 6,000 12,000 Feet

Coordinate System:
NAD 1983 UTM Zone 18N
Projection: Transverse Mercator
Linear Unit: Meter

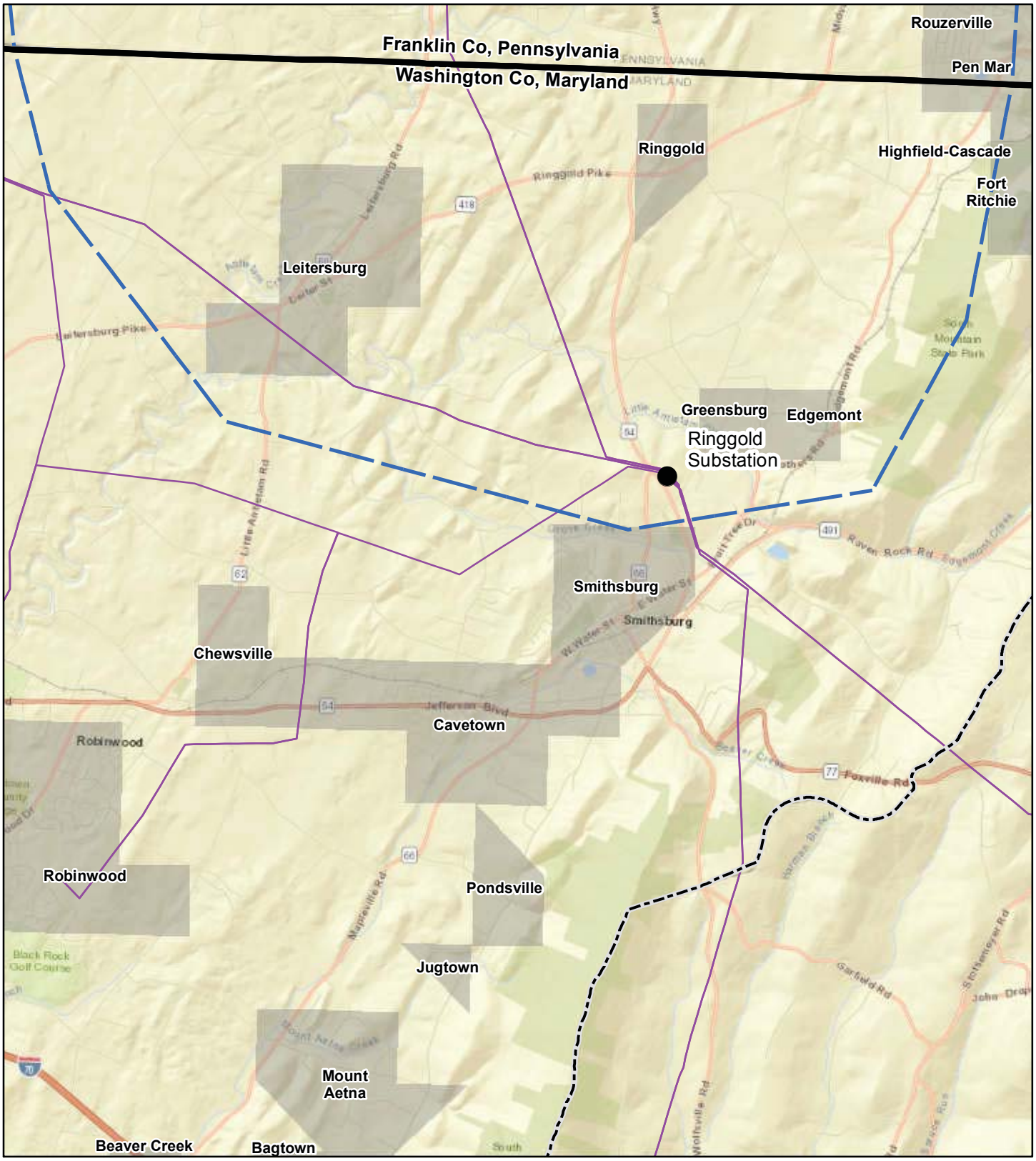
Data Sources:
Platts Power Map Transmission Line (2011)
USA Topo Maps (ESRI)



TRANSOURCE

Job: 60528995	Independence Energy Connection - West
Prepared by: NB/BSF	Transource, LLC
Checked by: HB	Focal Area - MD
Date: 1/30/2017	Confidential - Draft Work Product

S:\Projects\IMS\AEP\PAMDSITING\Maps\Focal Area Maps\Rice_Ringgold_MD_20170127.mxd



Legend

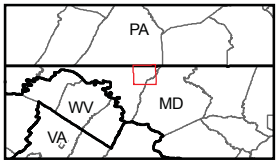
- Substation
- Existing Transmission Lines
- Project Focal Area
- County Boundary
- State Boundary

N

0 6,000 12,000 Feet

Coordinate System:
NAD 1983 UTM Zone 18N
Projection: Transverse Mercator
Linear Unit: Meter

Data Sources:
Platts Power Map Transmission Line (2011)
USA Topo Maps (ESRI)



TRANSOURCE

Job: 60528995	
Prepared by: NB/BSF	
Checked by: HB	
Date: 1/30/2017	

Independence Energy Connection - West
Transource, LLC
Focal Area - MD

Confidential - Draft Work Product

S:\Projects\IMS\AEP\PAMDSITING\Maps\Focal Area Maps\Rice_Ringgold_MD_20170127.mxd

AGENCY EMAILS

From: Frederick Kelley -DNR-
To: Laurie M Spears
Subject: [EXTERNAL] Re: Transource Project
Date: Thursday, March 02, 2017 1:41:09 PM

This is an EXTERNAL email. STOP. THINK before you CLICK links or OPEN attachments.

Thanks Laurie,

I'll look to attend the March 10th at MDA; it'll be good to get back up to speed on the Transource Project.

I'll also keep tabs on the JE meetings; we usually receive notices of upcoming meeting agendas.

Thanks,
Fred

On Mon, Feb 27, 2017 at 4:53 PM, Laurie M Spears <lmspears@aep.com> wrote:

> Fred,
>
> I'm sorry we missed you at our last meeting a few weeks ago. I wanted to give you a heads up that we are meeting with the Maryland Department of Agriculture on March 10 at 9 am at their offices in Annapolis (address below). I believe that some people from DNR may also attend but I haven't received a final headcount. You are more than welcome to attend that meeting with us if you would like.
>
> We are also on the schedule for March 29th for the MDE Joint Evaluation Meeting at the Fish and Wildlife office in Annapolis. You are welcome to attend that one as well. There is a chance we may get bumped to a different day due to the schedule but right now we are on for the 29th. We should have a better idea of our time slot as it gets closer to the date.
>
> Please let me know if you'll be able to attend any of these meetings or if you have any questions!
>
> Thanks!
>
> MDA Headquarters Address:
>
> 50 Harry S Truman Parkway

Annapolis, MD 21401

Laurie Spears

Sr. Siting Specialist

AEP Transmission

8500 Smith Mill Rd

New Albany, OH 43054

Office (614)-933-2625

Cell (440)-561-9202

Audinet 8-290-2625

lmspears@aep.com

--

MD Logo.png

dnr.maryland.gov

Frederick S. Kelley
Power Plant Research Program
Department of Natural Resources
Tawes Building B-3
Annapolis, MD 21401
410-260-8672 (office)
410-260-8670 (fax)
frederick.kelley@maryland.gov

Visit us on the web at -
http://dnr.maryland.gov/pprp

Click here to complete a three question customer experience survey.

From: Frederick Kelley -DNR-
To: Laurie M Spears
Subject: [EXTERNAL] Re: Notification zone
Date: Friday, March 31, 2017 4:03:03 PM

This is an EXTERNAL email. STOP. THINK before you CLICK links or OPEN attachments.

Hi Laurie,

500 feet sounds fine to us for this first round of notice. Will Transource eventually host any sort of informational website about the project? That might be good for sharing updates about the project as it progresses.

Have a great weekend,
Fred
On Fri, Mar 31, 2017 at 12:55 PM Laurie M Spears <lmspears@aep.com> wrote:

> Hi Fred,
>
> In follow up to our discussion earlier this week, is 500 feet on either side of centerline (1,000 ft corridor) sufficient from your perspective for the first round of open houses? We are up to 304 parcels on the west side and 359 parcels
>
> on the east side. Let me know your thoughts!
>
> Thank You!

Laurie Spears

Sr. Siting Specialist

AEP Transmission

8500 Smith Mill Rd

New Albany, OH 43054

Office (614)-933-2625

Cell (440)-561-9202

Audinet 8-290-2625

lmspears@aep.com

From: Laurie M Spears
To: Frederick Kelley (frederick.kelley@maryland.gov)
Subject: Transource Data
Date: Tuesday, May 02, 2017 11:38:00 AM

Fred,

I received a copy of the executed NDA and we are putting together the GIS files now. We plan to overnight you a CD with all the information and our study segments so you and your team can review. I am hoping to set up another in-person meeting with you before our open houses (June timeframe). Do you think that Thursday, May 18th would work for you and your team? I'm thinking a 2 hour meeting would probably be sufficient given the relatively short lengths in Maryland. Let me know your thoughts and if another date works better for your team.

Thank you!

Laurie Spears
Sr. Siting Specialist
AEP Transmission
8500 Smith Mill Rd
New Albany, OH 43054
Office (614)-933-2625
Cell (440)-561-9202
Audinet 8-290-2625
lmspears@aep.com



From: Frederick Kelley -DNR-
To: Laurie M Spears
Subject: Re: [EXTERNAL] Re: Transource Data
Date: Monday, May 08, 2017 10:51:44 AM

I'll look to get an invite out by the end of the day. Yes, data CD received and already under review by our integrators.

Thanks,
Fred

On Mon, May 8, 2017 at 8:24 AM, Laurie M Spears <lmspears@aep.com> wrote:

> That works great for us! Thanks Fred!
>
> Did you receive the shapefiles last week?
>
> Laurie Spears
>
> Sr. Siting Specialist
>
> AEP Transmission
>
> 8500 Smith Mill Rd
>
> New Albany, OH 43054
>
> Office (614)-933-2625
>
> Cell (440)-561-9202
>
> Audinet 8-290-2625
>
> lmspears@aep.com
>
> 
>

From: Frederick Kelley -DNR- [mailto:frederick.kelley@maryland.gov]
Sent: Friday, May 05, 2017 5:02 PM
To: Laurie M Spears
Subject: Re: [EXTERNAL] Re: Transource Data

I think Monday works best for most folks on PPRPs end. How about 2PM? If so I'll send around an invite and follow up with logistics.

Thanks,

Fred

On Fri, May 5, 2017 at 2:47 PM, Laurie M Spears <lmspears@aep.com> wrote:

Hi Fred,

Would Monday the 22nd or Tuesday the 23rd work for you?

Laurie

From: Frederick Kelley -DNR- [mailto:frederick.kelley@maryland.gov]
Sent: Tuesday, May 02, 2017 3:30 PM
To: Laurie M Spears
Subject: [EXTERNAL] Re: Transource Data

This is an EXTERNAL email. STOP. THINK before you CLICK links or OPEN attachments.

Thanks, I'll look forward to receiving it.

18th is in a very busy week for us; how about the following week?

Fred

On Tue, May 2, 2017 at 11:38 AM, Laurie M Spears <lmspears@aep.com> wrote:

Fred,

I received a copy of the executed NDA and we are putting together the GIS files now. We plan to overnight you a CD with all the information and our study segments so you and your team can review. I am hoping to set up another in-person meeting with you before our open houses (June timeframe). Do you think that Thursday, May 18th would work for you and your team? I'm thinking a 2 hour meeting would probably be sufficient given the relatively short lengths in Maryland. Let me know your thoughts and if another date works better for your team.

Thank you!

Laurie Spears

Sr. Siting Specialist

AEP Transmission

8500 Smith Mill Rd

New Albany, OH 43054

Office (614)-933-2625

Cell (440)-561-9202

Audinet 8-290-2625

lmspears@aep.com



--

dnr.maryland.gov	**Frederick S. Kelley** Power Plant Research Program Department of Natural Resources Tawes Building B-3 Annapolis, MD 21401 410-260-8672 (office) 410-260-8670 (fax) frederick.kelley@maryland.gov Visit us on the web at - http://dnr.maryland.gov/pprp

Click here to complete a three question customer experience survey.

--

dnr.maryland.gov	**Frederick S. Kelley** Power Plant Research Program Department of Natural Resources Tawes Building B-3 Annapolis, MD 21401 410-260-8672 (office) 410-260-8670 (fax) frederick.kelley@maryland.gov Visit us on the web at - http://dnr.maryland.gov/pprp

Click here to complete a three question customer experience survey.

Laurie - I have put a hold the downstairs conference room for July 14 at 1.

On Thu, Jun 22, 2017 at 10:10 AM, Carol West -MDA- <carol.west@maryland.gov> wrote:
I will work on securing a conference room. Say 1?

On Thu, Jun 22, 2017 at 10:08 AM, Laurie M Spears <lmspears@aep.com> wrote:
Carol,

The only day we would be able to get out there would be Friday the 14th. I agree Bill is important to have at that meeting. If we can reschedule to the 14th in the morning, I think that will work just fine.

Thanks!

Laurie Spears
Sr. Siting Specialist
AEP Transmission
8500 Smith Mill Rd
New Albany, OH 43054
Office (614)-933-2625
Cell (440)-561-9202
Audinet 8-290-2625
lmspears@aep.com



From: Carol West -MDA- [mailto:carol.west@maryland.gov]
Sent: Thursday, June 22, 2017 10:01 AM
To: Laurie M Spears
Subject: [EXTERNAL] Re: Transource Independence Energy Connection

This is an EXTERNAL email. STOP. THINK before you CLICK links or OPEN attachments.

Laurie - Bill Amoss, Harford County Program Administrator is on vacation the week of July 4 and is asking if we can reschedule to the following week. I would have no problem with that. He is an important player in this.

I am available on July 11 - 14 at any time.

On Mon, Jun 19, 2017 at 3:09 PM, Laurie M Spears <lmspears@aep.com> wrote:

Carol,

In follow up to our meeting on March 10, we are hoping to set up a time to meet with you and your team to give you an update on the Independence project. As you may recall, we are proposing to build two new transmission lines in Washington and Harford Counties. We held 6 open houses over the last two weeks in which we presented our study segments to the public to get feedback. We are hoping to give you an update on those open houses and talk about next steps. Would you and your team be available July 6 or 7th to have a meeting? I would think an hour and a half would be sufficient. Let us know if a time works for you or if we need to find a different day.

Thanks and we look forward to meeting with you again!

Laurie Spears
Sr. Siting Specialist
AEP Transmission
8500 Smith Mill Rd
New Albany, OH 43054
Office (614)-933-2625
Cell (440)-561-9202
Audinet 8-290-2625
lmspears@aep.com



--



Carol S. West
Executive Director, MALPF
Maryland Department of Agriculture
50 Harry S. Truman Parkway, Room 104
Annapolis, Maryland 21401

Office: 410-841-5860
Fax: 410-841-5730
http://mda.maryland.gov/malpf

Visit Our Website at: www.mda.maryland.gov

From: Laurie M Spears
To: Frederick Kelley (frederick.kelley@maryland.gov)
Subject: Transource IEC Project
Date: Monday, June 19, 2017 2:58:00 PM

Hi Fred,

Thanks again for stopping by our open houses last week. I think they went really well and we have gotten some great input. One item did come up that I think we should look into a little further and I'm hoping you can help me coordinate. A few landowners around Conastone mentioned they were working with MD DNR and USFWS to preserve bog turtle habitat. I think it's pretty critical to understand what is being proposed and where before we go too much further in siting. Do you think you could help coordinate a meeting or at least point us to the right person so we can set up a call to discuss? If these areas are being put into conservation easements, that would be good to know. Let me know how you want to proceed.
Thanks!

Laurie Spears
Sr. Siting Specialist
AEP Transmission
8500 Smith Mill Rd
New Albany, OH 43054
Office (614)-933-2625
Cell (440)-561-9202
Audinet 8-290-2625
lmspears@aep.com



From: Kelly Neff -MDE-
To: Elinsky, Stephen M CIV USARMY CENAB (US)
Cc: Laurie M Spears
Subject: [EXTERNAL] Re: Transource Independence Project (UNCLASSIFIED)
Date: Thursday, July 13, 2017 9:20:53 AM

This is an EXTERNAL email. STOP. THINK before you CLICK links or OPEN attachments.

MDE did a large mitigation site using Nontidal Wetland Compensation Fund money on the Lynn Farm property.

Kelly P. Neff
Maryland Department of the Environment
Wetlands and Waterways Program
Mitigation and Technical Assistance Section, Chief
1800 Washington Blvd., Suite 430
Baltimore, MD 21230-1708
(Phone) 410-537-4018
(Fax) 410-537-3751
Kelly.Neff@Maryland.gov

On Wed, Jul 12, 2017 at 2:18 PM, Elinsky, Stephen M CIV USARMY CENAB (US) <Steve.Elinsky@usace.army.mil> wrote:

> CLASSIFICATION: UNCLASSIFIED
>
> Hi Laurie,
>
> I'm unfamiliar with the site. However, I made a few calls and found out that MDE used the site for restorations and/or enhancements under their fee in lieu program. Kelly Neff from MDE who has been copied knows about the site and can answer your questions.
>
> Thanks,
>
> Steve
>
> Steve Elinsky
> Biologist
> U.S. Army Corps of Engineers - Baltimore District
> Regulatory Branch - Maryland Section Northern
> 410.962.4503
>
> -----Original Message-----
> From: Laurie M Spears [mailto:lmspears@aep.com]
> Sent: Wednesday, July 12, 2017 1:05 PM
> To: Elinsky, Stephen M CIV USARMY CENAB (US) <Steve.Elinsky@usace.army.mil>
> Subject: [Non-DoD Source] Transource Independence Project
>
> Hi Steve,

I wanted to follow up with you on a public comment we received at the open house. A landowner in Harford County stated they had an "old" wetland mitigation bank on their property (name is Jeffrey Lynn). Are you aware of any wetland mitigation banks in Harford County that we need to consider? This particular one is close to the MD/PA border. Any additional information that you have would be helpful!

Thanks!

Laurie Spears

Sr. Siting Specialist

AEP Transmission

8500 Smith Mill Rd

New Albany, OH 43054

Office (614)-933-2625

Cell (440)-561-9202

Audinet 8-290-2625

lmspears@aep.com <mailto:lmspears@aep.com>

CLASSIFICATION: UNCLASSIFIED

Click here to complete a three question customer experience survey.

Brewster, Heather

From: Carol West -MDA- <carol.west@maryland.gov>
Sent: Wednesday, August 23, 2017 9:52 AM
To: Brewster, Heather
Subject: Re: Transource IEC - Maryland Parcels with Ag Easements
Attachments: Transource IEC MD_ Agricultural Easements.xlsx

Heather - I was able to partially complete your chart. For the ones that I am not sure of, I reached out to the Harford and Washington County administrators. I have not heard back from the, so I am attaching my partially completed list. Hope this helps. If I get anything back from the administrators, I will forward it to you.

On Thu, Aug 17, 2017 at 3:42 PM, Brewster, Heather <Heather.Brewster@aecom.com> wrote:

Carol,

Just checking in to see how your progress is going assisting us with pulling the preservation deeds for the properties we provided to you. Any update is appreciated and if you have any questions or require anything from us, please just let me now. Thank you in advance.

Thank you ~Heather Brewster

610-832-8819

From: Brewster, Heather
Sent: Thursday, August 03, 2017 3:38 PM
To: 'carol.west@maryland.gov'
Cc: Laurie M Spears
Subject: Transource IEC - Maryland Parcels with Ag Easements

Carol,

Per my voicemail yesterday, on behalf of Laurie Spears/ Transource and their Independence Energy Connection Project, I am providing the attached list of parcels containing an Agricultural Easement in Washington and Harford Counties. At the last meeting held with Maryland Dept. of Agriculture, it was indicated you would be able to assist with pulling the easements for these parcels. With those easements in hand we can start identifying any easement language specific to limitations etc..for these parcels. If there is any additional information you would like to assist you in this effort, please just let me know.

Thank you. ~Heather

Heather Brewster

Associate Vice President

AECOM Environment

☎ 610-832-8819 (direct line)

✉ heather.brewster@aecom.com

215.869.4137 (mobile)

AECOM

625 West Ridge Pike, Conshohocken, Pennsylvania 19428

T 1-610-832-3500 F 1-610-832-3501

www.aecom.com



Please consider the environment before printing this email.

Built to deliver a better world

Twitter I Facebook I Instagram I Google+

--

CHANGING Maryland for the Better

Carol S. West
Executive Director, MALPF
Maryland Department of Agriculture
50 Harry S. Truman Parkway, Room 104
Annapolis, Maryland 21401

Office: 410-841-5860
Fax: 410-841-5730

Brewster, Heather

From: Davis, Tiffany - NRCS, Annapolis, MD <Tiffany.Davis@md.usda.gov>
Sent: Wednesday, September 06, 2017 11:05 AM
To: Brewster, Heather
Cc: Byam, Jackie - NRCS, Annapolis, MD; Esbensen, Gretchen - NRCS, Annapolis, MD; Jones, Hathaway - NRCS, Harrisburg, PA
Subject: RE: Transource - PA NRCS - Shapefiles for Review

Heather,

The Maryland GIS Specialist has reported both projects are all clear of FRPP in Maryland.

M. Tiffany Davis
Farm Bill Program Specialist (Easements)
339 Busch's Frontage Rd, Suite 301
Annapolis, MD 21409
Natural Resources Conservation Service
United States Department of Agriculture
http://www.md.nrcs.usda.gov
Desk Telephone 443-482-2960
Cell Telephone 443-477-1227

Stay Connected with USDA

From: Brewster, Heather [mailto:Heather.Brewster@aecom.com]
Sent: Tuesday, September 05, 2017 2:35 PM
To: Davis, Tiffany - NRCS, Annapolis, MD <Tiffany.Davis@md.usda.gov>
Subject: RE: Transource - PA NRCS - Shapefiles for Review

Tiffany,

Reaching out to see if you can be of any assistance with review of the shapefiles I provided last week for Non-Stewardship properties in Washington and Harford Counties. We checked the NRCS webviewer for Stewardship properties and avoided the one in Washington County. If you have any questions let me know and we appreciate any assistance.

Thank you ~Heather Brewster
610-832-8819

From: Brewster, Heather
Sent: Thursday, August 31, 2017 12:00 PM
To: Davis, Tiffany - NRCS, Annapolis, MD
Subject: RE: Transource - PA NRCS - Shapefiles for Review

Tiffany,

I have been working with Hathaway regarding PA NRCS easements. Transource would like NRCS MD to review their current Study Segments for the Independence Energy Connection electric transmission line project. We have researched the NRCS viewer for the Stewardship lands and are aware of those locations. However, we do want to get input for the additional data from 1996-2016 Non-

Stewardship easements. The attached shapefiles provide our Study Segments along with a 1,000 foot buffer that we would appreciate NRCS review on.

Next week we will be in the process of making some final decisions in regards to routing. Any information from NRCS would be greatly appreciated. If you have any questions about the attached information please let me know.

Thank you ~Heather Brewster
610-832-8819

From: Jones, Hathaway - NRCS, Harrisburg, PA [mailto:Hathaway.Jones@pa.usda.gov]
Sent: Thursday, August 31, 2017 11:35 AM
To: Brewster, Heather
Cc: Davis, Tiffany - NRCS, Annapolis, MD
Subject: RE: Transource - PA NRCS - Shapefiles for Review

Our review only covers easements in PA. You'll want to talk to Tiffany Davis – cc'd above.

Thanks.

Sincerely,
Hathaway Jones
Management Analyst
USDA/NRCS
359 East Park Drive, Suite 2
Harrisburg, PA 17111
717-237-2210
USDA is an equal opportunity provider, employer, and lender

From: Brewster, Heather [mailto:Heather.Brewster@aecom.com]
Sent: Thursday, August 31, 2017 10:48 AM
To: Jones, Hathaway - NRCS, Harrisburg, PA <Hathaway.Jones@pa.usda.gov>
Subject: RE: Transource - PA NRCS - Shapefiles for Review

Hathaway,

Does your review only cover PA? If so, who in MD do I touch base with for a similar review?

Thank you ~Heather Brewster
610-832-8819

From: Jones, Hathaway - NRCS, Harrisburg, PA [mailto:Hathaway.Jones@pa.usda.gov]
Sent: Thursday, August 31, 2017 8:46 AM
To: Brewster, Heather
Cc: Laurie M Spears
Subject: RE: Transource - PA NRCS - Shapefiles for Review

Heather,

Good morning. The GIS staff has mapped the shape files of the pipeline.

The proposed pipeline intersects 16 federal agricultural land preservation easements.

Sincerely,

Hathaway Jones

Management Analyst
USDA/NRCS
359 East Park Drive, Suite 2
Harrisburg, PA 17111
717-237-2210
USDA is an equal opportunity provider, employer, and lender

From: Brewster, Heather [mailto:Heather.Brewster@aecom.com]
Sent: Tuesday, August 29, 2017 11:12 AM
To: Jones, Hathaway - NRCS, Harrisburg, PA <Hathaway.Jones@pa.usda.gov>
Cc: Laurie M Spears <lmspears@aep.com>
Subject: Transource - PA NRCS - Shapefiles for Review

Hathaway,

Transource would like to go ahead and provide NRCS their current Study Segment shapefiles for review, without requesting a Non-disclosure. We have researched the viewer at the link below. However, we do want to get input for the additional data from 1996-2016 that you reference below. The attached shapefiles provide our Study Segments along with a 1,000 foot buffer that we would appreciate NRCS review on.

Next week we will be in the process of making some final decisions in regards to routing. Any information from NRCS would be greatly appreciated. If you have any questions about the attached information please let me know.

Thank you ~Heather Brewster
610-832-8819

From: Jones, Hathaway - NRCS, Harrisburg, PA [mailto:Hathaway.Jones@pa.usda.gov]
Sent: Monday, August 21, 2017 8:06 AM
To: Brewster, Heather
Subject: PA NRCS - Gas pipeline shape files and non-disclosure agreement for FOIA?

Heather,

I received the email below from our FOIA administrator. NRCS would likely not be able to sign a non-disclosure agreement.

You can view NRCS easements on the National Easements Database at this link: http://nrcs.maps.arcgis.com/apps/webappviewer/index.html?id=60cb4564f7b4461ca9a61fa224c066ba

You can zoom in to specific locations in Pennsylvania to determine where easements are located.

HOWEVER – this map shows only what NRCS calls 'stewardship lands'. Therefore the map only includes ag easements acquired between 2006 and 2008. NRCS has many, many ag easements acquired from 1996 – 2016 that are NOT stewardship and that do not show up on the map.

That being said, you will be able to see our wetland easements clearly from the database. These easements are very restrictive and will not allow a ROW installation.

Thanks much.

Sincerely,

Hathaway Jones
Management Analyst
USDA/NRCS
359 East Park Drive, Suite 2
Harrisburg, PA 17111
717-237-2210
USDA is an equal opportunity provider, employer, and lender

From: Kling, Andrew - NRCS, Harrisburg, PA
Sent: Thursday, August 17, 2017 2:25 PM
To: Jones, Hathaway - NRCS, Harrisburg, PA <Hathaway.Jones@pa.usda.gov>; Smith, Shozette - NRCS, Harrisburg, PA <Shozette.Smith@pa.usda.gov>
Subject: RE: Gas pipeline shape files and non-disclosure agreement for FOIA?

It is our policy now to direct companies asking for easement locations to go to the national site that shows all of the NRCS easements.

As far as a non-disclosure agreement, I would doubt that we would sign it as we have regulation about what we can and can't disclose, FOIA included.

Andy

This electronic message contains information generated by the USDA solely for the intended recipients. Any unauthorized interception of this message or the use or disclosure of the information it contains may violate the law and subject the violator to civil or criminal penalties. If you believe you have received this message in error, please notify the sender and delete the email immediately.

Appendix C: Aerial Mapbook



Legend

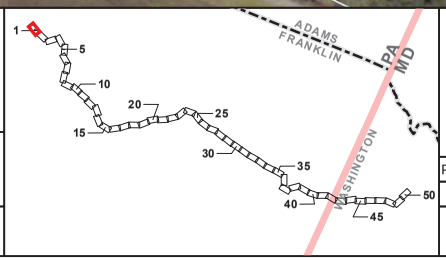
- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed.
Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

REFERENCES:
NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:
NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 1

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed.
Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

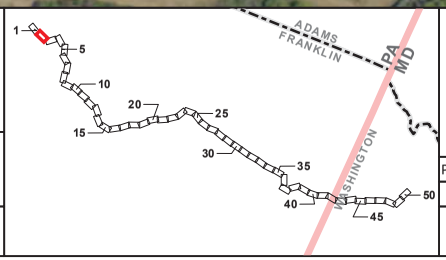
REFERENCES:

NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:

NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 2

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed. Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

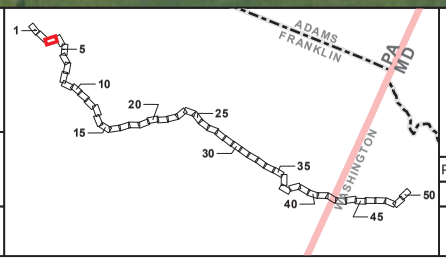
REFERENCES:

NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:

NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project Aerial Mapbook

Map Extent 3

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed.
Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

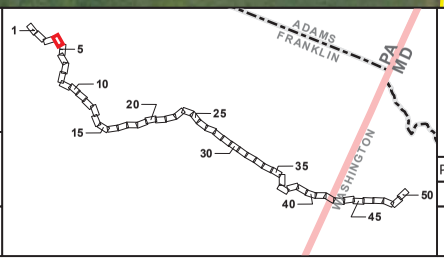
REFERENCES:

NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:

NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 4

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed.
Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

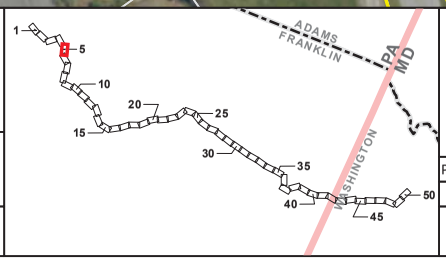
REFERENCES:

NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:

NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 5

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

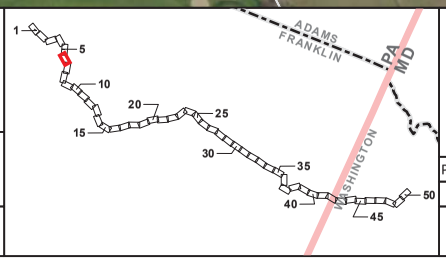
- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed.
Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

REFERENCES:
NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:
NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 6

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed. Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

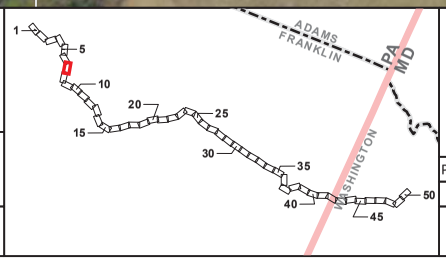
REFERENCES:

NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:

NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 7

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

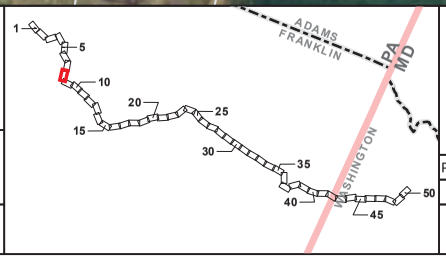
- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed.
Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

REFERENCES:
NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

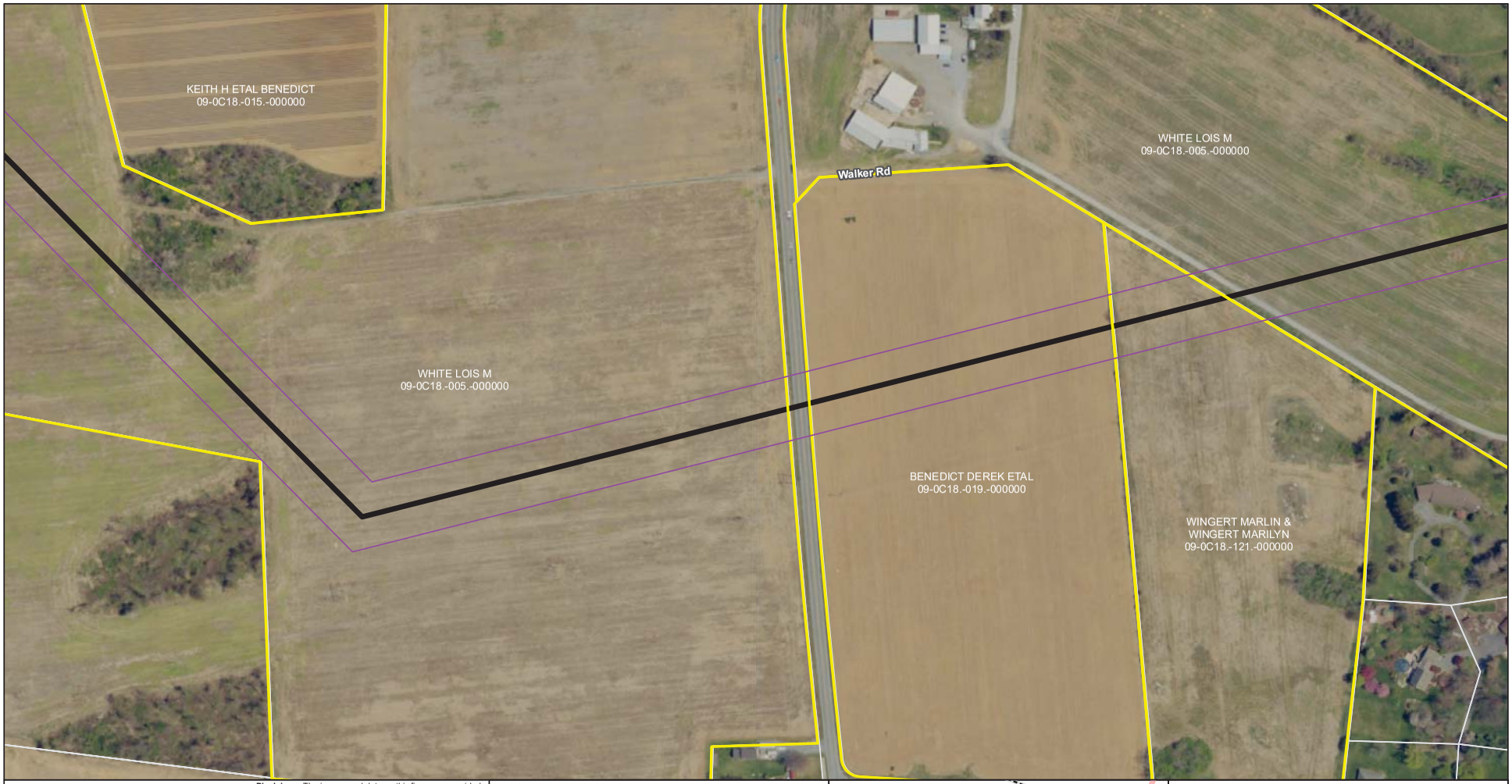
0 200 400 Feet

COORDINATE SYSTEM:
NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 8

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed. Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

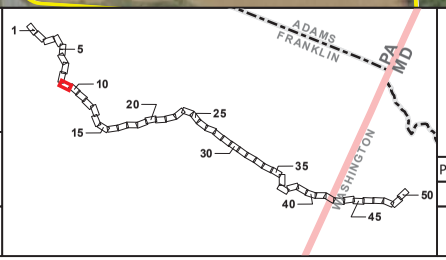
REFERENCES:

NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

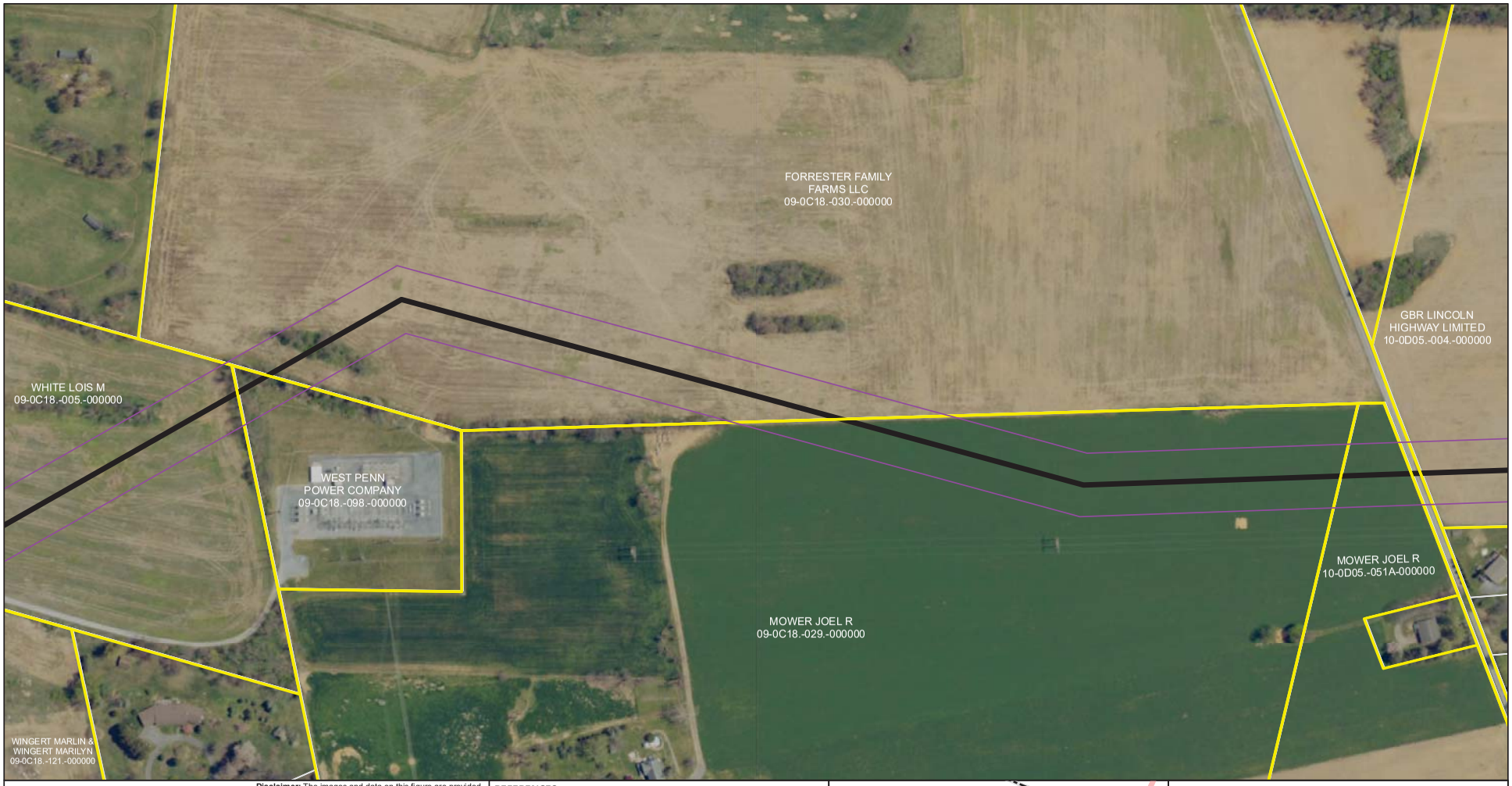
COORDINATE SYSTEM:

NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 9

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed. Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

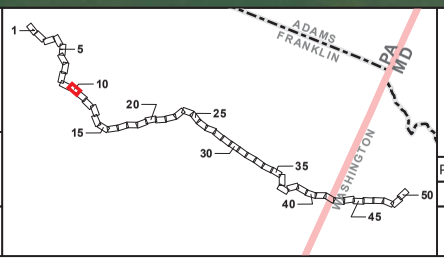
REFERENCES:

NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:

NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 10

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

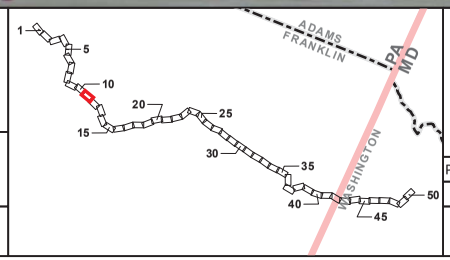
- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed.
Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

REFERENCES:
NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:
NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 11

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed. Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

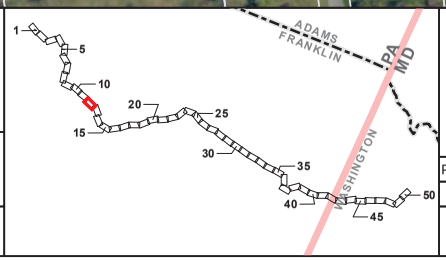
REFERENCES:

NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:

NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project Aerial Mapbook

Map Extent 12

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed.
Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

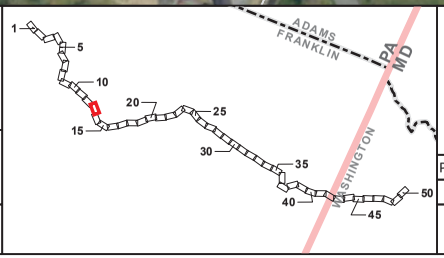
REFERENCES:

NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

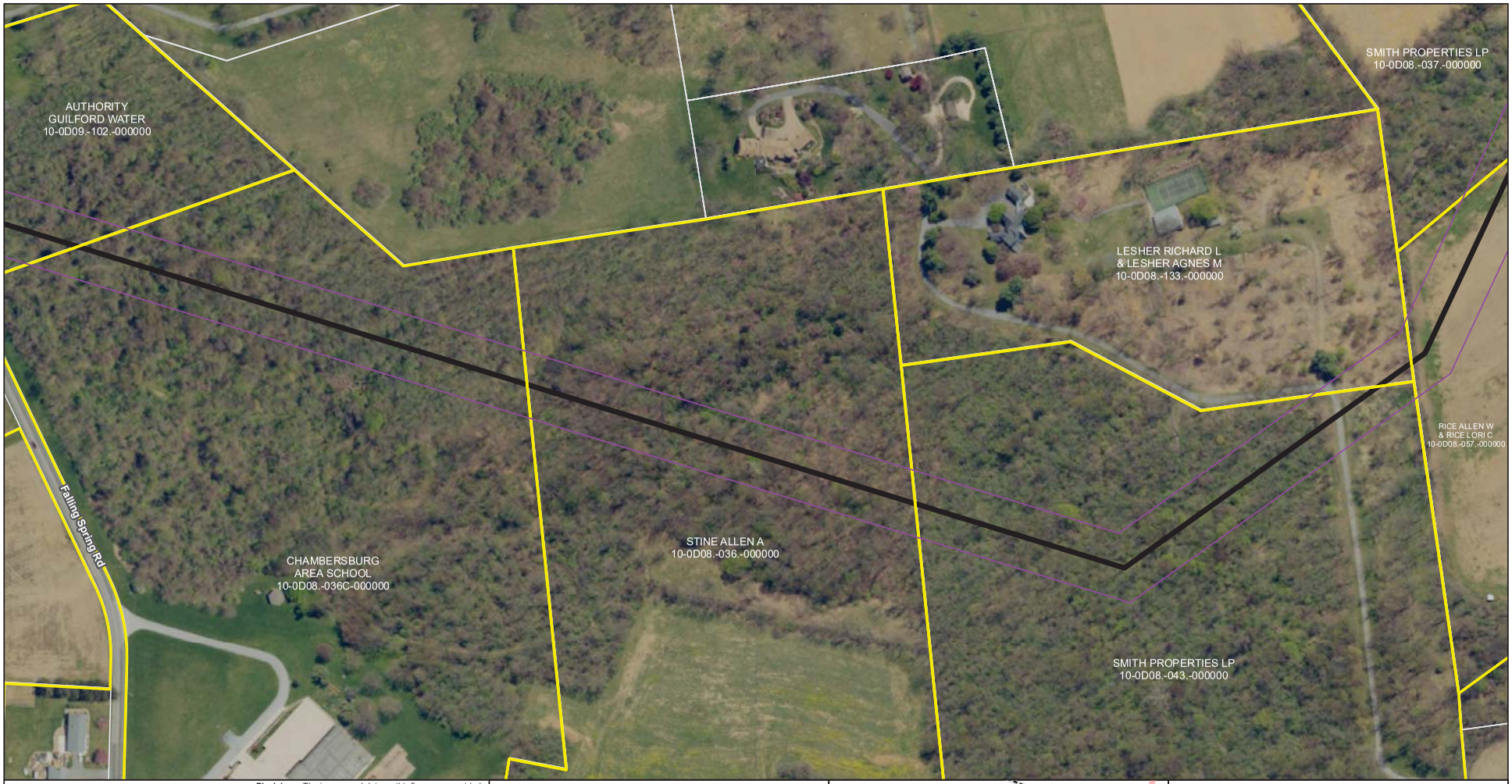
COORDINATE SYSTEM:

NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 13

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed.
Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

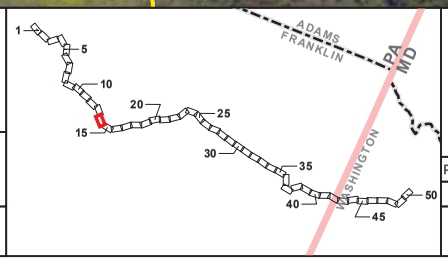
REFERENCES:

NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

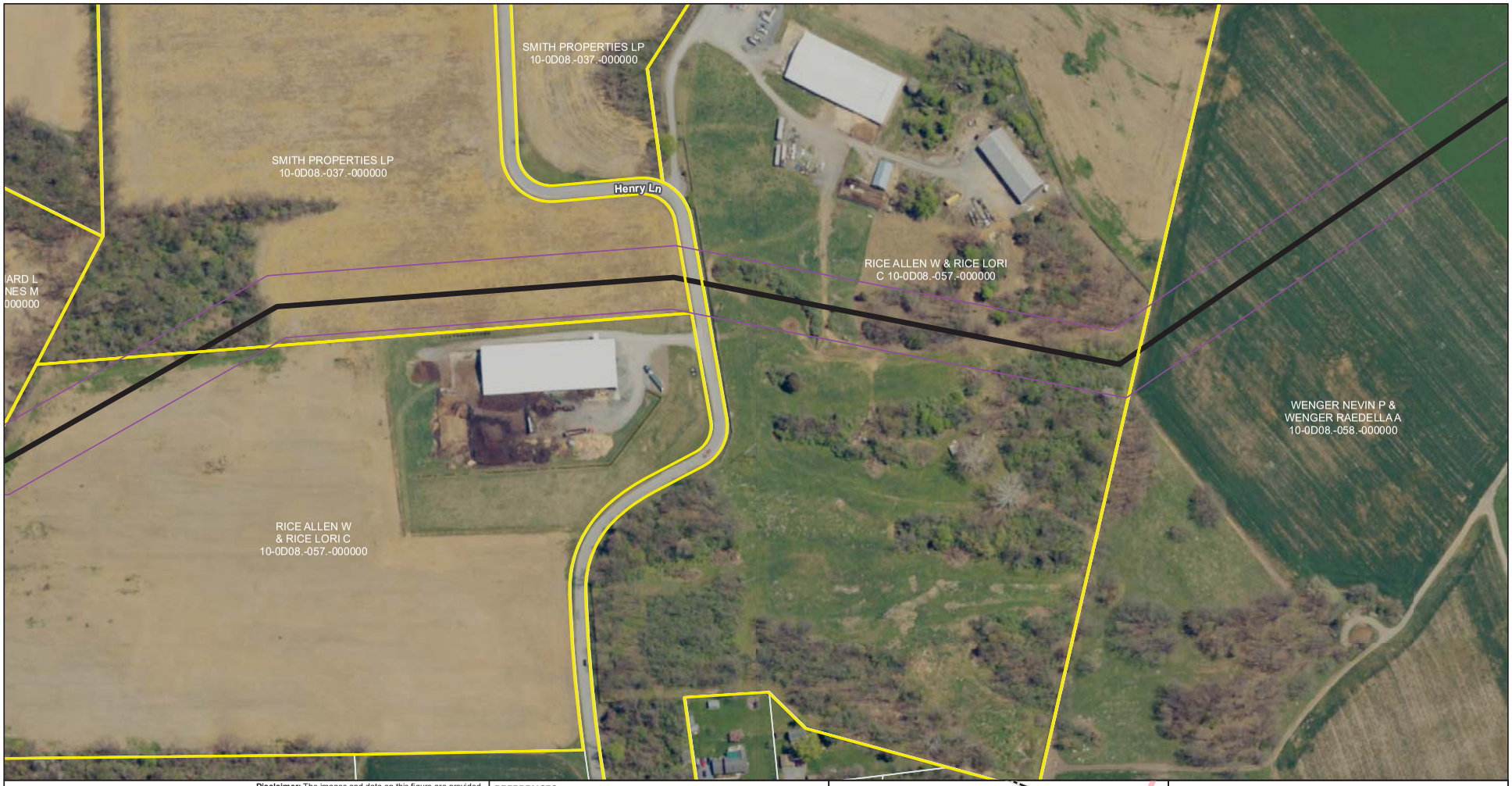
COORDINATE SYSTEM:

NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 14

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

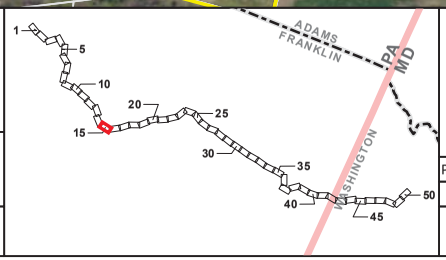
- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed.
Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

REFERENCES:
NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:
NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 15

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed.
Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

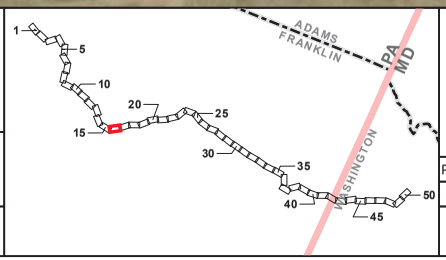
REFERENCES:

NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:

NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 16

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed. Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

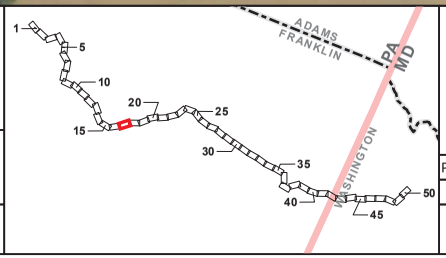
REFERENCES:

NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:

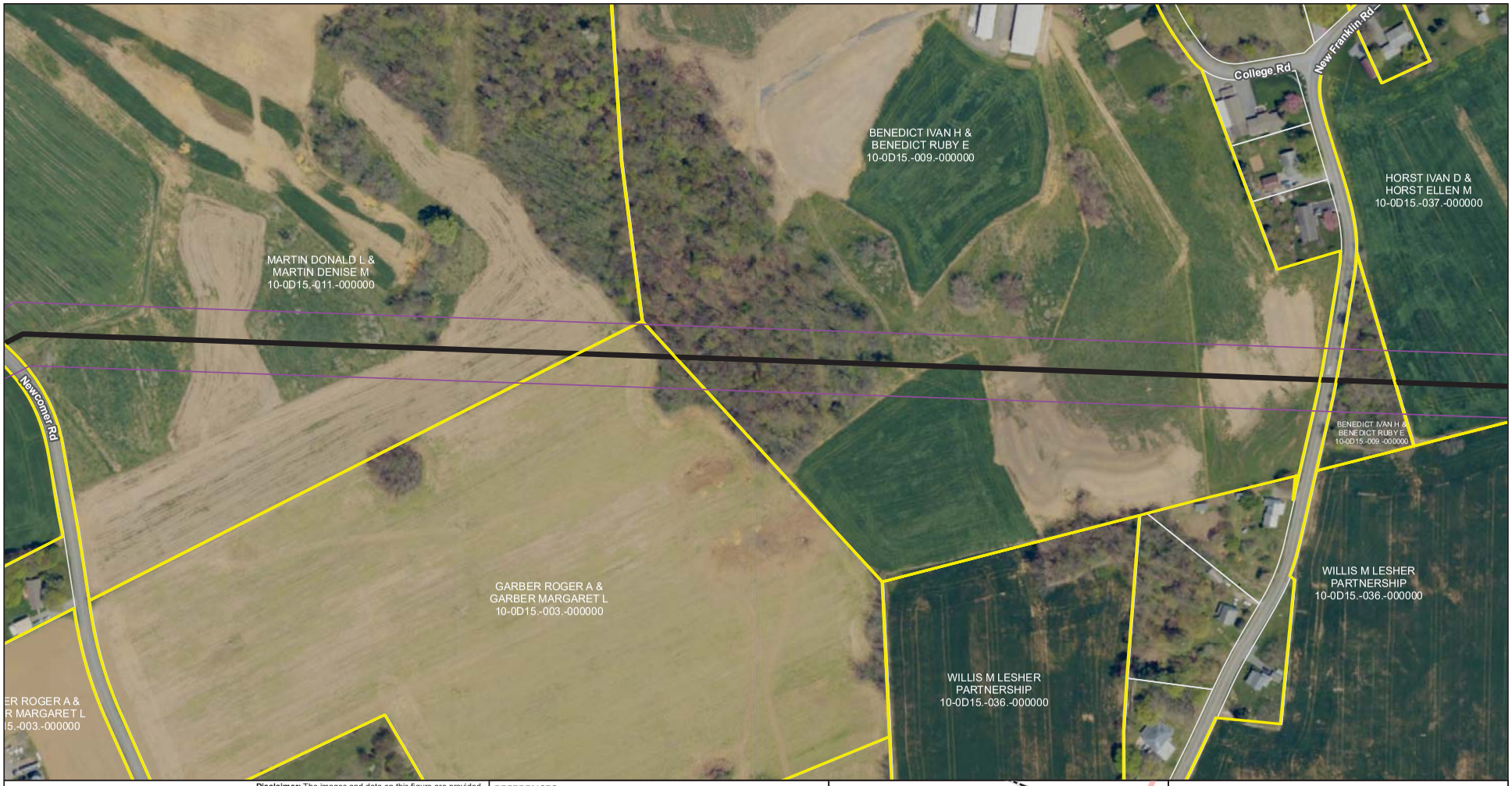
NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project Aerial Mapbook

Map Extent 17

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed.
Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

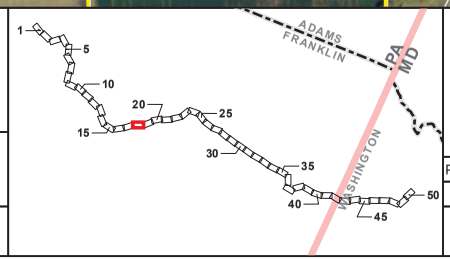
REFERENCES:

NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:

NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 18

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

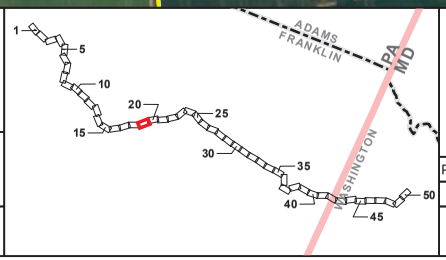
- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed.
Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

REFERENCES:
NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:
NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 19

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed.
Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

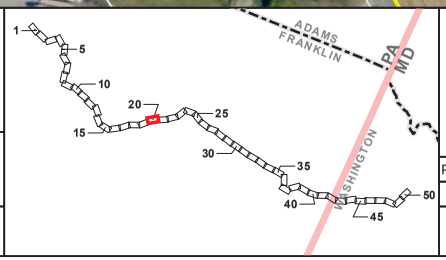
REFERENCES:

NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:

NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 20

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed. Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

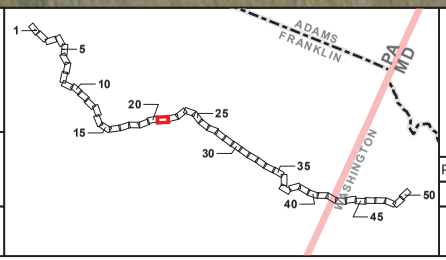
REFERENCES:

NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:

NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 21

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed.
Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

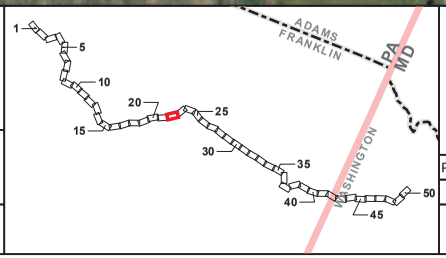
REFERENCES:

NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:

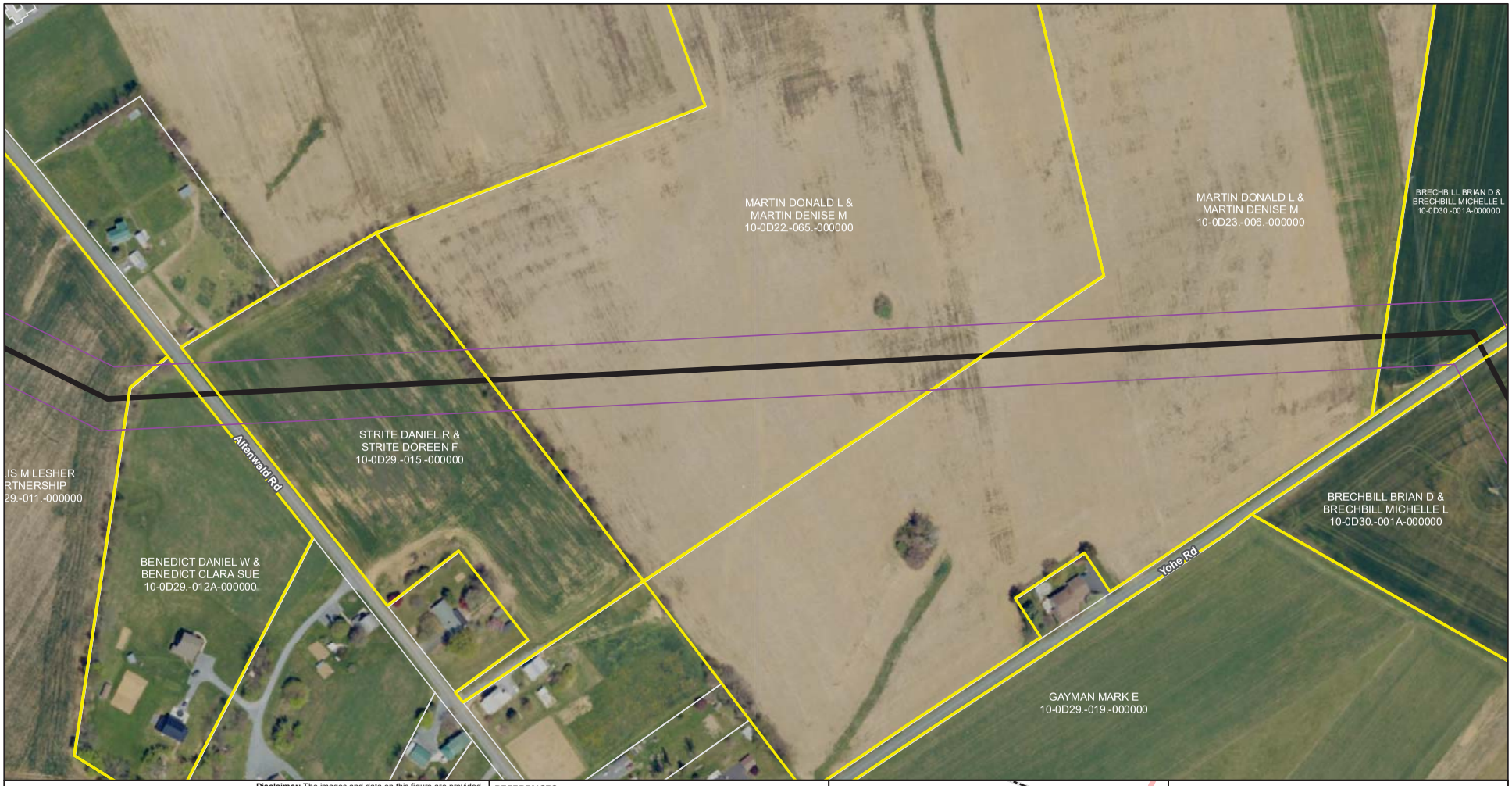
NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project Aerial Mapbook

Map Extent 22

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed.
Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

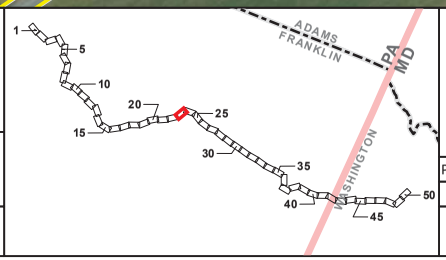
REFERENCES:

NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

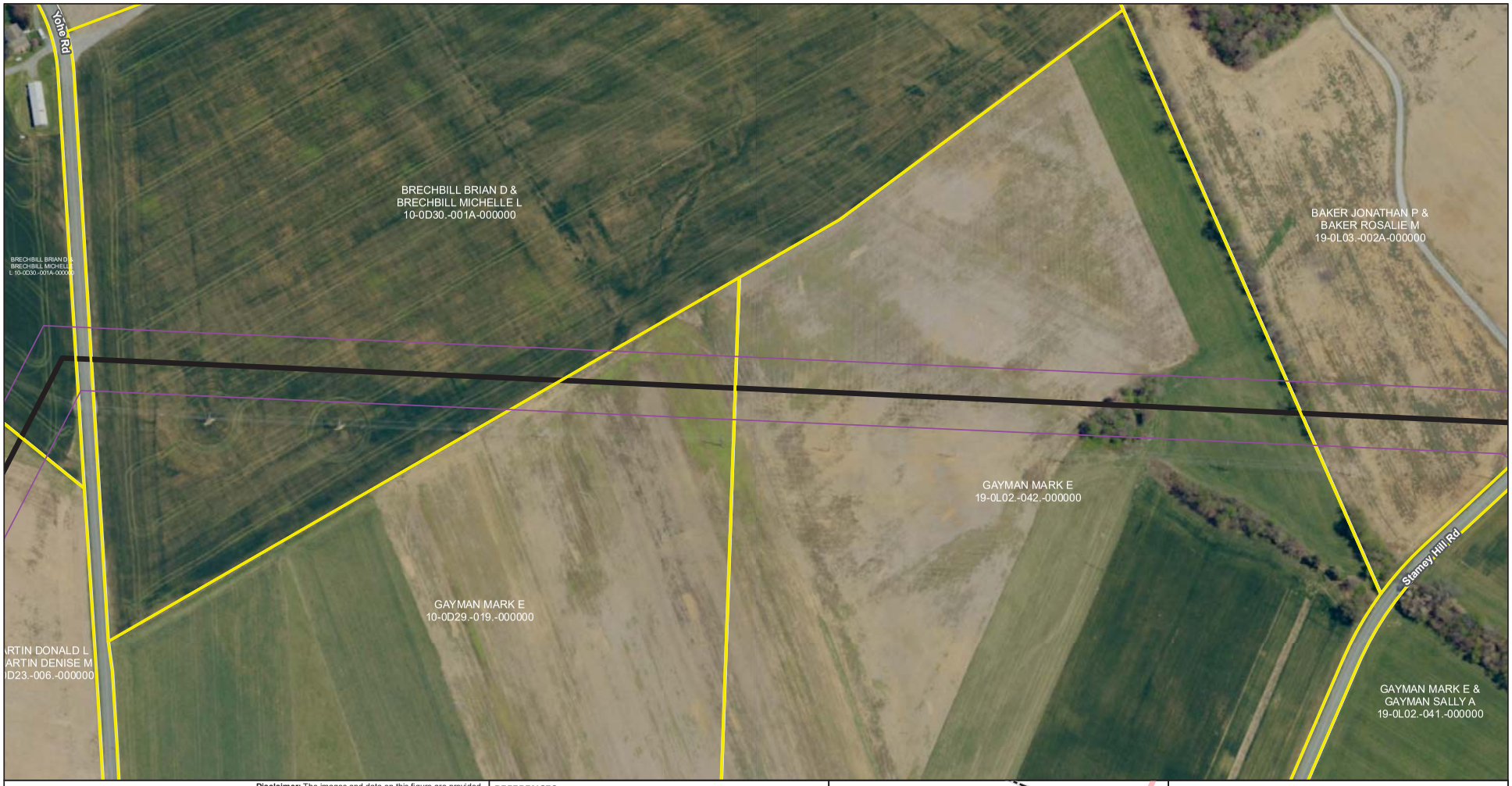
COORDINATE SYSTEM:

NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 23

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

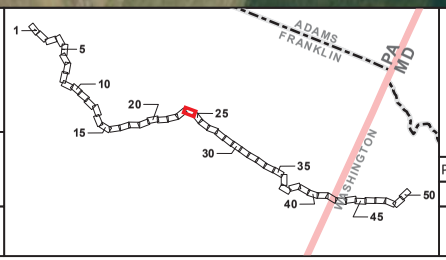
- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed.
Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

REFERENCES:
NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:
NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 24

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed. Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

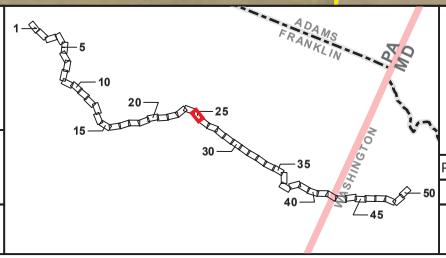
REFERENCES:

NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:

NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project Aerial Mapbook

Map Extent 25

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed.
Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

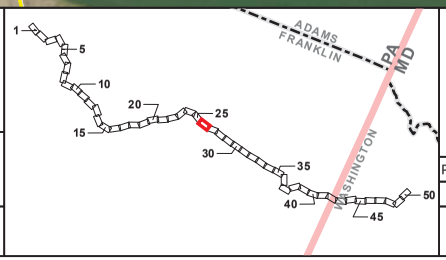
REFERENCES:

NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:

NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 26

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed. Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

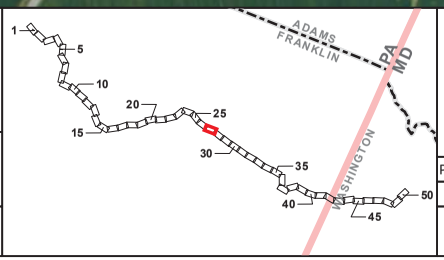
REFERENCES:

NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:

NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project Aerial Mapbook

Map Extent 27

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed.
Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

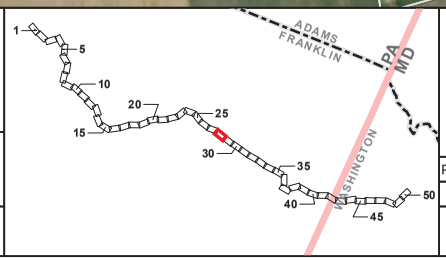
REFERENCES:

NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:

NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 28

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed.
Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

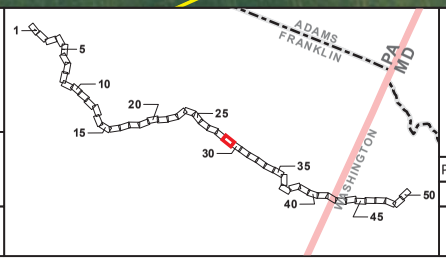
REFERENCES:

NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:

NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 29

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed.
Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

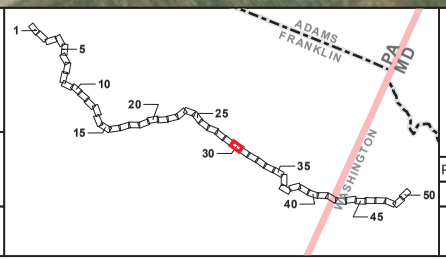
REFERENCES:

NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:

NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 30

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed.
Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

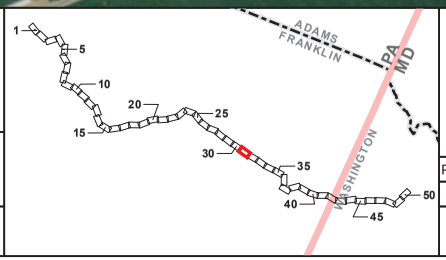
REFERENCES:

NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:

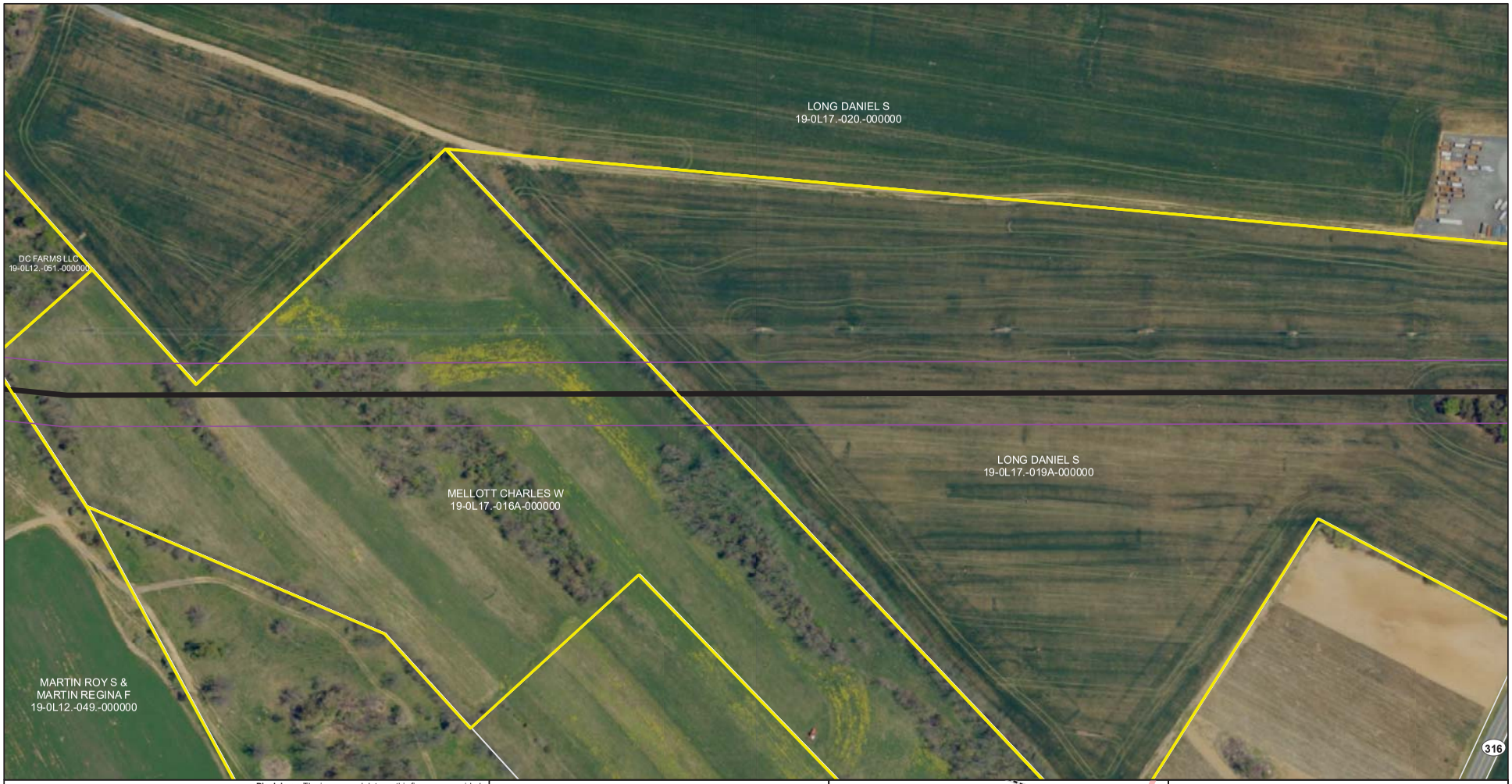
NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project Aerial Mapbook

Map Extent 31

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed. Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

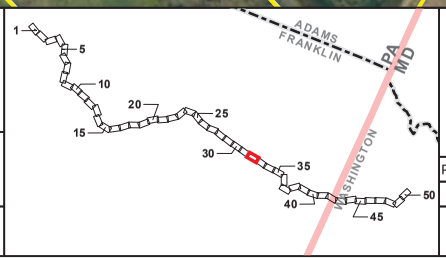
REFERENCES:

NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:

NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 32

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed. Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

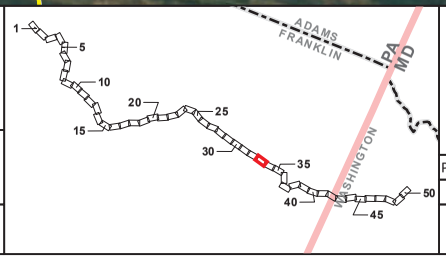
REFERENCES:

NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:

NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 33

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

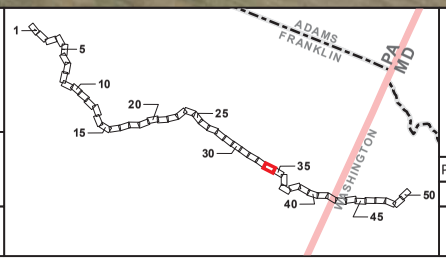
- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed.
Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

REFERENCES:
NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:
NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 34

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

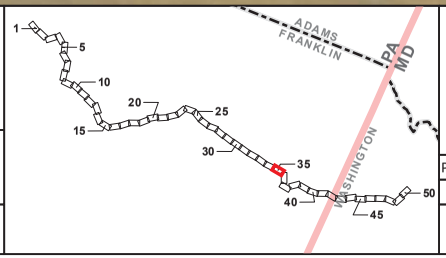
- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed.
Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

REFERENCES:
NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:
NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 35

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed.
Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

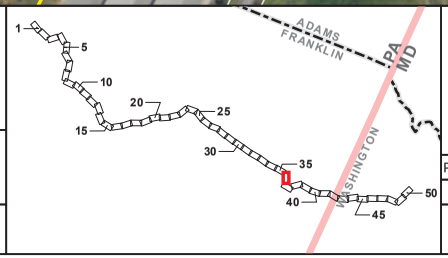
REFERENCES:

NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:

NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project Aerial Mapbook

Map Extent 36

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

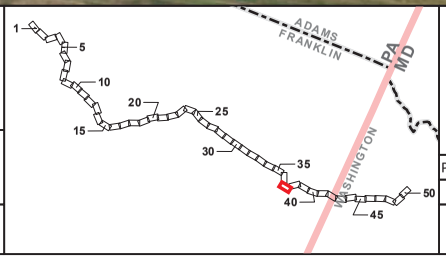
- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed.
Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

REFERENCES:
NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:
NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 37

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed. Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

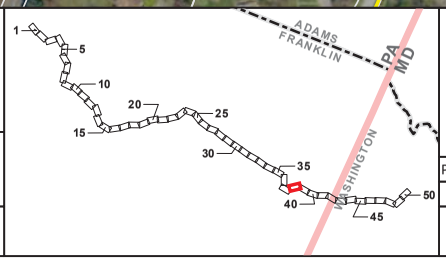
REFERENCES:

NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:

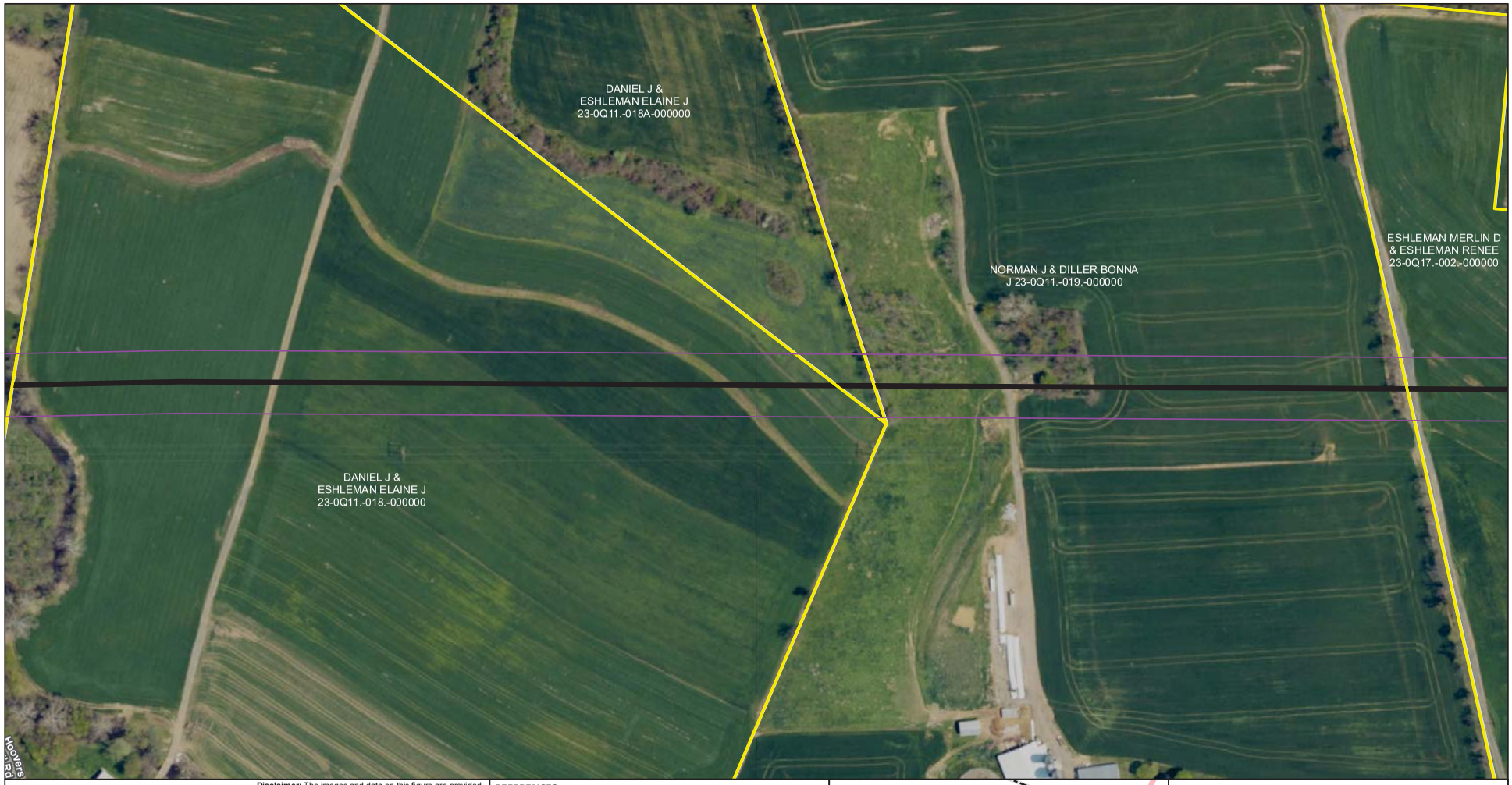
NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project Aerial Mapbook

Map Extent 38

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

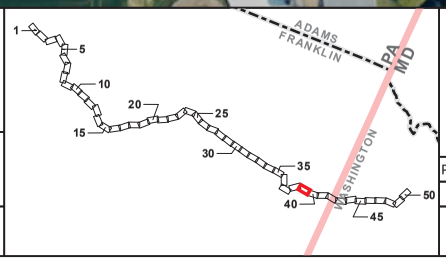
- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed.
Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

REFERENCES:
NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:
NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 39

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

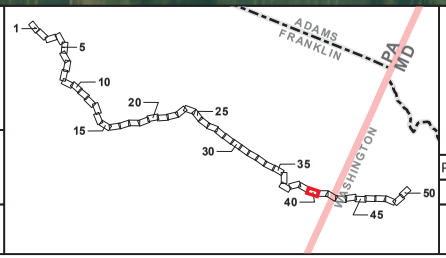
- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed.
Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

REFERENCES:
NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:
NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 40

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed. Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

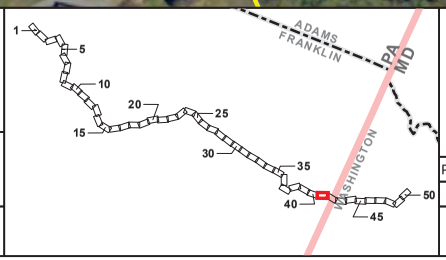
REFERENCES:

NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:

NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project Aerial Mapbook

Map Extent 41

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed. Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

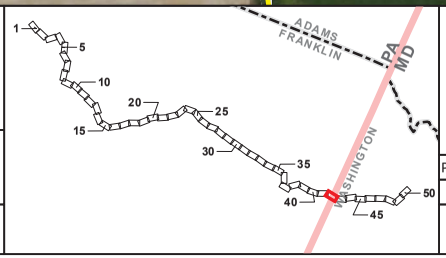
REFERENCES:

NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:

NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project Aerial Mapbook

Map Extent 42

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed.
Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

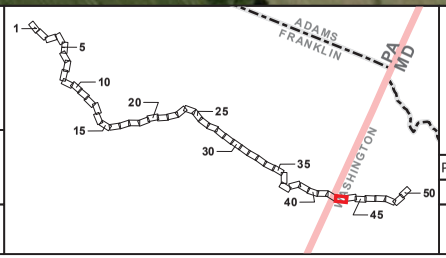
REFERENCES:

NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

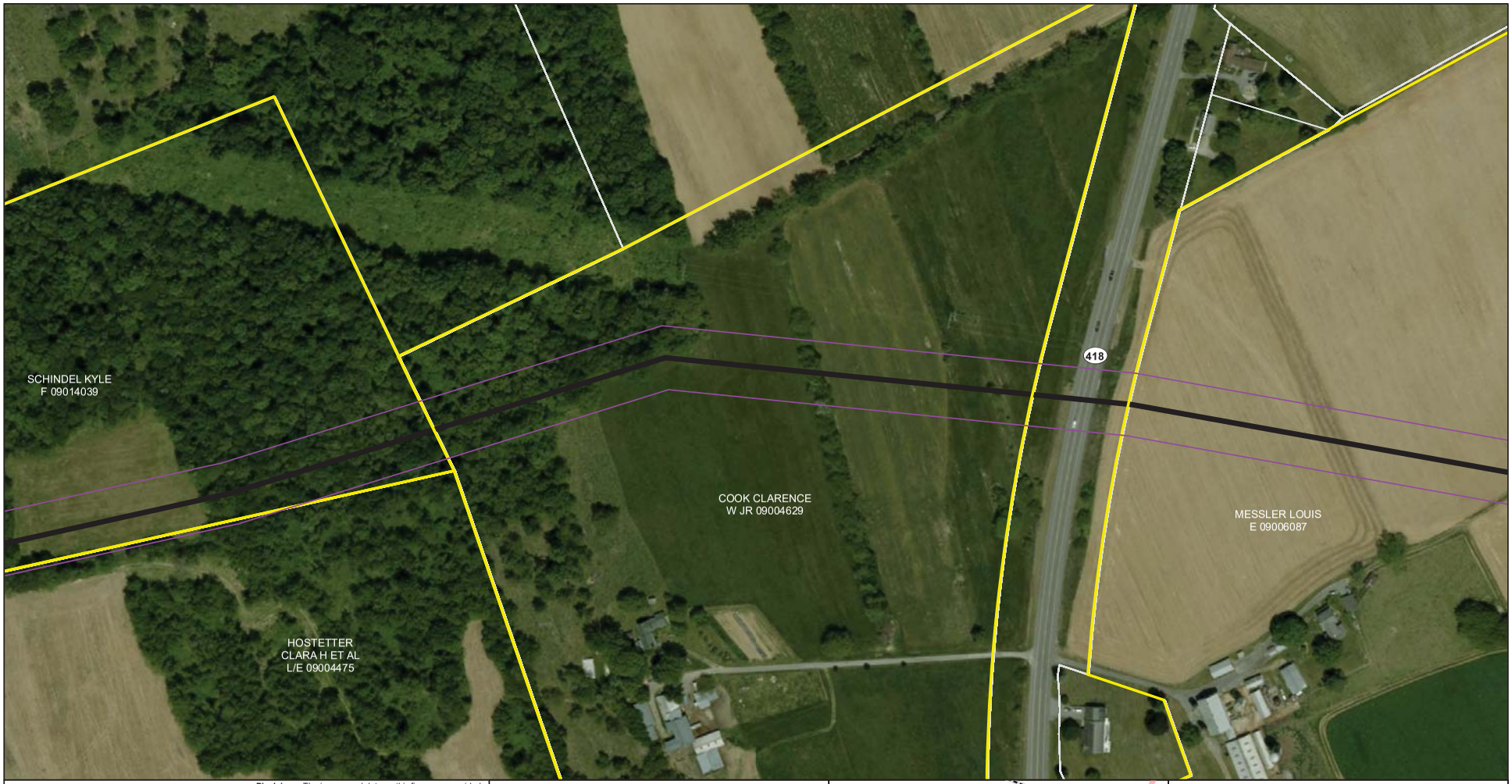
COORDINATE SYSTEM:

NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 43

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed. Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

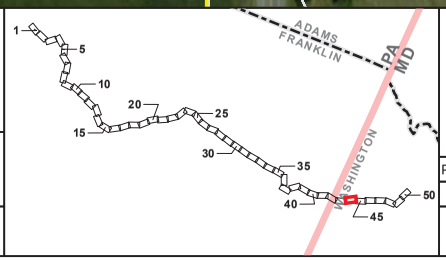
REFERENCES:

NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:

NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 44

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

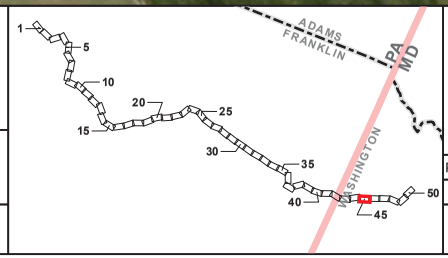
- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed.
Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

REFERENCES:
NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:
NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 45

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed.
Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

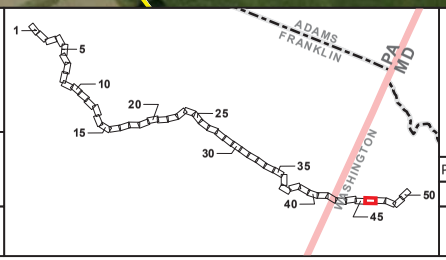
REFERENCES:

NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

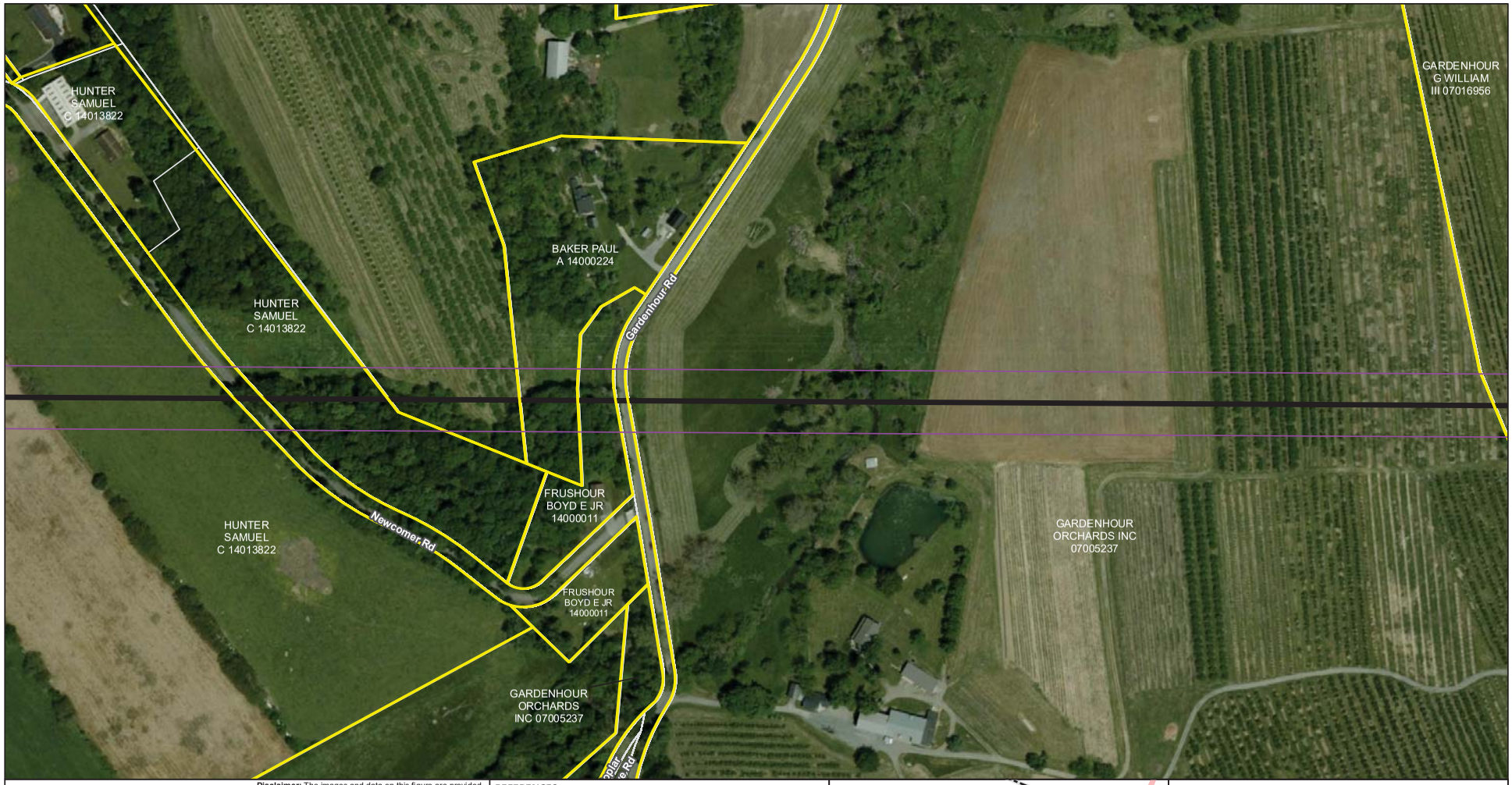
COORDINATE SYSTEM:

NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 46

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed.
Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

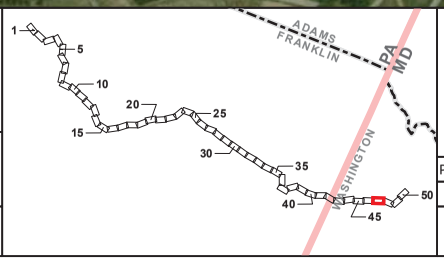
REFERENCES:

NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:

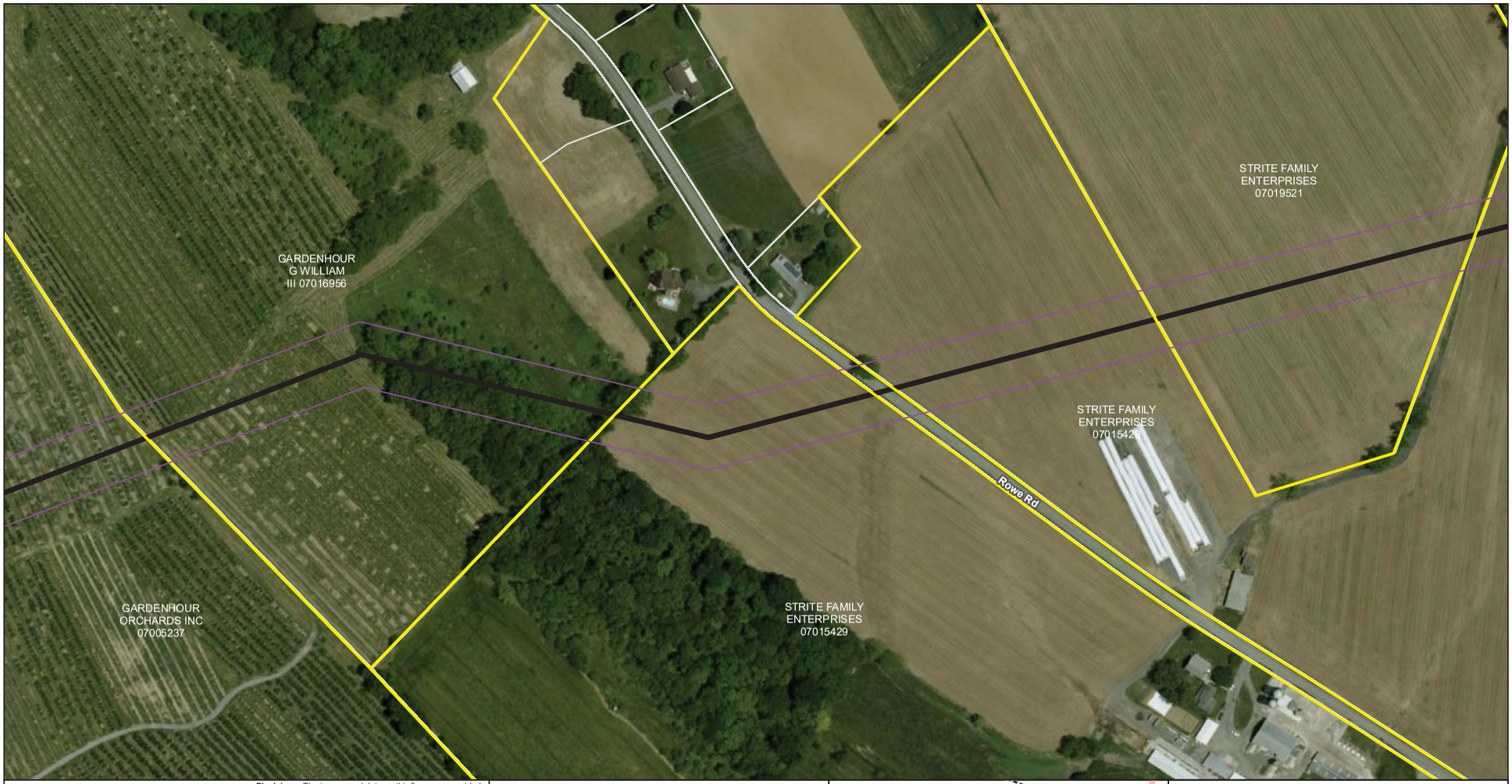
NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project Aerial Mapbook

Map Extent 47

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed.
Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

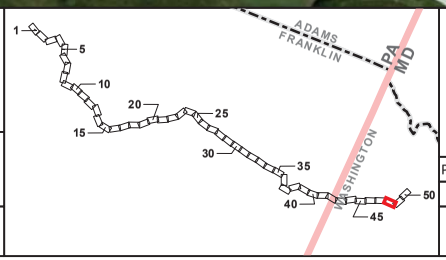
REFERENCES:

NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

COORDINATE SYSTEM:

NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 48

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed.
Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

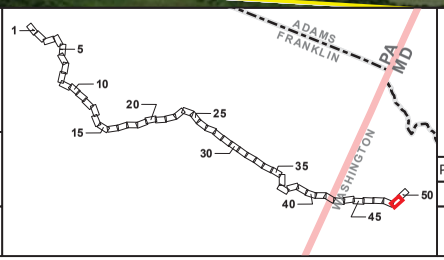
REFERENCES:

NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

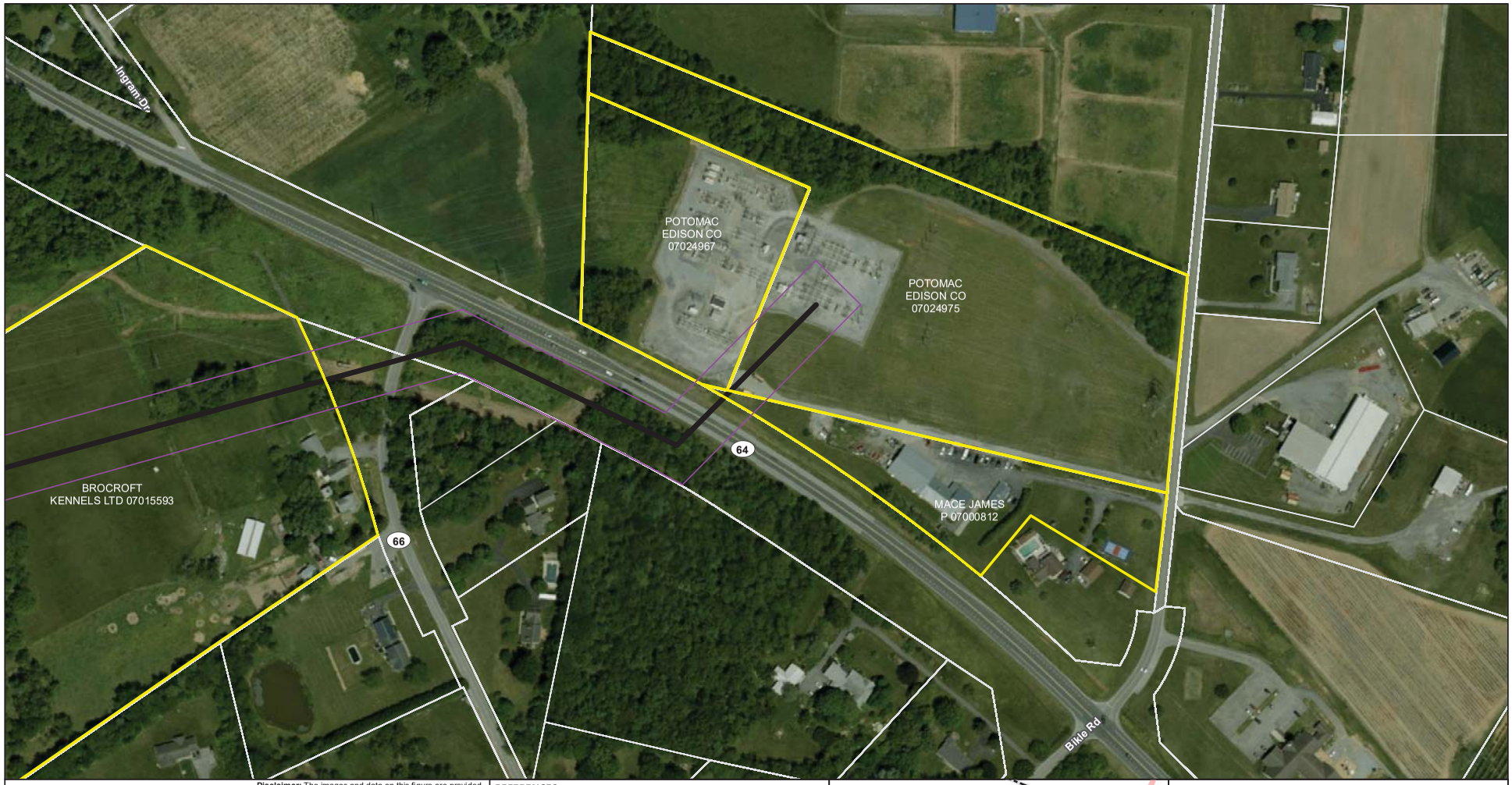
COORDINATE SYSTEM:

NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 49

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026



Legend

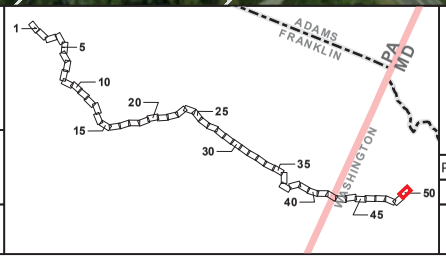
- Proposed Route C
- Proposed Route C ROW
- Parcels Crossed by Proposed ROW
- Parcel Boundary

Disclaimer: The images and data on this figure are provided by Transource, LLC for information purposes only and represent only approximate locations and distances since final detailed survey and related field work have not yet been completed.
Transource LLC. makes no warranty with respect to the accuracy of the images or information reflected on this figure. The property lines shown on this figure are based on tax parcel data obtained from the County and does not constitute legal description of any of the applicable land parcels.

REFERENCES:
NAIP Basemap PA (2022)
NAIP Basemap MD (2023)
Franklin County GIS Office (2025)
Washington County GIS Office (2025)

0 200 400 Feet

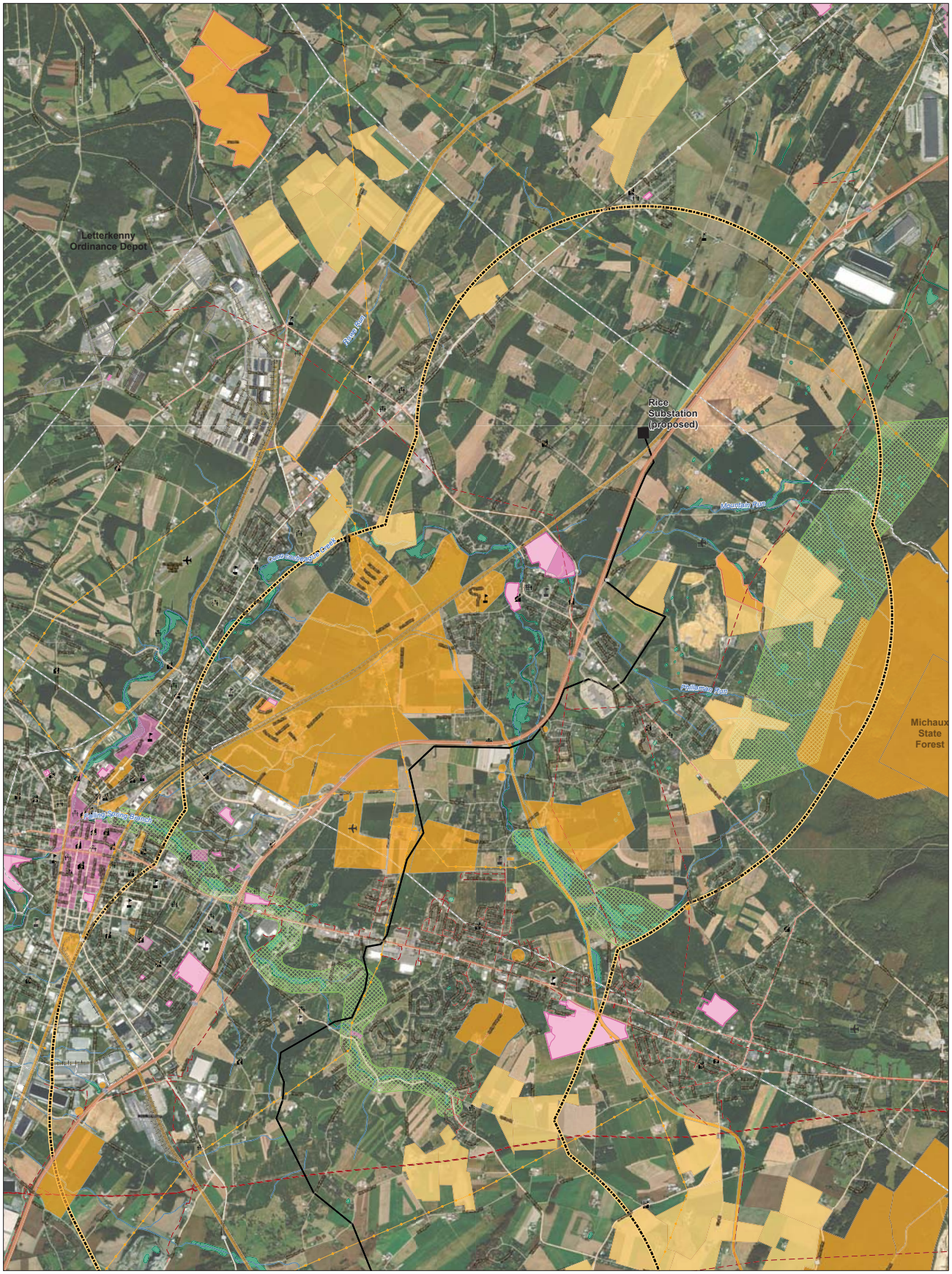
COORDINATE SYSTEM:
NAD 1983 UTM Zone 18 North
Projection: Transverse Mercator; Units: Meter



Rice - Ringgold 230 kV Transmission Line Project
Aerial Mapbook
Map Extent 50

Prepared By: MWC	Checked By: HB
Job: 60528995	Date: May 02, 2026

Appendix D: Proposed Route 2 Mile Overview Drawing (Figure 16)



Legend

- Airports
- Schools
- Churches
- Cemeteries
- Proposed Route C
- 2 Mile Buffer
- Existing Transmission Line
- Less than 100 kV
- 115kV - 230 kV
- Greater than 345kV
- Gas Pipeline
- Railroad
- Stream
- NRHP Listed Above Ground Resource
- NRHP Eligible Above Ground Resource
- NRHP Listed Historic District
- NRHP Eligible Historic District
- USDA Agricultural Conservation Easement
- State Agricultural Preservation
- National Park
- Federal Land
- State Land
- Local Park
- PA Core Habitat of Biological Diversity Area
- Wetland

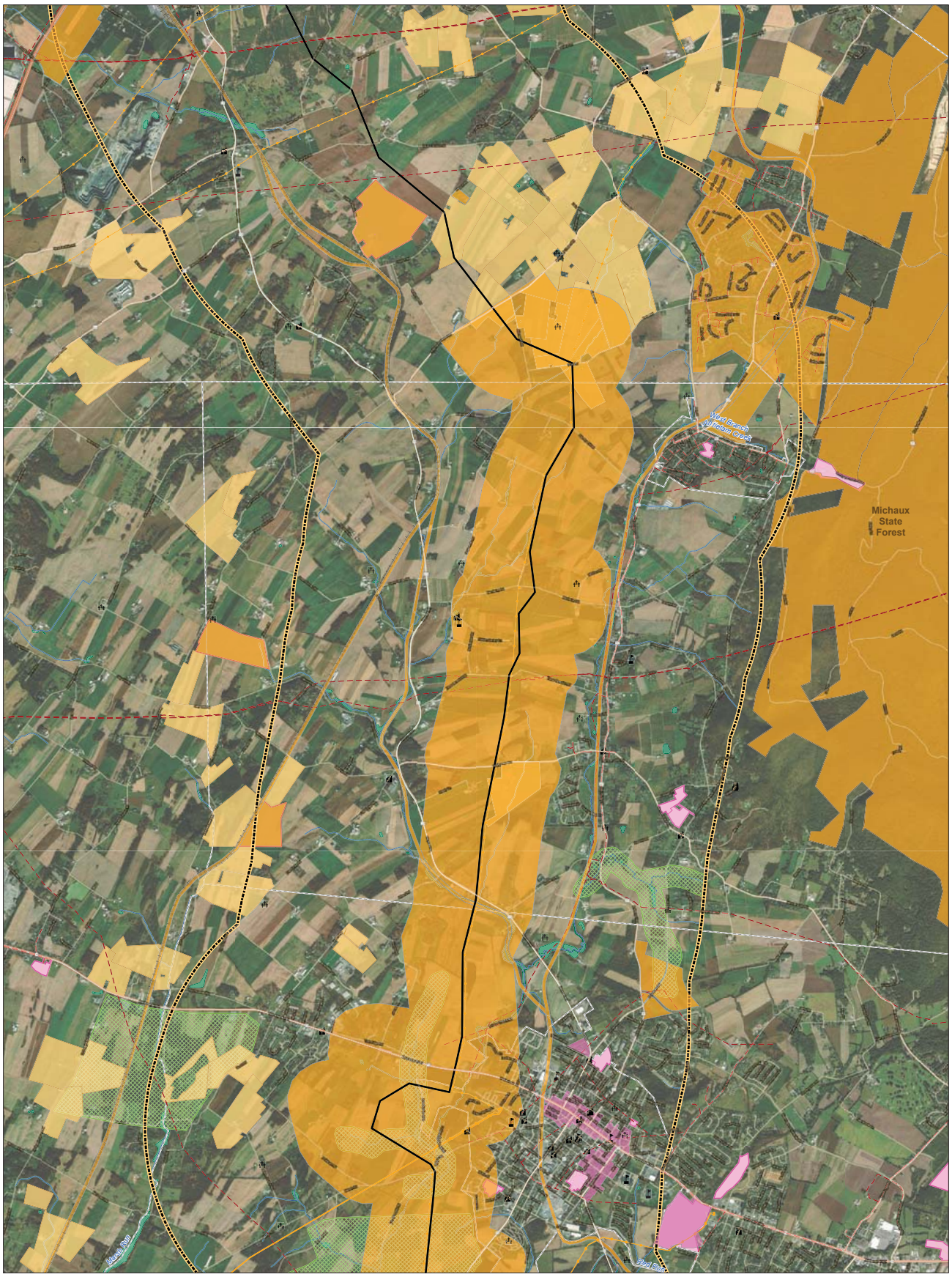
Disclaimer: Due to the sensitivity of archeological resources, their location is considered proprietary and is not included in this figure.

N

0 2,000 4,000 8,000
Feet

Rice - Ringgold 230kV Transmission Line Project Transource, LLC	Job: 60528995 Prepared by: MWC Checked by: HB Date: 5/1/2026

Figure 16
Page 1 of 3
Proposed Route - 2 Mile Overview of Sensitive Features



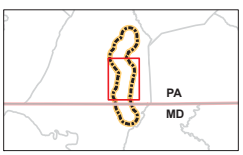
Legend

- Airports
- Schools
- Churches
- Cemeteries
- Proposed Route C
- 2 Mile Buffer
- Existing Transmission Line
- Less than 100 kV
- 115kV - 230 kV
- Greater than 345kV
- Gas Pipeline
- Railroad
- Stream
- NRHP Listed Above Ground Resource
- NRHP Eligible Above Ground Resource
- NRHP Listed Historic District
- NRHP Eligible Historic District
- USDA Agricultural Conservation Easement
- State Agricultural Preservation
- National Park
- Federal Land
- State Land
- Local Park
- PA Core Habitat of Biological Diversity Area
- Wetland

Disclaimer: Due to the sensitivity of archeological resources, their location is considered proprietary and is not included in this figure.

N

0 2,000 4,000 8,000
Feet



Rice - Ringgold 230kV Transmission Line Project Transource, LLC	Job: 60528995 Prepared by: MWC Checked by: HB Date: 5/1/2026	**Figure 16** **Page 2 of 3** **Proposed Route - 2 Mile Overview of Sensitive Features**



Legend

- Airports
- Schools
- Churches
- Cemeteries
- Proposed Route C
- 2 Mile Buffer
- Existing Transmission Line
- Less than 100 kV
- 115kV - 230 kV
- Greater than 345kV
- Gas Pipeline
- Railroad
- Stream
- NRHP Listed Above Ground Resource
- NRHP Eligible Above Ground Resource
- NRHP Listed Historic District
- NRHP Eligible Historic District
- USDA Agricultural Conservation Easement
- State Agricultural Preservation
- National Park
- Federal Land
- State Land
- Local Park
- PA Core Habitat of Biological Diversity Area
- Wetland

Disclaimer: Due to the sensitivity of archeological resources, their location is considered proprietary and is not included in this figure.

N

0 2,000 4,000 8,000
Feet

PA
MD

Rice - Ringgold 230kV Transmission Line Project Transource, LLC	Job: 60528995 Prepared by: MWC Checked by: HB Date: 5/1/2026

Figure 16
Page 3 of 3
Proposed Route - 2 Mile Overview of Sensitive Features

ATTACHMENT 5

ATTACHMENT 5

ENGINEERING DESCRIPTION AND SAFETY PRACTICES

TRANSOURCE

ATTACHMENT 5
ENGINEERING DESCRIPTION AND SAFETY PRACTICES

1.0 INTRODUCTION

Transource Pennsylvania, LLC ("Transource PA") proposes to construct the Pennsylvania portion of the 9A West Project ("9A West Project") in Franklin County, Pennsylvania. This Attachment provides an engineering description of the transmission line associated with the 9A West Project.

2.0 PROPOSED LINE DESIGN

The 9A West Project involves the construction of the new Rice-Ringgold 230 kV Transmission Line that will extend approximately 29 miles, connecting the existing Ringgold Substation located near Smithsburg, Washington County, Maryland, and the new Rice Substation to be located in Franklin County, Pennsylvania. The Pennsylvania portion of the 9A West Project is approximately 24.2 miles as further described in Attachment 4.

The new transmission line associated with the 9A West Project will be designed as a double-circuit 230 kV transmission line. The 230 kV double-circuit design will utilize twelve power conductors, with two conductors being used for each of the six phase positions, and two overhead ground wires. The power conductors will be 795 kcmil[1] 26/7 Aluminum Conductor Steel Supported ("ACSS") "Drake" conductors in each of the six (6) phase conductor positions. The overhead ground wires will provide lightning protection and in some cases communication between circuit breakers that remove the line from service should a fault on the line be detected.

The Pennsylvania portion of the 9A West Project will require the install of approximately 155 steel structures with an average height of 130 feet. The average span length will be approximately 800 feet.

[1] A kcmil is a thousand circular mils. A circular mil is the cross-sectional area of a wire one mil in diameter, where 1 kcmil = 0.5067 mm^2.

The Pennsylvania portion of the new 9A West Project will consist of a combination of tubular steel monopole and multi-pole structures. The tubular steel monopole structures will be used at tangent and light-angle locations. The tubular steel multi-pole structures will be used at medium-angle locations and most of the heavy-angle and deadend locations. The foundation systems will be comprised of drill-shafts.

Diagram 5.1 depicts the typical structures that will be used for the 9A West Project.

3.0 DESIGN CRITERIA AND SAFETY PRACTICES

The 9A West Project will be designed according to all National Electrical Safety Code ("NESC") standards. The NESC is a set of rules to safeguard people during the installation, operation, and maintenance of electric power lines. The NESC contains the basic provisions considered necessary for the safety of employees and the public. Although it is not intended as a design specification, its provisions establish minimum design requirements. Transource PA has developed design specifications and safety rules which meet or surpass all requirements specified by the NESC and the PJM Minimum Design Standards.

The NESC includes loading requirements and clearances for the design, construction, and operation of power lines. The "loads" on conductors and supporting structures are the mechanical forces that develop from the weight of the conductors, the weight of ice on the conductors, plus wind pressure on the conductors and supporting structures. Loading requirements are the loads on the conductors and structures that are anticipated assuming certain ice and wind conditions. Loading requirements contain a combination of strength factors and load factors. These factors account for unknown or unanticipated contingencies in both material variability and structural loading. The clearances and loading requirements contained in the NESC are designed to maintain public safety.

The 9A West Project will be designed to meet or surpass the NESC clearances and loading requirements. For example, the relative order of grades of construction for conductors and supporting structures is B, C, and N; Grade B being the highest. According to the NESC standards, construction Grades B, C, or N may be used for transmission lines (except at crossings of rail road tracks and limited access highways where Grade B construction is specified). Transource PA will design its transmission lines for the 9A West Project as Grade B construction. The use of Grade B design and construction specifies enhancements such as larger-minimum crossarm dimensions and increased safety factors.

In addition to the above considerations, Transource PA utilizes additional loading conditions to account for enhanced structural performance, which results in increased safety performance. A heavy ice loading, including 1 $^{1}/_{4}$" radial ice is included in the design considerations. The design also accounts for longitudinal loading cases, including both a broken phase condition, and an iced/bare wire condition. The longitudinal cases are used by Transource PA to mitigate the possibility for cascading failures. Use of these additional load cases means Transource PA's lines are designed to operate safely and reliably during inclement weather even more severe than assumed by the NESC.

Engineering Clearance Design Criteria and Parameters

The transmission lines for the Project are designed with more clearance to the ground and underlying objects than required by the NESC. The following table contains examples of Transource and NESC clearance comparisons for 230kV lines.

230kV Design Clearance Comparison

Surface Underneath Conductors	Vertical Clearance to Ground NESC Standard	Transource Min. Design
1. Roads, streets, alleys	22.5'	24.5' [2]
2. Other land traversed by vehicles (such as cultivated field, forest, etc.)	22.5'	24.5'
3. Spaces accessible to pedestrians only	18.5'	20.5' [3]
4. Railroad tracks	30.5'	32.5' [4]

Steel Structure Safety Considerations

All steel structures installed on the 9A West Project will be labeled with Danger Signs to discourage public tampering. Additionally, the maintenance climbing systems for the tubular structures will be designed to start at a height well out of reach, typically 12' above ground line. Further, the maintenance climbing systems will be a clipped ladder system known as a McGregor Ladders. The structures will be installed with the ladder clips, but the ladders will not be installed unless needed for future maintenance activities. After maintenance activities are complete, the ladders will be removed. These considerations render the structures virtually unclimbable, and further enhance the safe operation of the line.

Relay Protection Systems

A relay protection system is used to protect the public safety and welfare as well as associated equipment and the transmission system. Relay protection will be installed for all 9A West Project transmission lines to automatically de-energize the line in the unlikely event that the line or supporting structure fails and the line contacts the ground.

[2] In areas where line is designed to accommodate oversized vehicles and equipment (greater than 14'), this clearance is increased by the difference between the known vehicle/equipment heights and 14'.

[3] To ensure safe clearance is accounted for in future land use changes, this clearance is not used for new construction. Minimum clearance design clearance to all surfaces is per item 1.

[4] Coordination during railroad permitting processes may require increasing this clearance depending on rail use.

Periodic Maintenance Program on All Transmission Lines

To ensure continued public safety and integrity of service, a periodic maintenance and inspection program will be implemented for every transmission line. The program will be administered through the use of helicopter patrols, with supplemental foot and structure climbing patrols. A number of helicopter patrols will be performed on all lines annually. During the patrols, the two-man helicopter crew flies parallel, to the left, and above the line so that the observer can look for signs of line damage or deterioration and observe clearances between vegetation and conductors. The observations are included in a report that is forwarded to the appropriate department for corrective action.

Foot and structure climbing patrol programs for a transmission line begin approximately three to five years after the line is energized, unless a helicopter patrol reports a need for earlier action. The frequency of foot patrols varies from once every year to once every several years depending on line type and age.

An assigned foot patroller checks right-of-way conditions, including access roads, bridges, pole washouts, tower footers, vegetation height and clearance to conductors, pole and tower deterioration and, with the use of binoculars, insulators, and condition of hardware. Identified problems are included in a report that is forwarded to the appropriate department for corrective action.

A scheduled line outage is required to perform an overhead patrol because of "hands-on" inspection of hardware. Overhead patrols are conducted on a schedule determined by line age, operating record, and observed general condition. The necessary repairs are also done during the inspection outage.

9A West Project Construction Safety

Safety will be of highest importance during all aspects of the 9A West Project. The construction specifications prepared for the 9A West Project will incorporate AEP experience regarding safety. The 9A West Project will be constructed according to well-defined procedures that utilize standard construction practices to perform all work safely and in compliance with Occupational Safety

and Health Administration ("OSHA") Rules and Regulations, while keeping environmental impact to a minimum. Transource will have dedicated safety personnel on the project, and each contractor will be required to have an adequate safety program in place, monitored by a full-time on-site safety representative.

All work will be done in accordance with NESC, OSHA and any applicable state or federal requirements.

4.0 ELECTRIC AND MAGNETIC FIELD MANAGEMENT

Transource PA applies its magnetic field policies and practices to new transmission line projects. Transource PA does not believe that the current scientific evidence demonstrates that magnetic fields cause any adverse health effects or pose a health or safety danger to the public. Nevertheless, Transource PA has determined, as a matter of policy, to design its new transmission lines to reduce the potential for exposure to magnetic fields when that can be done at low or no cost and consistent with functional requirements. Transource PA's Electric and Magnetic Field Policies and Practices are detailed in Attachment 11.

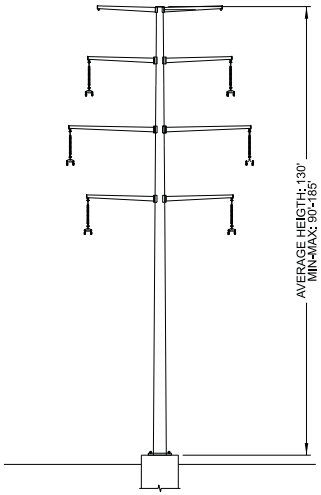
5.0 RIGHT OF WAY REQUIREMENTS

Transource PA's standard right-of-way width for a double circuit 230 kV transmission line is 130 feet, 65 feet either side of the proposed centerline of the transmission line. The right-of-way is determined by the structure type, design tensions, span length, and conductor "blowout" (the distance the wires are moved by a crosswind). The right-of-way for the 9A West Project is planned to be approximately one hundred and thirty feet ("130"') but may vary in certain areas in order to accommodate environmental, engineering, and constructability issues, as well as ensure compliance with the NESC clearances.

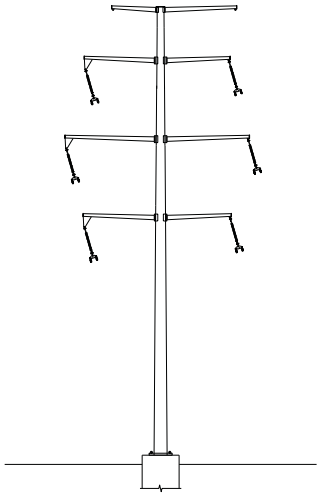
Diagram 5.1

Typical Structures Used for the 9A West Project

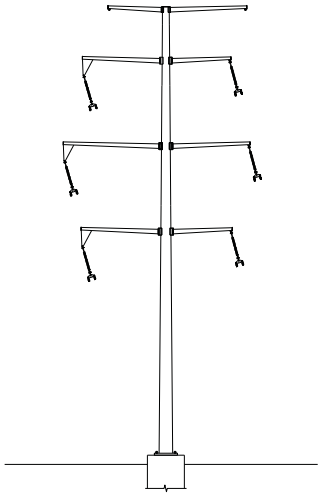
ATTACHMENT 5.1



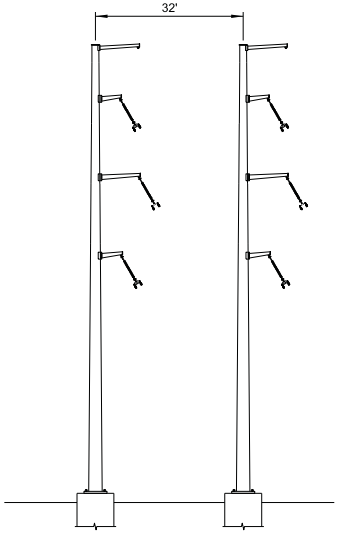
TANGENT (0°-2°)



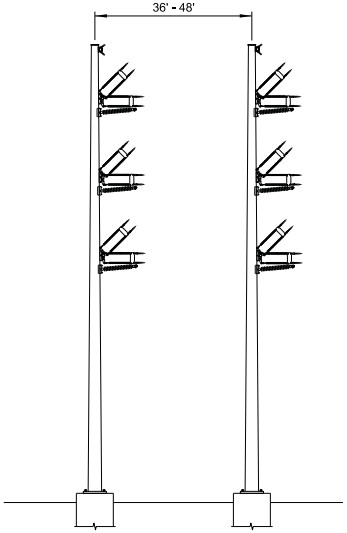
LIGHT ANGLE (2°-6°)



MEDIUM ANGLE (6°-15°)



HEAVY ANGLE (15°-30°)



DEADEND (30°-105°)

no.	date	by	ckd	description

9A WEST PROJECT
ATTACHMENT 4
DIAGRAM 4.1

TRANSOURCE

date	detailed
11/20/19	R. STIMATZE
designed	checked
G.BROWN	J. CLOUSE

9A WEST PROJECT
STRUCTURE FAMILY

BURNS McDONNELL

project	client
92486	TRANSOURCE
drawing	rev.
STRUCTURE FAMILY	— 1
sheet 1 of 1 sheets	
file A	

ATTACHMENT 6

9A West
Attachment 6
Landowner List

Mapbook Page	Parcel	County	State	Owner Name	Mailing Address
14, 13	10-0D09.-102.-000000	Franklin	PA	AUTHORITY GUILFORD WATER	
25, 24	19-0L03.-002A-000000	Franklin	PA	BAKER JONATHAN P & BAKER ROSALIE M	9380 FIVE FORKS RD WAYNESBORO PA 17268
23	10-0D29.-012A-000000	Franklin	PA	BENEDICT DANIEL W & BENEDICT CLARA SUE	4574 ALTENWALD RD WAYNESBORO PA 17268
9	09-0C18.-019.-000000	Franklin	PA	BENEDICT DEREK ETAL	1883 RAGGED EDGE RD CHAMBERSBURG PA 17202
18	10-0D15.-009.-000000	Franklin	PA	BENEDICT IVAN H & BENEDICT RUBY E	3307 COLLEGE DRIVE CHAMBERSBURG PA 17202-9395
29, 30	19-0L12.-010.-000000	Franklin	PA	BIESECKER ROY B & BIESECKER SUSAN L	8410 WAYNE HIGHWAY WAYNESBORO PA 17268
30	19-0L12.-015.-000000	Franklin	PA	BIESECKER ROY B & BIESECKER SUSAN L	8410 WAYNE HIGHWAY WAYNESBORO PA 17268
30, 31	19-0L12.-050B-000000	Franklin	PA	BIESECKER ROY B & BIESECKER SUSAN L	8410 WAYNE HIGHWAY WAYNESBORO PA 17268
23, 24	10-0D30.-001A-000000	Franklin	PA	BRECHBILL BRIAN D & BRECHBILL MICHELLE L	3820 FETTERHOFF CHAPEL RD CHAMBERSBURG PA 17202
41	23-0Q17.-004C-000000	Franklin	PA	BRUCE I JR NEIBERT	14819 WAYNE HIGHWAY WAYNESBORO PA 17268
1	09-0C09.-072.-000000	Franklin	PA	BUCHERT JONATHAN L	217 E BETHESDA RD BARLESON TX 76028
6	09-0C18.-070A-000000	Franklin	PA	BYERS FRED J	1863 COLDSMITH ROAD SHIPPENSBURG PA 17257
41	23-0Q17.-004B-000000	Franklin	PA	CARR ANDREW L & CARR SHERRIE R	14808 WAYNE HIGHWAY WAYNESBORO PA 17268
13	10-0D05.-044.-000000	Franklin	PA	CENTERS LOWE'S HOME	1000 LOWES BLVD MOORESVILLE NC 28117
14	10-0D08.-036C-000000	Franklin	PA	CHAMBERSBURG AREA SCHOOL	511 SOUTH SIXTH STREET CHAMBERSBURG PA 17201
22	10-0D22.-056.-000000	Franklin	PA	CORDELL ROY M & CORDELL EMMA L	4690 FETTERHOFF CHAPEL ROAD CHAMBERSBURG PA 17202
39	23-0Q11.-018.-000000	Franklin	PA	DANIEL J & ESHLEMAN ELAINE J	13868 NORTH HOOVERS MILL ROAD WAYNESBORO PA 17268
39	23-0Q11.-018A-000000	Franklin	PA	DANIEL J & ESHLEMAN ELAINE J	13868 NORTH HOOVERS MILL ROAD WAYNESBORO PA 17268
30, 31, 32	19-0L12.-051.-000000	Franklin	PA	DC FARMS LLC	13689 DREAM HIGHWAY NEWBURG PA 17240
1, 2	09-0C09.-016.-000000	Franklin	PA	DILLER JOSHUA L & DILLER NICOLE M	4913 OLDE SCOTLAND ROAD SHIPPENSBURG PA 17257
2, 3	09-0C09.-017.-000000	Franklin	PA	DILLER ROGER L & DILLER JOYCE E	5505 OLDE SCOTLAND RD SHIPPENSBURG PA 17257
25, 26	19-0L08.-001.-000000	Franklin	PA	EBY MAHLON R & EBY DEBRA S	6685 ANTHONY HIGHWAY WAYNESBORO PA 17268
40	23-0Q17.-002.-000000	Franklin	PA	ESHLEMAN MERLIN D & ESHLEMAN RENEE	14089 NORTH HOOVERS MILL ROAD WAYNESBORO PA 17268
5, 6	09-0C14.-116.-000000	Franklin	PA	ETAL CHAMBERSBURG MALL REALTY LLC	150 GREAT NECK ROAD GREAT NECK NY 11021
5	09-0C14.-137.-000000	Franklin	PA	ETAL CHAMBERSBURG MALL REALTY LLC	150 GREAT NECK ROAD GREAT NECK NY 11021
5, 6	09-0C18.-069A-000000	Franklin	PA	ETAL CHAMBERSBURG MALL REALTY LLC	150 GREAT NECK ROAD GREAT NECK NY 11021
5, 6	09-0C19.-001.-000000	Franklin	PA	ETAL CHAMBERSBURG MALL REALTY LLC	150 GREAT NECK ROAD STE 304 GREAT NECK NY 11021
1	09-0C09.-015.-000000	Franklin	PA	ETTER ALAN O	3670 WHITE CHURCH RD CHAMBERSBURG PA 17202
41	23-0Q17.-084.-000000	Franklin	PA	FAHRNEY LESLIE D	915 PARK ST WAYNESBORO PA 17268
3, 4	09-0C14.-006B-000000	Franklin	PA	FARMS FORRESTER II	3162 WHITE CHURCH ROAD CHAMBERSBURG PA 17202
10	09-0C18.-030.-000000	Franklin	PA	FORRESTER FAMILY FARMS LLC	3162 WHITE CHURCH ROAD CHAMBERSBURG PA 17202
41	23-0Q17.-004E-000000	Franklin	PA	FOX MARY ANN	6977 IRON BRIDGE ROAD WAYNESBORO PA 17268
17, 18	10-0D15.-003.-000000	Franklin	PA	GARBER ROGER A & GARBER MARGARET L	2815 NEWCOMER ROAD CHAMBERSBURG PA 17202
4, 5	09-0C14.-016.-000000	Franklin	PA	GAYMAN KEVIN L & GAYMAN FAYE I	11132 TANYARD HILL RD ORRSTOWN PA 17244
5	09-0C14.-017A-000000	Franklin	PA	GAYMAN KEVIN L & GAYMAN FAYE I	11132 TANYARD HILL RD ORRSTOWN PA 17244
4	09-0C14.-019B-000000	Franklin	PA	GAYMAN KEVIN L & GAYMAN FAYE I	11132 TANYARD HILL RD ORRSTOWN PA 17244
23, 24	10-0D29.-019.-000000	Franklin	PA	GAYMAN MARK E	11742 GEHR RD WAYNESBORO PA 17268
24, 25	19-0L02.-042.-000000	Franklin	PA	GAYMAN MARK E	11742 GEHR RD WAYNESBORO PA 17268
24, 25	19-0L02.-041.-000000	Franklin	PA	GAYMAN MARK E & GAYMAN SALLY A	5460 STAMEY HILL ROAD WAYNESBORO PA 17268
10, 11, 12	10-0D05.-004.-000000	Franklin	PA	GBR LINCOLN HIGHWAY LIMITED	150 WHITE PLAINS ROAD TARRYTOWN NY 10591
12	10-0D05.-004.-AB0000	Franklin	PA	GBR LINCOLN HIGHWAY LIMITED	150 WHITE PLAINS ROAD TARRYTOWN NY 10591
27	19-0L07.-092.-000000	Franklin	PA	HESS HARLAN D & HESS CARRIE E	8200 HELMAN ROAD WAYNESBORO PA 17268
34, 35, 36	23-0Q06.-023.-000000	Franklin	PA	HORST ALBERT L & HORST BRENDA K	5967 TICK RIDGE RD WAYNESBORO PA 17268
19	10-0D15.-037.-000000	Franklin	PA	HORST IVAN D & HORST ELLEN M	2637 SOLLENBERGER DRIVE CHAMBERSBURG PA 17202
43, 44	10-0D15.-038.-000000	Franklin	PA	HOSTETTER JASON M & HOSTETTER ROSALIE J	2048 GUILFORD STATION ROAD CHAMBERSBURG PA 17202
4	09-0C14.-019.-000000	Franklin	PA	IESI PA BLUE RIDGE LANDFILL	PO BOX 399 SCOTLAND PA 17254
41	23-0Q17.-072.-000000	Franklin	PA	JACK E ETAL MARTIN	12574 POLKTOWN ROAD WAYNESBORO PA 17268

9A West
Attachment 6
Landowner List

Mapbook Page	Parcel	County	State	Owner Name	Mailing Address
34, 35	23-0Q06.-021.-000000	Franklin	PA	JOHN E N BLAIR	11611 PRICES CHURCH RD WAYNESBORO PA 17268
42	23-0Q17.-016.-000000	Franklin	PA	JONES SAMUEL A & JONES MANDY L	7583 LYONS ROAD WAYNESBORO PA 17268
2, 3	09-0C14.-001.-000000	Franklin	PA	KAUFFMAN AARON L	4220 OLDE SCOTLAND ROAD CHAMBERSBURG PA 17202
3	09-0C14.-006.-000000	Franklin	PA	KAUFFMAN AARON L	4220 OLDE SCOTLAND ROAD CHAMBERSBURG PA 17202
7, 8, 9	09-0C18.-015.-000000	Franklin	PA	KEITH H ETAL BENEDICT	3865 HENRY RD CHAMBERSBURG PA 17202
7	09-0C18.-063.-000000	Franklin	PA	LEMMA & O'CONNOR INVESTORS LLC	3272 ST ANDREWS DR CHAMBERSBURG PA 17202
14, 15	10-0D08.-133.-000000	Franklin	PA	LESHER RICHARD L & LESHER AGNES M	1126 CIDER PRESS ROAD CHAMBERSBURG PA 17202
32, 33	19-0L17.-019A-000000	Franklin	PA	LONG DANIEL S	6405 NUNNERY ROAD WAYNESBORO PA 17268
33, 34	23-0Q02.-016.-000000	Franklin	PA	LONG DANIEL S	6405 NUNNERY ROAD WAYNESBORO PA 17268
36, 37	23-0Q06.-016.-000000	Franklin	PA	MARTIN DENVER N & MARTIN KATRINA J	6973 NUNNERY ROAD WAYNESBORO PA 17268
12, 13	10-0D09.-001C-000000	Franklin	PA	MARTIN DONALD L & MARTIN DENISE M	1946 NEWCOMER RD CHAMBERSBURG PA 17202
17, 18	10-0D15.-011.-000000	Franklin	PA	MARTIN DONALD L & MARTIN DENISE M	1946 NEWCOMER ROAD CHAMBERSBURG PA 17202
23	10-0D22.-065.-000000	Franklin	PA	MARTIN DONALD L & MARTIN DENISE M	1946 NEWCOMER ROAD CHAMBERSBURG PA 17202
23, 24	10-0D23.-006.-000000	Franklin	PA	MARTIN DONALD L & MARTIN DENISE M	1946 NEWCOMER ROAD CHAMBERSBURG PA 17202
38	23-0Q11.-003.-000000	Franklin	PA	MARTIN JACK E & MARTIN EMILY L	12574 POLKTOWN ROAD WAYNESBORO PA 17268
37, 38	23-0Q11.-003B-000000	Franklin	PA	MARTIN JACK E & MARTIN EMILY L	12574 POLKTOWN ROAD WAYNESBORO PA 17268
40, 41	23-0Q17.-003.-000000	Franklin	PA	MARTIN LAVERNE & MARTIN ELLEN	14578 WAYNE HIGHWAY WAYNESBORO PA 17268
28, 29	19-0L07.-053.-000000	Franklin	PA	MARTIN MARLIN L & MARTIN CARRIE R	8686 PLEASANT RIDGE ROAD HARRISONVILLE PA 17228
31, 32	19-0L12.-049.-000000	Franklin	PA	MARTIN ROY S & MARTIN REGINA F	4913 SHADY LANE WAYNESBORO PA 17268
27, 28	19-0L07.-054.-000000	Franklin	PA	MARTIN STEPHEN L & MARTIN ESTHER N	6000 MANHEIM RD WAYNESBORO PA 17268
31, 32	19-0L17.-016A-000000	Franklin	PA	MELLOTT CHARLES W	9702 WAYNE HIGHWAY WAYNESBORO PA 17268
27	19-0L07.-038.-000000	Franklin	PA	MEYER RODNEY A	5413 MANHEIM ROAD WAYNESBORO PA 17268
42	23-0Q17.-035C-000000	Franklin	PA	MILLER MYRON J & MILLER FERN L	9180 GOODS DAM ROAD WAYNESBORO PA 17268
1	09-0C09.-012.-000000	Franklin	PA	MILTON E & STACEY R ROTZ (Rice Substation Site)	0 PINE STUMP ROAD CHAMBERSBURG PA 17202
27	19-0L07.-050C-000000	Franklin	PA	MORGAN ROBERT T & MORGAN JUDITH A	5516 MANHEIM ROAD WAYNESBORO PA 17268
10	09-0C18.-029.-000000	Franklin	PA	MOWER JOEL R	683 MOWER ROAD CHAMBERSBURG PA 17202-8154
10, 11	10-0D05.-051A-000000	Franklin	PA	MOWER JOEL R	683 MOWER ROAD CHAMBERSBURG PA 17202
17	10-0D15.-002.-000000	Franklin	PA	NITTERHOUSE COLBY S & NITTERHOUSE LEAH A	2479 NEWCOMER RD CHAMBERSBURG PA 17202
39	23-0Q11.-019.-000000	Franklin	PA	NORMAN J & DILLER BONNA J	20660 MILLERS CHURCH ROAD HAGERSTOWN MD 21742
29, 30	19-0L12.-053.-EX0000	Franklin	PA	ORPHANAGE BRETHREN UNITED	ORPHANAGE ROAD WAYNESBORO PA 17268
38	23-0Q11.-017.-000000	Franklin	PA	OWLS CLUB INCORPORATED	87 WEST MAIN STREET WAYNESBORO PA 17268
12	10-0D05.-044A-000000	Franklin	PA	PATRIOT FEDERAL CREDIT UNION	800 WAYNE AVENUE CHAMBERSBURG PA 17201
6, 7	09-0C18.-060A-000000	Franklin	PA	REIFF ELAM H & REIFF MARY Z	275 GOODHART RD SHIPPENSBURG PA 17257
14, 15, 16	10-0D08.-057.-000000	Franklin	PA	RICE ALLEN W & RICE LORI C	1430 HENRY LANE CHAMBERSBURG PA 17202
20, 21	10-0D22.-069.-000000	Franklin	PA	RICE FRED E & RICE DOREEN K	3210 CHURCH RD CHAMBERSBURG PA 17202
6	09-0C18.-068.-000000	Franklin	PA	ROTZ EDWARD & ROTZ MARLIN	205 MT UNION RD FAYETTEVILLE PA 17222
26, 27	19-0L07.-038A-000000	Franklin	PA	RUDOLPH JOHN V & RUDOLPH EUNICE JR	7270 BUTTERMILK ROAD WAYNESBORO PA 17268
27	19-0L07.-047A-000000	Franklin	PA	RUDOLPH LAMAR V & RUDOLPH EDNA F	5401 MANHEIM RD WAYNESBORO PA 17268
42	23-0Q17.-034.-000000	Franklin	PA	SCHINDEL KYLE F & SCHINDEL KELLY A	22032 ROCKY FORGE ROAD HAGERSTOWN MD 21740
15	10-0D08.-037.-000000	Franklin	PA	SMITH PROPERTIES LP	PO BOX 2013 CHAMBERSBURG PA 17202
14	10-0D08.-043.-000000	Franklin	PA	SMITH PROPERTIES LP	PO BOX 2013 CHAMBERSBURG PA 17201
28, 29	19-0L12.-010A-000000	Franklin	PA	STEIGER JOHN A & STEIGER ALLISON E	5465 HESS BENEDICT ROAD WAYNESBORO PA 17268
14	10-0D08.-036.-000000	Franklin	PA	STINE ALLEN A	867 CIDER PRESS ROAD CHAMBERSBURG PA 17202
37	23-0Q11.-002.-000000	Franklin	PA	STONER RONALD P & STONER DORIS M	12477 COLD SPRINGS RD WAYNESBORO PA 17268
23	10-0D29.-015.-000000	Franklin	PA	STRITE DANIEL R & STRITE DOREEN F	6032 BUTTERMILK RD WAYNESBORO PA 17268
25, 26	19-0L02.-040.-000000	Franklin	PA	STRITE DANIEL R & STRITE DOREEN F	6032 BUTTERMILK ROAD WAYNESBORO PA 17268
26	19-0L07.-036.-000000	Franklin	PA	STRITE DANIEL R & STRITE DOREEN F	6032 BUTTERMILK ROAD WAYNESBORO PA 17268

9A West
Attachment 6
Landowner List

Mapbook Page	Parcel	County	State	Owner Name	Mailing Address
41, 42	23-0Q17.-019.-000000	Franklin	PA	TIJANI TUNDE T	503 BROOKVIEW DRIVE GREENCASTLE PA 17225
36	23-0Q06.-026.-000000	Franklin	PA	TRADEMARK DEVELOPMENT CORP	9932 MENTZER GAP ROAD WAYNESBORO PA 17268
38	23-0Q11.-057.-000000	Franklin	PA	WEAGLEY JOSEPH N	6413 MARSH ROAD WAYNESBORO PA 17268
15, 16	10-0D08.-058.-000000	Franklin	PA	WENGER NEVIN P & WENGER RAEDELLA A	2249 NEWCOMER ROAD CHAMBERSBURG PA 17202
10	09-0C18.-098.-000000	Franklin	PA	WEST PENN POWER COMPANY (First Energy)	
8, 9 , 10	09-0C18.-005.-000000	Franklin	PA	WHITE LOIS M	1406 WALKER ROAD CHAMBERSBURG PA 17202
8	09-0C18.-011.-000000	Franklin	PA	WILDESON KAREN S	2778 MONT ALTO ROAD CHAMBERSBURG PA 17202
16, 17	10-0D14.-019.-000000	Franklin	PA	WILLIS M LESHER PARTNERSHIP	1153 SWAMP FOX ROAD CHAMBERSBURG PA 17202
19, 20	10-0D22.-012.-000000	Franklin	PA	WILLIS M LESHER PARTNERSHIP	1153 SWAMP FOX ROAD CHAMBERSBURG PA 17202
21, 22	10-0D22.-024.-000000	Franklin	PA	WILLIS M LESHER PARTNERSHIP	1153 SWAMP FOX ROAD CHAMBERSBURG PA 17202
22, 23	10-0D29.-011.-000000	Franklin	PA	WILLIS M LESHER PARTNERSHIP	1153 SWAMP FOX ROAD CHAMBERSBURG PA 17202
9, 10	09-0C18.-121.-000000	Franklin	PA	WINGERT MARLIN & WINGERT MARILYN	1550 WALKER ROAD CHAMBERSBURG PA 17202
36	26-5A00.-004B-000000	Franklin	PA	ZAIGER JANE M	10329 WAYNE HIGHWAY WAYNESBORO PA 17268
41	23-0Q17.-043.-000000	Franklin	PA	ZEIGLER GERALD L & ZEIGLER JENNIFER S	14924 WAYNE HWY WAYNESBORO PA 17268
47	14000224	Washington	MD	BAKER PAUL A	22622 GARDENHOUR RD SMITHSBURG MD 21783
49, 50	07015593	Washington	MD	BROCROFT KENNELS LTD	12936 BRADBURY AVE SMITHSBURG MD 21783
44	09004629	Washington	MD	COOK CLARENCE W JR	22236 RINGGOLD PIKE HAGERSTOWN MD 21742
47	14000011	Washington	MD	FRUSHOUR BOYD E JR	22614 GARDENHOUR RD SMITHSBURG MD 21783
47, 48	07016956	Washington	MD	GARDENHOUR G WILLIAM III	22511 GARDENHOUR RD SMITHSBURG MD 21783
47, 48	07005237	Washington	MD	GARDENHOUR ORCHARDS INC	PO BOX 275 SMITHSBURG MD 21783
49	07001576	Washington	MD	GROVE RICHARD LEE	13001 ROWE RD SMITHSBURG MD 21783
45, 46	09005323	Washington	MD	HOSTETTER LEROY M	22001 GROVE RD HAGERSTOWN MD 21742
46, 47	14013822	Washington	MD	HUNTER SAMUEL C	13651 NEWCOMER RD HAGERSTOWN MD 21742
50	07000812	Washington	MD	MACE JAMES P	12908 BIKLE RD SMITHSBURG MD 21783
47	14006052	Washington	MD	MARTIN JOHN S &	22632 GARDENHOUR RD SMITHSBURG MD 21783
44, 45	09006087	Washington	MD	MESSLER LOUIS E	22235 RINGGOLD PIKE HAGERSTOWN MD 21742
45, 46	14006974	Washington	MD	NEWCOMER RICHARD A	13811 POPLAR GROVE RD HAGERSTOWN MD 21742
45, 46	14006982	Washington	MD	NEWCOMER RICHARD A	13811 POPLAR GROVE RD HAGERSTOWN MD 21742
50	07024967	Washington	MD	POTOMAC EDISON CO (First Energy)	TAX DEPT 800 CABIN HILL DR GREENSBURG PA 15601
50	07024975	Washington	MD	POTOMAC EDISON CO (First Energy)	TAX DEPT 800 CABIN HILL DR GREENSBURG PA 15601
42, 43	09011072	Washington	MD	SCHINDEL KYLE F	22032 ROCKY FORGE RD HAGERSTOWN MD 21742
43, 44	09014039	Washington	MD	SCHINDEL KYLE F	22032 ROCKY FORGE RD HAGERSTOWN MD 21742
48, 49	07015429	Washington	MD	STRITE FAMILY ENTERPRISES	21640 LEITERSBRG SMITHSBRG RD HAGERSTOWN MD 21742
48, 49	07019521	Washington	MD	STRITE FAMILY ENTERPRISES	21640 LEITERSBRG SMITHSBRG RD HAGERSTOWN MD 21742
49	07003080	Washington	MD	WINTERS ANNE C	2934 HAMAKER LANE SMITHSBURG MD 21783

ATTACHMENT 7

9A WEST PROJECT
ATTACHMENT 7
PRELIMINARY PERMIT MATRIX

Permit Jurisdiction	Status	Name of Permit, Approval, Review, License Type	Office/Agency Issuing Permit/ Approval/ Review	Review, Approval or Permit	Notes (When required)	Application Requirements	Estimated Application Submittal Date	Actual Application Submittal Date	Estimated Permit Issuance Date	Actual Permit Issuance Date
Federal										
Federal	Complete	Consultations under Section 7 of the Endangered Species Act PA - Pennsylvania Natural Diversity Inventory (PNDI) Coordination Review	U.S. Fish and Wildlife Service (USFWS), Northeast Region (State College, PA, and Chesapeake Bay, MD field office)	Concurrence	Requires agency consultation if Section 404 permit required or if there is potential to impact federally listed species or their habitat. For PA, required through the PNDI process, USFWS will be contacted to provide information on threatened and endangered (T&E) species that may be within the project area.	- PNDI Results - Habitat Assessment - Species Specific Habitat Report - Potential impacts	NA	2/25/2027	10/31/2018	7/8/2025
Federal	In Progress	Consultations under Section 7 of the Endangered Species Act MD - Standalone consultation		Concurrence	Requires agency consultation if Section 404 permit required or if there is potential to impact federally listed species or their habitat. Can be completed initially by conducting a USFWS Information for Planning and Conservation (IPaC) review online or via letter to the USFWS Field Office at Chesapeake Bay, MD.	- PNDI Results - Habitat Assessment - Species Specific Habitat Report - Potential impacts	6/1/2026	TBD	7/10/2026	TBD
Federal	Complete	FAA Notification (FAA Form 7460-1)	Federal Aviation Administration (FAA)	Notice of Proposed Construction	Must notify the FAA if structures will exceed 200 feet in height or if the structures are located within the distance to height ratio from the nearest point of the nearest FAA designated airport runway, including temporary use of cranes.	- Structure Heights and Elevations - Structure locations - Completion of Form 7460-1 (for each notice requirement)	NA	1/15/2025	NA	2/12/2025
Pennsylvania - State										
State	In Progress	Certificate of Public Convenience and Necessity (CPCN)	Pennsylvania Public Utility Commission (PAPUC)	Certificate	CPCN is authorized through the PAPUC in keeping with the requirements of 52 Pa. Code 57.72 for the siting and licensing of electric transmission lines.	- Routing Study - PUC Application & Exhibits - Waivers/Exemption requests	5/15/2026	TBD	10/16/2026	TBD
State	Not Started	PADEP JPA or GPs Wetlands and Water Obstructions (Chapter 105)	PADEP Bureau of Waterways Engineering and Wetlands (Southwest Regional Office)	Permit	PADEP permits are required for activities in, along, or across watercourses, floodways, or bodies of water (incl. wetlands). At this time, it is hoped that General Permits and waivers may be applicable for this project, to avoid a Joint Permit Application, but this will depend on final pole locations and access road impacts.	- Chp 105 App. or JPA - Wetland Delineation - Temporary and Permanent Wetland/Stream Impact Summary - Mitigation Evaluation	4/27/2027	TBD	9/26/2027	TBD
State	Not Started	Floodplain Permit (Chapter 106)	PADEP Bureau of Waterways Engineering and Wetlands (Southwest Regional Office)	Permit	PADEP floodplain permits are required for activities in, along, or across watercourses, floodways, or bodies of water (incl. wetlands).	- Chp 105/106 App. - Permanent/Temp. Floodplain Assessment - Location and Plan figures	4/27/2027	TBD	9/26/2027	TBD
State	Not Started	NPDES Permit and Post-Construction Stormwater Review (Chapter 102)	PADEP Bureau of Waterways Engineering and Wetlands (Southwest Regional Office)	Notice/Permit	A permit and Erosion and Sediment (E&S) Control Plan are required when construction activities will include earth disturbances greater than or equal to one acre. An E&S Control Plan and Individual NPDES Permit will be required for the project. The process will require a review by the local County Conservation District (CCD) and approval by PADEP.	- Notice of Intent (NOI)/App. - Stormwater Mgmt Study - Stormwater calculations - E&S Control plan text and detailed figures	11/20/2026	TBD	7/26/2027	TBD
State	Complete	Submerged Lands License Agreement (SLLA)	PADEP Bureau of Waterways Engineering and Wetlands (Southwest Regional Office)	License/ Agreement	Projects that cross over/under a state-designated navigable waterway requires a SLLA with the PA DEP.	- SLLA Form/App. - Location figure - Plan and Profiles Figure	NA	6/9/2020	NA	12/28/2020
State	Complete	Pennsylvania Natural Diversity Inventory (PNDI) Review - Pennsylvania Fish and Boat Commission (PFBC)	Pennsylvania Fish and Boat Commission (PFBC)	Concurrence	As required through the PNDI process, PFBC may need to be contacted to provide information on threatened and endangered (T&E) species that may be within the project area.	- PNDI Results - Habitat Assessment - Species Specific Habitat Report - Potential impacts	NA	2/25/2025	NA	4/23/2026
State	Complete	Pennsylvania Natural Diversity Inventory (PNDI) Review - Pennsylvania Game Commission (PGC)	Pennsylvania Game Commission (PGC)	Concurrence	As required through the PNDI process, PGC will be contacted to provide information on T&E species that may be within the project area.	- PNDI Results - Habitat Assessment - Species Specific Habitat Report - Potential impacts	NA	2/25/2025	NA	2/26/2025
State	Complete	Pennsylvania Natural Diversity Inventory (PNDI) Review- Pennsylvania Department of Conservation and Natural Resources (DCNR)	Pennsylvania Department of Conservation and Natural Resources (DCNR)	Concurrence	As required through the PNDI process, DCNR will be contacted to provide information on T&E species that may be within the project area.	- PNDI Results - Habitat Assessment - Species Specific Habitat Report - Potential impacts	NA	2/25/2025	NA	2/26/2025

9A WEST PROJECT
ATTACHMENT 7
PRELIMINARY PERMIT MATRIX

Permit Jurisdiction	Status	Name of Permit, Approval, Review, License Type	Office/Agency Issuing Permit/ Approval/ Review	Review, Approval or Permit	Notes (When required)	Application Requirements	Estimated Application Submittal Date	Actual Application Submittal Date	Estimated Permit Issuance Date	Actual Permit Issuance Date
State	Complete	Cultural Resources Consultation under Section 106 of the NHPA or State Law PHMC Cultural Resources Consultation	Pennsylvania Historical and Museum Commission (PHMC)	Clearance	A PHMC review of the potential cultural resources in the project area will be required due to the level of earth disturbance and potential for Section 106 NHPA compliance. PHMC and Transource entered into an Memo Of Understanding (MOU).	- Background review - Field Survey - Background and Field Survey Report - Summary of Historic Properties Affected - Photos and Figures	NA	Various	NA	Archaeological Clearance 1/30/2019 MOU extension 4/5/2024
State	Not Started	PennDOT I-81 Highway Occupancy Permit (HOP) Permits	Pennsylvania Department of Transportation (PennDOT)	Permit	May require coordination with PennDOT for state roadways. Nonlimited access roadways may not require crossing permits.	- Applications - Location Figures - Plan and Profile figures - Online Submittal/Reg. Certification	12/11/2026	TBD	2/3/2027	TBD
Pennsylvania - Local										
Local	Not Started	Chapter 102 E&S Plan	Franklin County Conservation District (CCD)	Notice/Permit and Approval	An approved E&S Plan and an Individual NPDES Permit (instead of a General Permit) are required for this project due to high quality or exceptional value waters being crossed by the project.	- Notice of Intent (NOI)/App. - Stormwater Mgmt Study - Stormwater calculations - E&S Control plan text and detailed figures	11/20/2026	TBD	7/26/2027	TBD
Maryland - State										
State	In Progress	Certificate of Public Convenience and Necessity (CPCN)	Maryland Power Plant Research Program (PPRP) (Maryland Department of Natural Resources – MD DNR)	Review/ Approval/ Authorization	CPCN must be obtained from the Maryland Public Service Commission (PSC). The Power Plant Siting Act of 1971, augmented by the Electric Utility Industry Restructuring Act of 1999, provides for a consolidated review of CPCN applications in Maryland.	- Routing Study - CPCN Application & Exhibits - Waivers/Exemption requests	NA	NA	NA	6/30/2020
State	Not Started	NPDES General Permit for Stormwater Associated with Construction Activity	MDE	Notice/ Permit	File Notice of Intent (NOI). Must first submit an erosion and sediment control plan to the appropriate approval authority (e.g., the local soil conservation district). Required for soil disturbance of one acre or more. Coverage under this General Permit should be pursued unless MDE advises an individual permit is necessary. (Also, citizens can review the NOI during the public notification period and request that an individual permit be required.)	- Notice of Intent (NOI)/App. - Stormwater Mgmt Study - Stormwater calculations - E&S Control plan text and detailed figures	7/26/2027	TBD	9/26/2027	TBD
State	Complete	Consultation for Cultural Resources - Section 106 of the NHPA or State Law	Maryland Department of Planning, Maryland Historical Trust (MDSHPO)	Clearance	Serves as the SHPO in Maryland. Required for any activity that receives federal funding or approval, or requires a federal permit or license.	- Background review - Field Survey - Background and Field Survey Report - Summary of Historic Properties Affected - Photos and Figures	NA	Various	NA	7/27/2018 1/22/2020 for realignment
State	Complete	Maryland Natural Heritage Program Consultation for State-Listed Species	MD DNR, Wildlife and Heritage Section	Concurrence	Environmental review for rare, threatened and endangered species, unique natural communities, and other significant natural resources.	- Request Letter - Habitat Assessment - Species Specific Habitat Report - Potential impacts	NA	12/18/20218	NA	1/8/2019
State	Complete	Highway Occupancy Permits (HOP)	Maryland State Highway Administration (MSHA)	Permit	Coordination with the MSHA will be required for access, lane closure, utility, and other permits needed that may impact Maryland roadways. Most public roadways in Maryland are either State or County owned/maintained.	- Applications - Location Figures - Plan and Profile figures	NA	8/9/2025	NA	8/12/2025
State	Not Started	Highway Access Permits (HAP)	MSHA	Permit	Coordination with the MSHA will be required for access off of a state highway.	- Applications - Location Figures - Access Plans	2/1/2019	TBD	5/1/2019	TBD
Maryland - Local										
Local	In Progress	Erosion/Sediment Control and Stormwater Management Plan Approval	Washington County Soil Conservation Districts (SCD)	Review/ Approval	Plans must meet state soil erosion and sediment control standards and specifications.	- SWP3/E&S Control plan text and figures	NA	Various	NA	Approved, 4/6/2021 pending PE signature and purchase of forest mitigation credits.

9A WEST PROJECT
ATTACHMENT 7
PRELIMINARY PERMIT MATRIX

Permit Jurisdiction	Status	Name of Permit, Approval, Review, License Type	Office/Agency Issuing Permit/ Approval/ Review	Review, Approval or Permit	Notes (When required)	Application Requirements	Estimated Application Submittal Date	Actual Application Submittal Date	Estimated Permit Issuance Date	Actual Permit Issuance Date
State	In Progress	Development of a Forest Stand Delineation and Forest Conservation Plan	Washington County Planning and Zoning	Review/ Approval	Reviewed and approved with the Soil Erosion and Sedimentation Plan.	- Request Letter/Agreement - Forest Impact Summary -Forest Mitigation Plan	NA	Various	NA	Approved 4/6/2021, pending purchase of forest mitigation credits and plat.

ATTACHMENT 8

ATTACHMENT 8
LIST OF GOVERNMENTAL AGENCIES, MUNICIPALITIES AND OTHER PUBLIC ENTITIES RECEIVING THE APPLICATION

RECIPIENTS OF FULL SITING APPLICATION

State Agencies

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

Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1925

Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
P.O. Box 3265
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105-3265

Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101

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

County Agencies

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

Municipalities

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

Guilford Township
115 Spring Valley Road
Chambersburg, PA 17202
Contact: Don Clapper, Chairman

Quincy Township
7575 Mentzer Gap Road
Waynesboro, PA 17268
Contact: Alan Peck, Supervisor

Borough of Waynesboro
55 E. Main Street
Waynesboro, PA 17268
Contact: Jason Stains, Borough Manager

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

Public Utilities

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.
5400 Westheimer Court
Houston, TX 77056

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

Dominion Energy
5000 Dominion Boulevard
Glen Allen, VA 23060

NOTICE OF FILING RECIPIENTS

Federal Agencies

U.S. Army Corps of Engineers
Baltimore District-(Pennsylvania Section)
Regulatory Branch
1631 South Atherton Street
Suite 101
State College, PA 16801-6260
Contact: Wade Chandler, Chief Pennsylvania Section

U.S. Fish and Wildlife Service
PA Field Office Northeast Region
110 Radnor Road, Suite 101
State College, PA 16801
Contact: Jodie Mamuscia, Field Office Supervisor

U.S. Environmental Protection Agency – Region 3
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2029
Contact: Amy Van Blarcom-Lackey, Regional Administrator

State Agencies

Pennsylvania Department of Transportation
Keystone Building
400 North Street., Fifth Floor
Harrisburg PA 17120
Contact: Mike Carroll, Secretary of Transportation

Pennsylvania Department of Conservation and Natural Resources
400 Market Street, 6th floor
Rachel Carson State Office Building
Harrisburg, PA 17105
Contact: Seth Cassell, State Forester

Pennsylvania Department of Environmental Protection
Southcentral Regional Office
909 Elmerton Avenue
Harrisburg, PA 17110
Contact: Robert DiGilarmo, Regional Director

Pennsylvania Fish and Boat Commission
1601 Elmerton Avenue
Harrisburg, PA 17106
Contact: Timothy D. Schaeffer, Executive Director

Pennsylvania Game Commission
8627 William Penn Highway
Southcentral Region
Huntingdon, PA 16652
Contact: Seth Mesoras, Director

Pennsylvania Department of Agriculture
2301 North Cameron Street
Region 6, Room 403
Harrisburg, PA 17110
Contact: Russell Redding, Secretary of Agriculture

Pennsylvania Historical & Museum Commission
400 North Street, 2nd floor
Commonwealth Keystone Building
Harrisburg, PA 17120
Contact: Andrea L. MacDonald, Bureau Director

Landowners

Milton E. Rotz
Stacey R. Rotz
0 Pine Stump Road
Chambersburg, PA 17202

Jonathan L. Buchert
217 E. Bethesda Road
Barleson, TX 76028

Alan O. Etter
3670 White Church Road
Chambersburg, PA 17202

Joshua L. Diller
Nicole M. Diller
4913 Olde Scotland Road
Shippensburg, PA 17257

Roger L. Diller
Joyce E. Diller
5505 Olde Scotland Road
Shippensburg, PA 17257

Aaron Kauffman
4220 Olde Scotland Road
Chambersburg, PA 17202

Forrester Farms II
3162 White Church Road
Chambersburg, PA 17202

IESI PA Blue Ridge Landfill
P.O. Box 399
Scotland, PA 17254

Kevin L. Gayman
Faye I. Gayman
11132 Tanyard Hill Road
Orrstown, PA 17244

Chambersburg Mall Realty LLC, et al
150 Great Neck Road
Great Neck, NY 11021

Edward Rotz
Marlin Rotz
205 Mt. Union Road
Fayetteville, PA 17222

Fred J. Byers
1863 Coldsmith Road
Shippensburg, PA 17257

Elam H. Reiff
Mary Z. Reiff
275 Goodhart Road
Shippensburg, PA 17257

Lemma & O'Connor Investors LLC
3272 St. Andrews Drive
Chambersburg, PA 17202

Keith H. Benedict, et al
3865 Henry Road
Chambersburg, PA 17202

Karen S. Wildeson
2778 Mont Alto Road
Chambersburg, PA 17202

Lois M. White
1406 Walker Road
Chambersburg, PA 17202

Derek Benedict et al
1883 Ragged Edge Rd
Chambersburg, PA 17202

Marlin Wingert
Marilyn Wingert
1550 Walker Road
Chambersburg, PA 17202

Joel R. Mower
683 Mower Road
Chambersburg, PA 17202

Forrester Family Farms LLC
3162 White Church Road
Chambersburg, PA 17202

GBR Lincoln Highway Limited
150 White Plains Road
Tarrytown, NY 10591

Patriot Federal Credit Union
800 Wayne Avenue
Chambersburg, PA 17202

Lowe's Home Centers
1000 Lowes Boulevard
Mooresville, NC 28117

Donald L. Martin
Denise M. Martin
1946 Newcomer Road
Chambersburg, PA 17202

Guilford Water Authority
115 Spring Valley Road
Chambersburg, PA 17202

Chambersburg Area School District
511 South Sixth Street
Chambersburg, PA 17201

Allen A. Stine
867 Cider Press Road
Chambersburg, PA 17202

Smith Properties
P.O. Box 2013
Chambersburg, PA 17202

Richard L. Lesher
Agnes M. Lesher
1126 Cider Press Road
Chambersburg, PA 17202

Allen W. Rice
Lori C. Rice
1430 Henry Lane
Chambersburg, PA 17202

Nevin P. Wenger
Raedella A. Wenger
2249 Newcomer Road
Chambersburg, PA 17202

Willis M. Lesher Partnership
1153 Swamp Fox Road
Chambersburg, PA 17202

Colby S. Nitterhouse
Leah A. Nitterhouse
2479 Newcomer Road
Chambersburg, PA 17202

Roger A. Garber
Margaret L. Garber
2815 Newcomer Road
Chambersburg, PA 17202

Donald L. Martin
Denise M. Martin
1946 Newcomer Road
Chambersburg, PA 17202

Ivan H. Benedict
Ruby E. Benedict
3307 College Drive
Chambersburg, PA 17202

Ivan D. Horst
Ellen M. Horst
2637 Sollenberger Drive
Chambersburg, PA 17202

Jason M. Hostetter
Rosalie J. Hostetter
2048 Guilford Station Rd
Chambersburg, PA 17202

Fred E. Rice
Doreen K. Rice
3210 Church Road
Chambersburg, PA 17202

Roy M. Cordell
Emma L. Cordell
4690 Fetterhoff Chapel Rd
Chambersburg, PA 17202

Daniel W. Benedict
Clara Sue Benedict
4574 Altenwald Road
Waynesboro, PA 17268

Daniel R. Strite
Doreen F. Strite
6032 Buttermilk Road
Waynesboro, PA 17268

Donald L. Martin
Denise M. Martin
1946 Newcomer Road
Chambersburg, PA 17202

Brian D. Brechbill
Michelle L. Brechbill
3820 Fetterhoff Chapel Rd
Chambersburg, PA 17202

Mark E. Gayman
11742 Gehr Road
Waynesboro, PA 17268

Jonathan P. Baker
Rosalie M. Baker
9380 Five Forks Road
Waynesboro, PA 17268

Mark E. Gayman
Sally A. Gayman
5460 Stamy Hill Road
Waynesboro, PA 17268

Mahlon R. Eby
Debra S. Eby
6685 Anthony Highway
Waynesboro, PA 17268

John V. Rudolph
Eunie Rudolph, Jr.
7270 Buttermilk Road
Waynesboro, PA 17268

Rodney A. Meyer
5413 Manheim Road
Waynesboro, PA 17268

Lamar V. Rudolph
Edna F. Rudolph
5401 Manheim Road
Waynesboro, PA 17268

Harlan D. Hess
Carrie E. Hess
8200 Helman Road
Waynesboro, PA 17268

Robert T. Morgan
Judith A. Morgan
5516 Manheim Road
Waynesboro, PA 17268

Stephen L. Martin
Esther N. Martin
6000 Manheim Road
Waynesboro, PA 17268

Marlin L. Martin
Carrie R. Martin
8686 Pleasant Ridge Road
Harrisonville, PA 17228

John A. Steiger
Allison F. Steiger
5465 Hess Benedict Road
Waynesboro, PA 17268

Roy B. Biesecker
Susan L. Biesecker
8410 Wayne Highway
Waynesboro, PA 17268

Brethren United Orphanage
6596 Orphanage Road
Waynesboro, PA 17268

Roy S. Martin
Regina F. Martin
4913 Shady Lane
Waynesboro, PA 17268

DC Farms LLC
13689 Dream Highway
Newburg, PA 17240

Charles W. Mellott
9702 Wayne Highway
Waynesboro, PA 17268

Daniel S. Long
6405 Nunnery Road
Waynesboro, PA 17268

Albert L. Horst
Brenda K. Horst
5967 Tick Ridge Rd
Waynesboro, PA 17268

John E.N. Blair
11611 Prices Church Road
Waynesboro, PA 17268

Trademark Development Corp.
9932 Mentzer Gap Road
Waynesboro, PA 17268

Jane M. Zaiger
10329 Wayne Highway
Waynesboro, PA 17268

Denver N. Martin
Katrina J. Martin
6973 Nunnery Road
Waynesboro, PA 17268

Ronald P. Stoner
Doris M. Stoner
12477 Cold Springs Rd.
Waynesboro, PA 17268

Jack E. Martin
Emily L. Martin
12574 Polktown Road
Waynesboro, PA 17268

Joseph N. Weagley
6413 Marsh Road
Waynesboro, PA 17268

Owls Club Incorporated
87 West Main Street
Waynesboro, PA 17268

Daniel J. Eshleman
Elaine J. Eshleman
13868 N. Hoovers Mill Rd
Waynesboro, PA 17268

Norman J. Diller
Bonna J. Diller
20660 Millers Church Rd
Hagerstown, MD 21742

Merlin D. Eshleman
Renee Eshleman
14089 N. Hoovers Mill Rd
Waynesboro, PA 17268

Laverne Martin
Ellen Martin
14578 Wayne Highway
Waynesboro, PA 17268

Leslie Fahrney
915 Park Street
Waynesboro, PA 17268

Mary Ann Fox
6977 Iron Bridge Road
Waynesboro, PA 17268

Jack F. Martin et al
12574 Polktown Road
Waynesboro, PA 17268

Bruce I. Neibert Jr.
14819 Wayne Highway
Waynesboro, PA 17268

Andrew L. Carr
Sherri R. Carr
14808 Wayne Highway
Waynesboro, PA 17268

Gerald L. Zeigler
Jennifer S. Zeigler
14924 Wayne Hwy
Waynesboro, PA 17268

Tunde T. Tijani
503 Brookview Drive
Greencastle, PA 17225

Samuel A. Jones
Mandy L. Jones
7583 Lyons Road
Waynesboro, PA 17268

Kyle E. Schindel
Kelly A. Schindel
22032 Rocky Forge Road
Hagerstown, MD 21740

Myron J. Miller
Fern L. Miller
9180 Goods Dam Road
Waynesboro, PA 17268

Clarence W. Cook Jr.
22236 Ringgold Pike
Hagerstown, MD 21742

Louise E. Messler
22235 Ringgold Pike
Hagerstown, MD 21742

Leroy M. Hostetter
22001 Grove Road
Hagerstown, MD 21742

Richard A. Newcomer
13811 Poplar Grove Road
Hagerstown, MD 21742

Samuel C. Hunter
13651 Newcomer Road
Hagerstown, MD 21742

John S. Martin
22632 Gardenhour Road
Smithsburg, MD 21783

Paul A. Baker
22622 Gardenhour Road
Smithsburg, MD 21783

Boyd E. Frushour Jr.
22614 Gardenhour Road
Smithsburg, MD 21783

Gardenhour Orchards Inc.
P.O. Box 275
Smithsburg, MD 21783

William G. Gardenhour III
22511 Gardenhour Road
Smithsburg, MD 21783

Strite Family Enterprises
21640 Leitersburg Smithsburg Rd
Hagerstown, MD 21742

Richard Lee Grove
13001 Rowe Road
Smithsburg, MD 21783

Anne C. Winters
2934 Hamaker Lane
Smithsburg, MD 21783

Brocroft Kennels LTD
12936 Bradbury Ave
Smithsburg, MD 21783

Potomac Edison Co (First Energy)
Tax Dept
800 Cabin Hill Dr
Greensburg, PA 15601

James P. Mace
12908 Bikle Road
Smithsburg, MD 21783

ATTACHMENT 9

ATTACHMENT 9
LIST OF GOVERNMENTAL AGENCIES, MUNICIPALITIES AND OTHER PUBLIC ENTITIES CONTACTED

Federal Agencies

U.S. Army Corps of Engineers
Baltimore District-(Pennsylvania Section)
Regulatory Branch
1631 South Atherton Street
Suite 102
State College, PA 16801
Contact: Wade Chandlers, Chief PA Section

US Fish and Wildlife Service
PA Field Office Northeast Region
110 Radnor Rd
Suite 101
State College, PA 16801
Contact: Lora Lattanzi, Project Leader

U.S. Environmental Protection Agency – Region 3
1650 Arch Street
Mail Code: 3RA00
Philadelphia, PA 19103
Contact: Shawn Garvin, Regional Administrator

U.S. Department of Agriculture
National Resource Conservation Service
359 East Park Drive, Suite 2
Harrisburg, PA 17111
Contact: Hathaway Jones, Management Analyst

State Agencies

Pennsylvania Department of Conservation and Natural Resources
400 Market Street, 6th floor
Rachel Carson State Office Building
Harrisburg, PA 17105
Contact: Ellen Shultzabarger, Division Chief

Pennsylvania Department of Environmental Protection
Southcentral Regional Office
909 Elmerton Ave.
Harrisburg, PA 17110
Contact: Joseph Adams, Regional Director
Pennsylvania Fish and Boat Commission

1601 Elmerton Ave.
Harrisburg, PA 17106
Contact: John Arway, Executive Director

Pennsylvania Game Commission
8627 William Penn Highway
Southcentral Region
Huntingdon, PA 16652
Contact: Bradley J. Meyers, Director

Pennsylvania Department of Agriculture
2301 North Cameron Street
Suite G-6
Harrisburg, PA 17110
Contact: Daniel Naylor, Supervisor; Douglas M. Wolfgang, Director

Pennsylvania Historical & Museum Commission
400 North Street, 2nd floor
Commonwealth Keystone Building
Harrisburg, PA 17120
Contact: Andrea L. MacDonald

County/Municipal Agencies

Franklin County Planning Department
218 North Second Street
Chambersburg, PA 17201
Contact: Phil Tarquino, Director;

Southampton Township
705 Municipal Drive
Shippensburg, PA 17257
Contact: Maria Misner, Planning & GIS; Greg Richardson, Supervisor; Paul Witter, Chairman

Greene Township
1145 Garver Lane
Scotland, PA 17254
Contact: Todd Burns, Township Supervisor; Dan Bachman, Zoning Officer; Gregory Lambert, Township Engineer; Shawn Corwell, Township Supervisor

Guilford Township
115 Spring Valley Road
Chambersburg, PA 17202
Contact: Don Clapper, Chairman/Board of Supervisors; Wayne Statler, Zoning Officer

Quincy Township
7575 Mentzer Gap Rd.
Waynesboro, PA 17268
Contact: Kerry Brumbaugh, Chairman; Travis Schooley

Washington Township
13013 Welty Rd.
Waynesboro, PA 17268
Contact: Michael Christopher, Township Manager; Jeff Geesamen, Assistant Township Manager

Waynesboro Borough
5 E. Main Street
Waynesboro, PA 17268
Contact: Jason Stains, Borough Manager; Dan Sheffler, Code Enforcement Officer

Chambersburg Area School District
435 Stanley Avenue
Chambersburg, PA 17201
Contact: Matthew Varner, Director of Facilities

Elected Officials

Senator Richard Alloway via Chad Reichard, Chief of Staff
33rd District
Harrisburg Office
172 Main Capitol
Harrisburg, PA 17120

Senator Doug Mastriano
33rd District
Harrisburg Office
170 Main Capitol
Harrisburg, PA 17120

State Representative Rich Irvin
81st District
209 Ryan Office Building
PO Box 202081
Harrisburg, PA 17120

State Representative Paul Schemel
90th District
Room 121B, East Wing
PO Box 202090
Harrisburg PA 17120-2090

State Representative Chad Reichard
90th District
B-16 Main Capitol
PO Box 202090
Harrisburg PA 17120-2090

State Representative Stan Saylor via Chad Weaver, Chief of Staff
94th District
Capitol Office
245 Main Capitol Building
Harrisburg, PA 17120

Franklin County Commissioner Dean Horst
272 North Second Street
Chambersburg, PA 17201

State Representative Robert Kaufmann
89th District
Rm 312 Main Capitol
PO Box 202089
Harrisburg, PA 17120-2089

State Senator Scott Wagner via Jon Hopcraft, Chief of Staff
28th District
Senate Box 203028
Harrisburg, PA 17120

State Representative Kristin Phillips-Hill
93rd District
Room 123B, East Wing
PO Box 202093
Harrisburg PA 17120-2093

U.S. Rep. Scott Perry via Rob Reilly, Deputy Chief of Staff
4th District
2209 East Market Street
York, PA 17402

U.S. Rep. Bill Shuster via Nancy Bull, Constituent Services
9th District
100 Lincoln Way East, Suite B
Chambersburg, PA 17201

ATTACHMENT 10

Attachment 10
Transource Pennsylvania

EXAMINATION

A complete copy of the Application for the 9A West Project is available for examination during ordinary business hours at the following locations:

Alexander Hamilton Memorial Free Library

45 E Main Street

Waynesboro, PA 17268

Mont Alto Campus Library (Penn State Library)

1 Campus Drive

Mont Alto, PA 17237

Coyle Free Library

102 North Main Street

Chambersburg, PA 17201

ATTACHMENT 11

ATTACHMENT 11
ELECTRIC AND MAGNETIC FIELDS POLICY AND PRACTICES

Electric and Magnetic Fields Policy and Practices of Transource Pennsylvania and Transource Maryland

Introduction

Electric and magnetic fields (EMF) are everywhere. Virtually all human beings in industrialized countries are exposed to them most of the time. Electric and magnetic fields are produced by household wiring and appliances, cell phones, and by all other electric equipment.

One of the many sources of electric and magnetic fields are the electric lines needed to power today's modern society. In order to meet their customers' needs by providing service that is reliable, economical, and as safe as possible, Transource Pennsylvania and Transource Maryland foster communication with customers and employees regarding EMF, keep well-informed about worldwide scientific studies and developments related to EMF, and participate in EMF research through their relationship with American Electric Power and Great Plains Energy affiliates, and their membership and engagement in industry associations.

Measures for Mitigating EMF Impacts

Transource Pennsylvania and Transource Maryland employ a variety of standards and practices to mitigate the EMF impact of their transmission facilities, and to address public concerns about EMF produced by power lines. These practices can be classified into three general categories – informational, technical and line siting – all reflecting the principles of precautionary measures and prudent avoidance, which are applied when the associated costs are low or negligible.

a. Informational

The informational practices include communicating with customers, employees, and the general public regarding EMF, following closely the EMF scientific developments, and participating in and sponsoring EMF research. In this regard, Transource Pennsylvania and

Transource Maryland (through their affiliate American Electric Power Service Corporation) are members of the Electric Power Research Institute (EPRI), a non-profit organization that, among other activities and areas of research, sponsors studies to enhance the understanding of EMF health effects, as well as methods to mitigate the EMF impact of electric transmission facilities.

These informational practices focus on enhancing public understanding about EMF. For example, and depending on specific circumstances, public information about EMF may highlight the fact that EMF exist not only near electric utility lines but also around electrical wiring in homes and electric appliances, sometimes with considerably greater personal exposures. Furthermore, they explain that electric and magnetic fields decrease, at certain points dramatically, the greater the distance between the source and the point where the field's strength is measured (commonly in kilovolts per meter (kV/m) for electric fields and gauss, or milligauss (mG), for magnetic fields). A greater understanding of the fact that in typical transmission lines both electric and magnetic field levels drop sharply from the centerline to the edge of the right-of-way (ROW), and continue to drop with distance, is helpful and reassuring information for customers, the general public, and employees, as is knowledge that a specific line's field levels are well within the limits specified in industry standards, such as The Institute of Electrical and Electronics Engineers (IEEE) Standard C95.6™-2002 (R2007), which sets the safety levels with respect to human exposure to electromagnetic fields.

Finally, the companies conduct EMF measurements on a case-by-case basis, free of charge, upon request from property owners who are directly-affected by existing facilities, and have concerns about the EMF health effects or impact on medical devices.

b. Technical

Transource Pennsylvania and Transource Maryland EMF mitigation practices in the technical category are based on the companies' engagement in EMF scientific developments and research, as well as their compliance with applicable industry standards such as IEEE Std C95.6 and the National Electrical Safety Code (NESC) Rule 232C.

The companies' line design practices take into consideration their facilities' electric and magnetic fields, and their compliance with these standards. In situations where further mitigation measures are determined to be appropriate based on a case-by-case review and evaluation, practical means for reducing ground-level EMF exposures or concerns regarding such exposures include direct communication and educational meetings, field measurements, using particular conductor configurations and/or phase arrangements (such as a compact and/or delta configuration of line conductors, or arranging the phases of a double-circuit line to achieve most EMF cancellation), increasing conductor ground clearances beyond those based on industry standards, and reducing electric fields by employing various screening techniques, depending on the particular circumstances.

c. Line Siting

In siting new lines, the route selection process considers proximity to residences, schools, daycares, hospitals, and other community facilities. Consideration of these features in the route development and selection process ultimately supports the identification of a route that has the least overall impact on land use in the area. At the same time, consideration of the proximity of the line to these features also inherently reduces potential EMF exposure.

In summary, the companies strive to employ precautionary measures to achieve the prudent avoidance of electromagnetic fields effect, employing, where appropriate or as necessary, mitigation practices with low or negligible additional costs.

ATTACHMENT 12

Transmission Field Services – Transmission Forestry

Transmission Vegetation Management Program (TVMP)

Effective Date: 7/31/2025

Supersedes TVMD-0001 Rev. 22

Description: Describes how AEP Transmission ensures compliance with the North American Electric Reliability Corporation Reliability Standard FAC-003-5

Note: Printed copies of this document are uncontrolled and may be obsolete. This document has been prepared by, and is the property of, American Electric Power Company, Inc., is intended for AEP use only, is not to be used for any purpose detrimental to AEP's interest, and is not to be furnished to, or copied or reproduced by, parties not affiliated with the AEP System without the express written consent of AEP, and is to be returned upon request.

Document Control

Preparation

Prepared By	Title	Signature	Date
Emmett W. Albertson	Trans Sys Forestry Coord Sr, Transmission Forestry	Signed by: AED2E873896441C...	6/23/2025 | 1:41 PM EDT
Ben Bradburn	Trans Sys Forestry Coord Staff, Transmission Forestry	DocuSigned by: Benjamin N. Bradburn FC7539A0526E4C3...	11:09 AM EDT
David W. Daniels	Engineer Prin, NERC And OT Cyber Engineering	DocuSigned by: David Daniels 5C29661CD3014C2...	/23/2025 | 9:18 AM PDT
Travis A. Dickmeyer	Utility Forester, Transmission Forestry	Signed by: 7ACD94A3D9FF41E...	6/23/2025 | 1:18 PM EDT
Erik J. Fletcher	Trans Sys Forestry Coord Sr, Transmission Forestry	DocuSigned by: 264C54DE4 994A3...	3/2025 | 11:22 AM EDT
Connor W. Grooms	Engineer, Trans Line Eng PJM Central	Signed by: C2DF9A9F5869489...	6/23/2025 | 1:11 PM EDT
Richard L. Karber	Trans Sys Forestry Coord Staff, Transmission Forestry	DocuSigned by: Richard Karber C79F60D5B7BB44A...	6/23/2025 | 11:40 AM EDT
Edward C. Kusel	NERC Compliance Spec, EDS Compliance And Process	Signed by: Edward C Kusel 0D804EA23D2C4A9...	/2025 | 11:42 AM EDT
Colby G. Norgaard	Utility Forester Sr, Transmission Forestry	Signed by: 740E8E9AE5E6416...	6/23/2025 | 1:30 PM EDT
Benjamin L. Thorp III	Trans Sys Forestry Coord Staff, Transmission Forestry	DocuSigned by: 68B80FF091884DD...	6/23/2025 | 1:20 PM EDT
Emily G. Walker	Utility Forester Assc, Transmission Forestry	Signed by: B1587253C07C450...	6/26/2025 | 7:46 AM EDT

Review

Reviewed By	Title	Signature	Date
Orlando De La Garza	Transmission Forestry Mgr, Transmission Forestry	DocuSigned by: Orlando De La Garza 5A8735EB5009460...	10:19 PM EDT

Reviewed By	Title	Signature	Date
Terry A. Fuller	Engineer Staff, Gen New Project Development	Signed by: Terry Fuller 27B67ADBC22F44B...	7/1/2025 | 8:56 AM EDT

Approval

Approved By	Title	Signature	Date
David R. Ball	SVP Transmission System Operations, AEP Transmission Admin	Signed by: David R Ball 6B3D6D95BDDA4F8...	7/1/2025 | 1:24 PM EDT
Brian L. Ellis	Dir Trans Systems Ops Engineering, Trans Operation Reliability	DocuSigned by: Brian Ellis 4F22686D27894FA...	7/17/2025 | 12:57 PM EDT
Matt Miller	Dir Gen Engineering, VP Eng Services	DocuSigned by: Matt Miller 80302E248EDB499...	7/1/2025 | 9:30 AM EDT
Kevin B. Patton	Dir Vegetation Mgmt TFS, Transmission Forestry	DocuSigned by: 2558195B5BA84DF...	7/1/2025 | 8:58 AM EDT
Archie D. Pugh	VP Trans Field Services, Trans Field Services East	DocuSigned by: Archie Pugh DA98617C68CB40E...	7/6/2025 | 6:48 AM EDT
Matthew S. Veith	Mng Dir Trans System Ops Engineeri, Trans Operation Reliability	Signed by: Matthew S Veith F70DC187C9DF408...	7/16/2025 | 10:07 AM EDT

Implementation

Effective Date	7/31/2025
Review Frequency (Years)	1
Retention Period (Years)	5
Option to Build Class	N/A
Audience	Line Engineering, Line Stds, Generation, TFS, Forestry

Review Cycle

Version	Description	Review Cycle	Retention Period	Review Date
1	Reviewed with Changes to Ver. 0.	Annual	3 Yrs	1/16/2006
2	Reviewed with Changes to Ver. 1 and 2.	Annual	3 Yrs	3/12/2007
5	Reviewed with Changes to Ver. 3, 4, and 5.	Annual	3 Yrs	5/6/2008
8	Reviewed with Changes to Ver. 6.	Annual	5 Yrs	5/26/2009
9	Reviewed with Changes to Ver. 8.	Annual	5 Yrs	7/27/2010
10	Reviewed with Changes to Ver. 9.	Annual	5 Yrs	7/21/2011
11	Reviewed with Changes to Ver. 10.	Annual	5 Yrs	7/12/2012
12	Reviewed with Changes to Ver. 11.	Annual	5 Yrs	7/15/2013
13	Reviewed with Changes to Ver. 12.	Annual	5 Yrs	7/18/2014
14	Reviewed with Changes to Ver. 13.	Annual	5 Yrs	7/17/2015
15	Reviewed with Changes to Ver. 14.	Annual	5 Yrs	7/8/2016
16	Reviewed with Changes to Ver. 15.	Annual	5 Yrs	7/21/2017
17	Reviewed with Changes to Ver. 16.	Annual	5 Yrs	7/25/2019
18	Reviewed with Changes to Ver. 17.	Annual	5 Yrs	7/27/2020
19	Reviewed with Changes to Ver. 18.	Annual	5 Yrs	7/21/2021
20	Reviewed with Changes to Ver. 19.	Annual	5 Yrs	8/31/2022
21	Reviewed with Changes to Ver. 20.	Annual	5 Yrs	7/31/2023
22	Reviewed with Changes to Ver. 21.	Annual	5 Yrs	7/31/2024
23	Reviewed with Changes to Ver. 22.	Annual	5 Yrs	7/31/2025

Revision History

Version	Description	Prepared By	Reviewed By	Approved By	Effective Date
1	Added Appendixes A and B.	H.R. Jones, Principal Engineer	-	J.E. Schechter, Mgr., Trans. Line Asset Engineering	1/16/2006
2	Added Appendix C.	H.R. Jones, Principal Engineer	-	J.E. Schechter, Mgr., Trans. Line Asset Engineering	10/2/2006
3	Added Revision History.	H.R. Jones, Principal Engineer	-	J.E. Schechter, Mgr., Trans. Line Asset Engineering	3/12/2007
3	Revised Appendix C from Version 2. Clarified video text associated with aerial patrols, page 8.	H.R. Jones, Principal Engineer	-	J.E. Schechter, Mgr., Trans. Line Asset Engineering	3/22/2007
4	Revised Maintenance Clearances in Table I, page 11. Removed Appendix A from Revision 0 and inserted a new Appendix A. Removed Appendix B from Revision 0 and renamed Appendix C from Revision 0 to Appendix B.	H.R. Jones, Principal Engineer	-	J.E. Schechter, Mgr., Trans. Line Asset Engineering	11/9/2007
5	Revised Maintenance Clearances text page 10. Revised Appendix B.	H.R. Jones, Principal Engineer	-	J.E. Schechter, Mgr., Trans. Line Asset Engineering	5/6/2008
6	Added third level of review/approval. Added Internal Mailing list. Added Standard mapped to TVMP. Revised Contents and page numbers. Revised Maintenance Clearances, pages 13 and 14. Revised Imminent Threat, pages 10 and 11. Revised Appendix A. Added new Appendix C. Added new Appendix D. Added hyperlinks.	S .J. Reaves, Forestry Program Coordinator I	J.E. Schechter, Mgr., Trans. Line Asset Engineering	D.R. Boezio, Dir., Trans. Asset Engineering	6/15/2009

Version	Description	Prepared By	Reviewed By	Approved By	Effective Date
8	Revised Version History. Revised Personnel Qualifications, Appendix D. Included References on Contents Page. Revised Subject Matter Experts (SMEs).	S.J. Reaves, Forestry Program Coordinator I	J.E. Schechter, Mgr., Trans. Line Asset Engineering	D.R. Boezio, Dir., Transmission Asset Engineering	7/31/2009
9	Revised Reviewer and Approval List. Revised TVMP Internal Mailing List. Changed Landowner and Community Relations section to Land Owner Relationships and Environmental Sustainability. Revised Subject Matter Experts (SMEs). Revised Personnel Directly Involved.	D.K. Killingsworth, Engineer I	J.E. Momme, Dir., Trans. Line Projects Engineering	D.J. Recker, Managing Dir., Trans. Projects Engineering	7/30/2010
10	Reformatted Document to match Transmission Forum Model TVMP.	D.K. Killingsworth, Engineer I	J.E. Momme, Dir. Trans. Line Projects Engineering	D.J. Recker, Managing Dir. Trans. Projects Engineering	7/30/2011
11	Revised Reviewer and Approval List. Revised TVMP Internal Mailing List. Changed Land Owner Relationships and Environmental Sustainability to Land Owner Relationships and revised. Revised Subject Matter Experts (SMEs). Revised Personnel Directly Involved. Removed Appendix C. Revised Personnel Qualifications. Revised New Construction Clearing. Added Document Team.	K.B. Patton, Utility Forester II	J.E. Momme, Dir., Trans. Line Projects Engineering	D.J. Recker, Managing Dir., Trans. Projects Engineering	7/31/2012

Version	Description	Prepared By	Reviewed By	Approved By	Effective Date
12	Revised Document Team. Revised Subject Matter Experts (SMEs). Revised Appendix A Imminent Threat Communication and Procedures. Revised Appendix B Imminent Threat Communication. Revised Appendix C TVMP Internal Mailing List. Revised Forestry Patrol Procedures. Revised Imminent Threat Report Form.	K.B. Patton, System Forestry Coordinator	J.E. Momme, Dir., Trans. Line Projects Engineering	D.J. Recker, Managing Dir., Trans. Projects Engineering	7/30/2013
13	Revised Document Team. Revised Signature page. Updated References. Revised entire document to align with changes to NERC Standard FAC-003-3. Revised Personnel Directly Involved. Moved Right-of-Way Clearance Guidelines to Appendix A. Updated Appendix C: Subject Matter Experts. Revised Appendix D TVMP Internal Mailing List.	Lynn Hayward, Lead Engineer	J.E. Momme, Dir., Trans. Line Projects Engineering	J.E. Momme, Dir., Trans. Line Projects Engineering	7/31/2014
14	Revised Document Team. Updated References. Removed Imminent Threat Procedure. Updated MVCD distances.	Lynn Hayward, Senior Engineer	J.E. Momme, Dir., Trans. Line Projects Engineering	J.E. Momme, Dir., Trans. Line Projects Engineering	7/31/2015
15	Revised Document Team. Updated MVCD distances per new FAC-003-4 Standard. Minor wording changes. Updated Distribution List.	Lynn Hayward, Senior Engineer	J.E. Momme, Dir., Trans. Line Projects Engineering	J.E. Momme, Dir., Trans. Line Projects Engineering	7/31/2016
16	Updated Document Team. Minor wording changes. Updated Distribution List.	Lynn Hayward, Senior Engineer	J.E. Momme, Dir., Trans. Line Projects Engineering	J.E. Momme, Dir., Trans. Line Projects Engineering	7/31/2017

Version	Description	Prepared By	Reviewed By	Approved By	Effective Date
17	Return to an annual review cycle. Addition of LiDAR and valley span methodology	John Booze, Senior Engineer	K. Patton, Mgr., Transmission Forestry	J.E. Momme, Dir., Trans. Line Projects Engineering Walter A. Sherry, Dir., Trans Forestry & TFS Perf Mgmt	7/31/2019
18	Updated Document Team. Minor wording changes. Updated Distribution List.	John Booze, Engineer Senior	K. Patton, Mgr., Transmission Forestry	J.E. Momme, Dir., Trans. Line Projects Engineering Walter A. Sherry, Dir., Trans Forestry & TFS Perf Mgmt	7/31/2020
19	Updated Document Team. Minor updated to inspection language. Updated Distribution List	John Booze, Engineer Senior	K. Patton, Mgr., Transmission Forestry	J.E. Momme, Dir., Trans. Line Projects Engineering Walter A. Sherry, Dir., Trans Forestry & TFS Perf Mgmt	7/31/2021
20	Updated Document Team and Referenced Documents. Updated language for consistency. Updated Distribution List.	Alexandra Huey, Engineer Senior	Benjamin Bradburn, Supervisor, Region Forestry, Transmission Forestry	J.E. Momme, Dir., Trans. Line Projects Engineering Kevin Patton, Dir., Vegetation Management	8/31/2022
21	Updated Document Team and Referenced Documents. Updated language for consistency. Incorporated changes to comply with FAC-003-5. Updated Distribution List.	Alexandra Huey, Engineer Senior	Orlando DeLa Garza, Transmission Forestry Mgr, Transmission Forestry	Scott Dimpfl, Dir., Trans. Line Engineering Kevin Patton, Dir., Vegetation Management	7/31/2023
22	Updated Document Team and Referenced Documents. Updated language for consistency. Updated Distribution List.	Richard L. Karber, Supervisor	Orlando DeLa Garza, Transmission Forestry Mgr, Transmission Forestry	Scott Dimpfl, Dir., Trans. Line Engineering Kevin Patton, Dir., Vegetation Management	7/31/2024

Version	Description	Prepared By	Reviewed By	Approved By	Effective Date
23	Updated Reviewers and Approvers. Updated Referenced Documents. Replaced LiDAR with Remote Sensing verbiage. Updated Appendix B: Subject Matter Experts. Updated Appendix C: TVMP Internal Distribution List.	Ben Bradburn, Forestry Coord Staff	Orlando De La Garza, Transmission Forestry Mgr, Transmission Forestry	David R. Ball, SVP Transmission System Operations Brian L. Ellis, Dir Trans Systems Ops Engineering Matt Miller, Dir Gen Engineering Kevin B. Patton, Dir Vegetation Mgmt TFS Archie D. Pugh, VP Trans Field Services Darren A. Shepard, VP Energy Delivery Engineering	7/31/2025

Table of Contents

Document Control 2
Preparation 2
Review 2
Approval 3
Implementation 3
Review Cycle 4
Revision History 5
Table of Contents 10
1.0 References 12
2.0 The Transmission Vegetation Management Program 12
2.1 Scope 12
2.2 Vegetation Management Objectives 13
2.3 Terms and Definitions 14
3.0 FAC-003-5 Requirements 15
3.1 Requirement 1 (Manage Vegetation to Prevent Encroachments into the MVCD on All Applicable FAC-003 Lines) 15
3.2 Requirement 2 (Reserved for Future Use) 15
3.3 Requirement 3 (Maintenance Strategy) 15
3.4 Requirement 4 (Vegetation Condition That is Likely to Cause a Fault at any Moment) 16
3.5 Requirement 5 (Vegetation Constraint May Lead to an Encroachment Into the MVCD) 17
3.6 Requirement 6 (Annual Inspections) 17
3.6.1 Vegetation Inspections 17
3.6.2 Forestry Inspection Procedures 17
3.6.2.1 Inspection of the AEP Transmission System 17
3.6.2.2 Inspection Schedule 17
Table 1: Inspection Schedule 18
3.6.2.3 Remote Sensing 18
3.6.3 Exceptions 18
3.7 Requirement 7 (Annual Work Plan) 18

4.0 Appendix A: ROW Clearance Guidelines 20
Table 2: Transmission Line Clearance Guidelines at Conductor Maximum Sag and Movement 20
5.0 Appendix B: Subject Matter Experts 22
6.0 Appendix C: TVMP Internal Distribution List 24

1.0 References

AEP Transmission Vegetation Management Documents are located in the Published TVMD Documents library. Tree Care Industry Association documents can be obtained from the Tree Care Industry Association.

Title	Date	Revision
AEP Forestry: Vegetation Management Goals, Procedures & Guidelines for Distribution and Transmission Line Clearance Operations	2022	6
AEP *A Safe & Reliable Right-of-Way*	2023	N/A
AEP TVMD-0003 *Vegetation Inspection and Patrol Practices*	2024	5
AEP TVMD-0009 *Imminent Threat Communication and Procedures*	2025	9
AEP TVMD-0011 *Vegetation Management Guideline for Maximum Conductor Sag and Blowout*	2023	3
AEP TVMD-0014 *Risk Assessment and Procedures*	2025	8
NERC FAC-003-5 *Transmission Vegetation Management*	2023	5
TCIA *Tree, Shrub, and Other Woody Plant Management - Standard Practices*, Part 1 – Pruning	2014	ANSI A300 (Part 1) – 2008 (R2014)
TCIA *Tree, Shrub, and Other Woody Plant Management - Standard Practices*, Part 7 – Integrated Vegetation Management (IVM), a. Electric Utility Rights-of-way	2012	ANSI A300 (Part 7) – 2012
TCIA *The American National Standard for Arboriculture Operations – Safety Requirements*	2017	ANSI Z133.1-2017

2.0 The Transmission Vegetation Management Program

2.1 Scope

The American Electric Power (AEP) Transmission Vegetation Management Program (TVMP) has been developed and implemented to ensure compliance with the North American Electric Reliability Corporation (NERC) Reliability Standard FAC-003-5. This program is intended to maintain a reliable electric transmission system by using a defense-in-depth strategy to manage vegetation located on transmission rights-of-way (ROW) and minimize encroachments from vegetation located adjacent to the ROW, thus preventing the risk of those vegetation-related outages that could lead to Cascading.

This program applies to AEP's transmission and generation Facilities as defined in FAC-003-5. Facilities referred to as FAC-003 applicable are:

- Transmission lines operated at 200 kV and above (≥ 200kV);
- Other lower-voltage transmission or generation lines operated below 200kV that if lost or degraded could result in instances of instability, Cascading, or uncontrolled separation that may adversely impact reliability and that have been identified by the Planning Coordinator or Transmission Planner, per its Planning Assessment of the Near-Term Transmission Planning Horizon;
- Each overhead transmission line identified above, located outside the fenced area of the switchyard, station or substation, and any portion of the span of the transmission line that is crossing the substation fence;
- Overhead generation lines that extend greater than one mile beyond the fenced area of the generating station switchyard to the point of interconnection with a Transmission Facility or that do not have a clear line of sight and are operated at 200 kV and above (≥ 200kV).

AEP's Transmission Forestry Operations group manages and executes the program for vegetation along FAC-003 applicable transmission and generation rights-of-way in portions of eleven states. This is accomplished through the implementation and oversight of a comprehensive, systematic vegetation management program.

2.2 Vegetation Management Objectives

The TVMP is an integral part of providing for the safe, reliable operation of the AEP transmission system. The key measure of success is zero reportable vegetation-related outages on FAC-003 applicable Facilities.

For FAC-003 applicable Facilities, AEP's intent is to clear the ROW to the maximum appropriate width by removing all woody-stemmed vegetation within the ROW[1] and potential hazard trees.

AEP conducts inspections (aerial and targeted ground inspections) and develops annual vegetation management work plans to ensure the program objective is achieved in the most efficient, environmentally sound, and economical manner practicable.

AEP strives to manage its ROW in accordance with its Safety and Health Philosophy: "No aspect of operations is more important than the health and safety of people. Our customers' needs are met in harmony with environmental protection."

Additional considerations include:

- Minimizing adverse environmental impacts.
- Complying with laws and regulations.
- Achieving cost efficiency.
- Maintaining a positive relationship with landowners and the public.

[1]Upon completion of vegetation maintenance.

2.3 Terms and Definitions

Cascading: "The uncontrolled successive loss of System Elements triggered by an incident at any location. Cascading results in widespread electric service interruption that cannot be restrained from sequentially spreading beyond an area predetermined by studies."[2]

Facility: "A set of electrical equipment that operates as a single Bulk Electric System Element (e.g., a line, a generator, a shunt compensator, transformer, etc.)."[2]

Hazard tree: A structurally unsound tree that could strike a target (such as electric facilities) when it fails.[3]

Inspector: Individual assigned with the responsibility of evaluating vegetation clearances inside and adjacent to the Transmission ROW.

Maximum Sag: The conductor's greatest sag when the line is at maximum operating temperature (MOT), which reduces the distance from conductor to ground.

Minimum Vegetation Clearance Distance (MVCD): "The calculated minimum distance stated in feet (meters) to prevent flash-over between conductors and vegetation, for various altitudes and operating voltages."[2]

Near-Term Transmission Planning Horizon: "The transmission planning period that covers Year One through five."[2]

Remediation: The evaluation of a point of interest, and if necessary, taking action to resolve the identified vegetative issues.

Right-of-Way (ROW): "The corridor of land under a transmission line(s) needed to operate the line(s). The width of the corridor is established by engineering or construction standards as documented in either construction documents, pre-2007 vegetation maintenance records, or by the blowout standard in effect when the line was built. The ROW width in no case exceeds the applicable Transmission Owner's or applicable Generator Owner's legal rights but may be less based on the aforementioned criteria."[2]

Sustained Outage: "The deenergized condition of a transmission line resulting from a fault or disturbance following an unsuccessful automatic reclosing sequence and/or unsuccessful manual reclosing procedure."[2]

Vegetation Inspection: "The systematic examination of vegetation conditions on a ROW and those vegetation conditions under the applicable Transmission Owner's or applicable Generator Owner's control that are likely to pose a hazard to the line(s) prior to the next planned maintenance or inspection. This may be combined with a general line inspection." [2]

WECC Transfer Path: The transmission paths monitored by the WECC (Western Electric Coordinating Council) regional Reliability coordinators. Note: AEP does not operate in the WECC region.

---

[2]North American Electric Reliability Corporation, *Glossary of Terms Used in NERC Reliability Standards* (Atlanta, GA: North American Electric Reliability Corporation, 2021), accessed July 5, 2024, http://www.nerc.com/pa/Stand/Glossary%20of%20Terms/Glossary_of_Terms.pdf.

[3]Tree Care Industry Association, ANSI A300 (Part 7) – 2012, *Tree, Shrub, and Other Woody Plant Management - Standard Practices*, Part 7 – Integrated Vegetation Management (IVM), a. Electric Utility Rights-of-way, 58.

3.0 FAC-003-5 Requirements

3.1 Requirement 1 (Manage Vegetation to Prevent Encroachments into the MVCD on All Applicable FAC-003 Lines)

AEP maintains records of sustained outages from all causes. All outages determined to be caused by vegetation are investigated by appointed AEP employees, and information is obtained specific to the line designation, voltage, date and time of the disturbance, species, location relative to the line, NERC outage category, and duration of the outage if it was sustained. Sustained transmission line outages that are determined to have been caused by vegetation are reported to the Regional Entities or their designees. The supporting document AEP uses to identify vegetation outage information is a periodic report generated from an internal AEP system. The report lists vegetation-related outages by Regional Entities. The report lists the names of circuits where outages occurred; operated voltages; the date, time, and duration of the outage; and a description of the cause of the outage.

AEP conducts biannual vegetation inspections of all applicable Facilities. During these inspections, AEP inspects the vegetation-to-conductor clearances and identifies vegetation on and along transmission ROWs that could pose a reliability risk to the Facility. Aerial inspections, except where the Federal Aviation Administration (FAA) or other ordinance prohibits flight, cover substantial portions of the transmission system to identify areas where remediation may be needed to prevent vegetation from interfering with circuit operation. Ground inspections are used to supplement aerial inspections and where aerial inspections are restricted.

A confirmed encroachment into the MVCD as identified in NERC Standard FAC-003-5 Minimum Vegetation Clearance Distances (MVCD) (see Table 2) observed in real time during the inspection, is reported to the Transmission Forestry Manager. The Vegetation Imminent Threat Incident Report and supporting documentation are submitted to the Manager. These events are reported to the Regional Entity in accordance with NERC policy.

3.2 Requirement 2 (Reserved for Future Use)

3.3 Requirement 3 (Maintenance Strategy)

For FAC-003 applicable Facilities, AEP's fundamental strategy is to clear the ROW to the maximum appropriate width by removing all woody-stemmed vegetation within the ROW[4] and potential hazard trees.

AEP considers conductor location and movement, the MVCD, and vegetation growth between maintenance activities when developing its maintenance plan. Maintenance does not occur on a rigid "cycle" basis; rather, the maintenance technique and schedule are driven by the condition of the vegetation observed during biannual inspections. Vegetation-to-conductor distances are based on completed work meeting or exceeding the clearance distances in Column B of Table 2.

[4]Upon completion of vegetation maintenance.

AEP Transmission Forestry's goal is to convert the vegetative cover types on its transmission ROW to low growing grass-forbs-herb covers that inhibit the germination, establishment, and growth of most incompatible vegetative species.

The AEP transmission vegetation management program emphasizes tree removal to promote long-term vegetation control and to minimize future maintenance expenditures. Additionally, AEP foresters and contractor personnel inspect for hazard trees during scheduled maintenance. Hazard trees are addressed on a case-by-case basis by the responsible forester.

Manual clearing is employed where the terrain is too steep or rough for mechanized equipment, where the vegetation is too tall for herbicide applications and aerial application is not possible, or where the immediate removal of vegetation is necessary. Contract employees use chainsaws to selectively remove vegetation from the ROW.

Mechanical clearing may be employed where terrain and access allow and where the vegetation is not too large for mechanical equipment to handle, where the vegetation is too tall for herbicide applications, where aerial application is not possible, or where the immediate removal of vegetation is necessary.

When tree removal or clearing is not practical or obtainable, tree pruning may be employed. AEP Transmission Forestry may use tree growth regulators (TGRs) to reduce the frequency and amount that trees must be pruned.

Mechanical pruning operations employ a variety of boom-mounted saws on vehicles capable of traversing the ROW. Access, terrain, and tree heights influence the type of equipment used. When applicable, ROW may be maintained with an aerial saw. These rights-of-way possess one or more of the following characteristics: steep, mountainous terrain; limited access; or prohibitive costs to prune by conventional means.

Manual and mechanical clearing without follow-up herbicide applications do not control the root systems of incompatible vegetation and could increase the future maintenance requirements in the areas where it is employed. Aerial, high-volume foliar, low-volume foliar, ultra-low-volume foliar, cut stubble, stump, basal, and granular applications may be employed. United States EPA-registered herbicides are applied by licensed pesticide application businesses contracted by AEP.

3.4 Requirement 4 (Vegetation Condition That is Likely to Cause a Fault at any Moment)

A vegetation condition that is likely to cause a fault at any moment is considered an imminent threat to the reliable operation of a FAC-003 applicable Facility. An imminent threat must be mitigated within 24 hours of confirmation by AEP Transmission Forestry. This condition may be characterized by either vegetation or hazard trees approaching or threatening to approach the MVCD. For locations found during inspections, routine work, or other observations, where a potential imminent threat condition is confirmed

by AEP Transmission Forestry, an immediate notification[5] to the local dispatching authority is required. This will allow for mitigating actions, such as removal of the vegetation, temporary reduction in circuit rating, or switching the circuit out of service, until the imminent threat is relieved.

Refer to TVMD-0009 *Imminent Threat Communication and Procedures*.

3.5 Requirement 5 (Vegetation Constraint May Lead to an Encroachment Into the MVCD)

Restrictions may include refusals by property owners to access or perform work, orders to stop work by local authorities, restrictions by federal and/or state agencies, or legal injunctions. The maintenance strategy in section 3.3 defines the expected extent of clearing. If the clearance specifications cannot be achieved at the time of scheduled maintenance, AEP shall implement corrective action. This corrective action may include more-frequent maintenance or more-frequent inspections to monitor the risk to the system. Corrective actions are documented in AEP's restriction log.

3.6 Requirement 6 (Annual Inspections)

3.6.1 Vegetation Inspections

Aerial inspections are conducted to identify areas of the transmission system where remediation may be needed to prevent vegetation from interfering with circuit operation except where the FAA or other ordinance prohibits flight. Ground inspections are used to supplement aerial inspections and where aerial inspections are restricted. Aerial and ground inspections aid in the development of the vegetation maintenance work plan.

3.6.2 Forestry Inspection Procedures

3.6.2.1 Inspection of the AEP Transmission System

AEP shall perform biannual inspections on 100% of all FAC-003 applicable Facilities. Inspections provide Transmission Foresters a view of ROW conditions and the effectiveness of the vegetation management program.

3.6.2.2 Inspection Schedule

Inspection schedules are summarized in Table 1.

[5] NOPR RM-12-4-000, page 50, #85 (10/18/2012)—NERC explains that the obligation to notify without intentional delay generally "can be understood to include an immediate (within 1 hour of observation) communication notwithstanding a safety issue to personnel, other immediate priority maintenance functions to ensure reliability or system stability, or communication equipment failures that precludes immediate communication."

Table 1: Inspection Schedule

	Fall Inspection	Spring Inspection
Inspection	Aug 15–Nov 15	By May 21 In areas at higher elevation or with later vegetation emergence, this date may be extended to June 4.
Remediation	A1 Condition: addressed within 24 hours of confirmation.	A1 Condition: addressed within 24 hours of confirmation.
	P1 Condition: complete by March 1 of the following year.	P1 Condition: complete by May 30. In areas at higher elevation or with later vegetation emergence, this date may be extended to June 14.

3.6.2.3 Remote Sensing

Remote sensing will be conducted on approximately one-quarter of the FAC-003 applicable system annually. Remote sensing data will be used as a preventative control by providing a digital verification of aerial and ground inspection results and methodology.

3.6.3 Exceptions

Aerial inspections may be interrupted by force majeure, such as severe storms or floods. If patrols are interrupted, the time extension to complete the inspection shall not exceed the duration of the time AEP was prevented from performing the vegetation inspection.

3.7 Requirement 7 (Annual Work Plan)

AEP shall complete 100% of its annual vegetation work plan miles on FAC-003 applicable Facilities to ensure no vegetation encroachments occur within the MVCD. Modifications to the work plan in response to changing conditions or to findings from vegetation inspections may be made (provided they do not allow encroachment of vegetation into the MVCD) and must be documented. The work plan starts on January 1 and ends on December 31.

AEP has a process for documenting the vegetation management activities to ensure the following:

- Scheduled work is properly identified and listed in the work plan.
- Adjustments to the work plan are properly noted and recorded. This plan may be modified for the following reasons:
  - Change in expected growth rate/environmental factors
  - Circumstances that are beyond the control of an applicable Transmission Owner or applicable Generator Owner
  - Rescheduling work between growing seasons

- Crew or contractor availability/Mutual assistance agreements
- Identified unanticipated high priority work
- Weather conditions/Accessibility
- Permitting delays
- Land ownership changes/Change in land use by the landowner
- Emerging technologies

- Maintenance methods employed are noted for each type of work on each project listed in the work plan.
- Work quality inspections are performed, and work completed meets company specifications.

4.0 Appendix A: ROW Clearance Guidelines

When performing maintenance, the objective for locations on spans with less than 100 feet vertical clearance at maximum sag from conductor to ground is removal of all woody-stemmed vegetation to the appropriate width[6], leaving the cleared area of the ROW populated with grasses and herbaceous growth. Specific land use areas, such as orchards and road screens, may require special conditions or modifications to the standard clearances as shown in Table 2. In locations where AEP has a restriction from the stated clearances, additional inspections and maintenance activities will be performed as needed. For these areas, when maintenance activities have been completed, it is important to evaluate the final clearance, taking into consideration the maximum sag and movement of the conductor.

Some terrain in the AEP footprint contains long spans and/or valley spans. A long span is greater than 1,500 feet from structure to structure. A valley span goes from ridge/hilltop to ridge/hilltop where the vertical distance between conductor and ground is greater than 100 feet anywhere within the span. The risk profile for a long span could include an embedded knoll, ridge, or side slope. For these spans, vegetation is managed to meet the clearances of Table 2. If trees below the 100-feet clearance boundary at their mature height will violate clearance requirements, they shall be removed.

Table 2: Transmission Line Clearance Guidelines at Conductor Maximum Sag and Movement

Column A	Column B	Column C	Column D		Reference ANSI	Reference MVCD[7]
Nominal Voltage (kV phase to phase)	**AEP Desired Clearance Between Conductor and Vegetation**	**AEP Trigger Distance Between Conductor and Vegetation for P1 Conditions**	**AEP Trigger Distance Between Conductor and Vegetation for A1 Conditions**		**ANSI Minimum Approach Distances for Qualified Line Clearance Personal**	**Over Sea Level up to 5,000 ft.**
765kV	45’	30’	16’		27’04”	12’05”
500kV	45’	30’	15’		19’00”	7’07”
345kV	30’	15’	10’		13’02”	4’08”
230kV	30’	15’	10’		7’11”	4’05”

[6]Upon completion of vegetation maintenance.

[7]The distances in this Table are the minimums required by FAC-003-5 Industry Advisory Minimum Vegetation Clearance Distances (MVCD) updated August 12, 2015, to prevent Flash-over; however, prudent vegetation maintenance practices dictate that substantially greater distances will be achieved at the time of vegetation maintenance.

Column A	Column B	Column C	Column D		Reference ANSI	Reference MVCD[7]
Nominal Voltage (kV phase to phase)	**AEP Desired Clearance Between Conductor and Vegetation**	**AEP Trigger Distance Between Conductor and Vegetation for P1 Conditions**	**AEP Trigger Distance Between Conductor and Vegetation for A1 Conditions**		**ANSI Minimum Approach Distances for Qualified Line Clearance Personal**	**Over Sea Level up to 5,000 ft.**
161kV[8]	25′	10′	5′		6′00″	3′00″
138kV[8]	25′	10′	5′		5′02″	2′06″
115kV[8]	25′	10′	5′		4′06″	2′01″
88kV[8]	25′	10′	5′		4′06″	1′08″
69kV[8]	25′	10′	5′		4′02″	1′02″

[8]Such lines are applicable to this standard only if Planning Coordinator or Transmission Planner has determined such per its Planning Assessment of the Near-Term Transmission Planning Horizon.

5.0 Appendix B: Subject Matter Experts

FAC-003-5 Requirement	Description	Content Owner	SMEs	Reviewers
R1.–M1.	Manage vegetation to prevent encroachments into MVCD on all FAC-003 applicable lines	Richard L. Karber Trans Sys Forestry Coord Staff, Transmission Forestry 260-897-8090 rlkarber@aep.com	Connor W. Grooms Engineer, Trans Line Eng PJM Central 614-271-5013 cwgrooms@aep.com David W. Daniels Engineer Prin, NERC And OT Cyber Engineering 614-716-2191 dwdaniels2@aep.com	Orlando De La Garza Transmission Forestry Mgr, Transmission Forestry 325-657-2749 odelagarza@aep.com Kevin Patton Dir Vegetation Mgmt TFS, Transmission Forestry 614-933-2308 kbpatton@aep.com Terry A. Fuller Engineer Staff, New Project Development 614-716-1462 tafuller@aep.com Randy L. Calhoun Gen NERC & OT Cyber Compl Mgr, VP Eng Services 614-716-2194 rlcalhoun@aep.com Brian L. Ellis Dir Trans Systems Ops Engineering, Trans Operation Reliability 540-759-5534 blellis@aep.com
R2.–M2.	(Reserved for Future Use)			
R3.–M3.	Documented maintenance strategies	Richard L. Karber Trans Sys Forestry Coord Staff, Transmission Forestry 260-897-8090 rlkarber@aep.com	Todd C. McMillan Engineer Staff, TransLineEngrg DesignStandards 540-759-5561 tcmcmillan@aep.com Connor W. Grooms Engineer, Trans Line Eng PJM Central 614-271-5013 cwgrooms@aep.com David W. Daniels Engineer Prin, NERC And OT Cyber Engineering 614-716-2191 dwdaniels2@aep.com	
R4.–M4.	Notify the control center holding switching authority of a confirmed vegetation condition	Benjamin L. Thorp III Trans Sys Forestry Coord Staff, Transmission Forestry 956-267-2567 blthorp@aep.com	Connor W. Grooms Engineer, Trans Line Eng PJM Central 614-271-5013 cwgrooms@aep.com David W. Daniels Engineer Prin, NERC And OT Cyber Engineering 614-716-2191 dwdaniels2@aep.com	

FAC-003-5 Requirement	Description	Content Owner	SMEs	Reviewers
R5.–M5.	Constrained from performing vegetation work	Benjamin L. Thorp III Trans Sys Forestry Coord Staff, Transmission Forestry 956-267-2567 blthorp@aep.com	Connor W. Grooms Engineer, Trans Line Eng PJM Central 614-271-5013 cwgrooms@aep.com David W. Daniels Engineer Prin, NERC And OT Cyber Engineering 614-716-2191 dwdaniels2@aep.com	
R6.–M6.	Complete inspections on 100% of FAC-003 applicable transmission lines	Benjamin L. Thorp III Trans Sys Forestry Coord Staff, Transmission Forestry 956-267-2567 blthorp@aep.com	Connor W. Grooms Engineer, Trans Line Eng PJM Central 614-271-5013 cwgrooms@aep.com David W. Daniels Engineer Prin, NERC And OT Cyber Engineering 614-716-2191 dwdaniels2@aep.com	
R7.–M7.	Complete 100% of annual plan	Benjamin L. Thorp III Trans Sys Forestry Coord Staff, Transmission Forestry 956-267-2567 blthorp@aep.com	Connor W. Grooms Engineer, Trans Line Eng PJM Central 614-271-5013 cwgrooms@aep.com David W. Daniels Engineer Prin, NERC And OT Cyber Engineering 614-716-2191 dwdaniels2@aep.com	

6.0 Appendix C: TVMP Internal Distribution List

Role definitions: A—Accountable; C—Consult; I—Informed; R—Responsible; S—Support

Name/Email Group	Department	Title	Role
Ball, David R.	AEP Transmission Admin	SVP Transmission System Operations	A
Pugh, Archie D.	Trans Field Services East	VP Trans Field Services	A
Wooldridge, Steven J.	AEP Transmission Admin	VP Trans Field Services	A
Robinson, Kevin S. (Shawn)	AEP Transmission Admin	SVP Transmission Project Solutions	A
Patton, Kevin B.	Transmission Forestry	Dir Vegetation Mgmt TFS	A
Ellis, Brian L.	Trans Operation Reliability	Dir Trans Systems Ops Engineering	A
Gabbard, Stacey D.	Customer Operations & Support	VP Customer Operations	A
Dimpfl, Scott S.	Transmission Line Engrg Admin	Dir Trans Engineering Services	S
Miller, Mathew J.	VP Eng Services	Dir Gen Engineering	I
Globeck, Stephen J.	NERC And Regulatory Issues Mgmt	NERC Compliance Mgr	R
Patterson, Aubrey F.	EDS Compliance & Process	ED NERC Compliance Mgr	R
Unternaher, Brenda L.	Transmission Right of Way	Trans Right of Way Mgr	I
Messner, Leah	Transmission Right of Way	Trans Right of Way Mgr	I
Baxter, Robert W.	Transmission Right of Way	Trans Right Of Way Supv	I
Curiel, Nicolas	Transmission Right of Way	Trans Right Of Way Supv	I
Bergeret, Rene J.	Transmission Right of Way	Trans Right Of Way Supv	I
Brown, Deborah L.	Transmission Right of Way	Trans Right Of Way Supv	I
Cline, Erica	Transmission Right of Way	Trans Right Of Way Supv	I
Wellman, Amanda J.	Transmission Right of Way	Trans Right Of Way Supv	I
Smith, Matthew J.	Transmission Right of Way	Trans Right of Way Agent Lead	I
Hannah, Eddie D.	TFS Line East	Director Transmission Field Services	I
Calhoun, Randy L.	VP Eng Services	Gen NERC & OT Cyber Compl Mgr	C

Role definitions: A—Accountable; C—Consult; I—Informed; R—Responsible; S—Support

Name/Email Group	Department	Title	Role
Fuller, Terry A.	New Project Development	Engineer Staff	A
Daniels, David W.	NERC And OT Cyber Engineering	Engineer Prin	R
Murphy, Timothy S.	Day Ahead Operations	Real Time Mkt Ops Mgr	I
Long, Christopher B.	Env Systems & Field Services	Dir Environmental	I
Blake, Frank E.	Environmental Services	Dir Environmental	I
Toole, Aimee R.	Env Programs & Reporting Svcs	Dir Environmental	I
Hale, Michael M.	TFS TS T-Line	Coordinator Prin	I
Martin, Amanda M.	TFS TS T-Line	TFS T-Line Tech Svcs Mgr	I
Kuhns, Kara B.	TFS TS T-Line	Engineer Sr	I
Evans, Jeremy A.	TFS TS T-Line	Engineer Sr	I
Macias, Michael M.	Electric Transmission Texas	Dir Operations ETT	I
Lorcher, Eryn M.	Electric Transmission Texas	Engineer Staff	I
Davis, Craig E.	Cust Sol Ctr Network Services	Dir Customer Care	A
De La Garza, Orlando	Transmission Forestry	Transmission Forestry Mgr	R
Bradburn, Benjamin N.	Transmission Forestry	Trans Sys Forestry Coord Staff	R
Thorp, Benjamin L.	Transmission Forestry	Trans Sys Forestry Coord Staff	R
Karber, Richard L.	Transmission Forestry	Trans Sys Forestry Coord Staff	R
Transmission Forestry Group	Trans Foresters and Forestry Management	Group Mailing List	R
Browning, David L.	Transmission Dispatch	Mng Dir Real Time Response	R
Lopez, Linda L.	Transmission Dispatch	Dir Energy Delivery System Ops	R
McAuley, Rosalyn N.	Transmission Dispatch	Dir Energy Delivery System Ops	R
Martin, Brian R.	Trans Dispatch Roanoke	Eng Del System Ops Mgr	R
Martin, Matthew C.	Roanoke Dist Dispatch	Dist Dispatching Mgr	R
Miller, Eric A.	AEP Ohio Distr Dispatch Admin	Dist Dispatching Mgr	R

Role definitions: A—Accountable; C—Consult; I—Informed; R—Responsible; S—Support

Name/Email Group	Department	Title	Role
Wilson, Jarrod M.	Ft Wayne Distrib Dispatch	Dist Dispatching Mgr	R
Parker, Matthew L.	SWEPCO Distrib Dispatch	Dist Dispatching Mgr	R
Uresti, Adrian D.	C Christi Distrib Dispatch	Dist Dispatching Mgr	R
Albertson, Emmett W.	Transmission Forestry	Trans Sys Forestry Coord Sr	R
McMillan, Todd C.	TransLineEngrg DesignStandards	Engineer Staff	R
Grooms, Connor W.	Trans Line Eng PJM Central	Engineer	R
Coon, Chad M.	Trans Line Eng PJM Central	Engineer	R
Guinn, Jared A.	Trans Line Eng SPP	Engineer	R
Ahmed, Mohammed	Trans Line Eng SPP	Trans Line Engrg Mgr	S
Overduyn, Rebecca M.	Trans Line Eng SPP	Trans Line Engrg Mgr	S
Grawe, Robert V.	Trans Station Engrg Admin	Trans Line Engrg Mgr	S
Earnest, Katherine P.	Trans Line Eng PJM East	Trans Line Engrg Mgr	S
TE_TLE All	Transmission Line Project Engineering	Group Mailing List	S
TE_TLE Standards	Transmission Line Standards Engineering	Group Mailing List	S
Transmission Projects—PMs	Transmission Project Mgt. & Control	Group Mailing List	S
Veith, Matthew S.	Trans Operation Reliability	Mng Dir Trans System Ops Engineeri	S
Sauriol, Dennis R.	Trans Operation Reliability	Mng Dir Real Time Reliability	S
Beasley, Ashley N.	Transmission Projects	Mng Dir Project Solutions	S
Hannah, Eddie D.	TFS Line East	Director Transmission Field Services	S
Stevers, Mary J.	TFS P&C East	Dir TFS	S
Doan, Brandon A.	Trans Operation Reliability	Dir Trans Systems Ops Engineering	S
Trevino, Gerardo	ED Engineering Services Admin	Dir Trans Engineering Services	S
Cantu, Adrian	Trans Construction Mgmt Admin	Mng Dir Energy Del Constr Mgmt	S

Role definitions: A—Accountable; C—Consult; I—Informed; R—Responsible; S—Support

Name/Email Group	Department	Title	Role
Horne, Matthew J.	Trans Constr Mgt Gah PJM AP	Trans Construction Mgr	S
Mau, Dawn M.	Trans Construction Mgmt Gah PJM Ohio	Trans Construction Mgr	S
	Trans Constr Mgmt Gah PJM Ohio	Trans Construction Mgr	S

ATTACHMENT 13

9A West Project
Attachment 13
Agency Coordination

DATE/TIME	COMMUNICATION TYPE	STATE	COUNTY	MUNICIPALITY / OFFICE	CONTACT	TRANSOURCE ATTENDEES	CONSULTANT ATTENDEES	STATE / COUNTY / LOCAL ATTENDEES
January 12, 2017	Meeting	Maryland	State	PPRP	Susan Gray	Peggy Simmons, Laurie Spears, Tim Gaul	Barry Baker (AECOM)	Susan Gray, Fred Kellex, Shawn Seaman, Steve Talson
January 31, 2017	Letter	Maryland	Federal	USACE - Baltimore District MD Northern Section	Joe DaVia - Chief	N/A	N/A	N/A
January 31, 2017	Letter	Pennsylvania	Federal	USACE - Baltimore District	Wade Chandler - Chief	N/A	N/A	N/A
January 31, 2017	Letter	Maryland	Federal	USFWS - Chesapeake Field Office	Genevieve LaRouche	N/A	N/A	N/A
January 31, 2017	Letter	Pennsylvania	Federal	USFWS - Pennsylvania Field Office	Lora Lattanzi	N/A	N/A	N/A
January 31, 2017	Letter	Both	Federal	EPA Region 3	Shawn Garvin - Regional Administrator	N/A	N/A	N/A
January 31, 2017	Letter	Pennsylvania	State	PA Department of Environmental Protection	Joseph Adams - Regional Director	N/A	N/A	N/A
January 31, 2017	Letter	Pennsylvania	State	PA Fish and Boat Commission	John Arway - Executive Director	N/A	N/A	N/A
January 31, 2017	Letter	Pennsylvania	State	PA Game Commission	Bradely Meyers - Director	N/A	N/A	N/A
January 31, 2017	Letter	Pennsylvania	State	PA Department of Conservation and Natural Resources	Ellen Schultzabarger - Division Chief	N/A	N/A	N/A
January 31, 2017	Letter	Pennsylvania	State	PA Historical & Museum Commission	Andra MacDonald - Bureau Director	N/A	N/A	N/A
January 31, 2017	Letter	Pennsylvania	State	PA Department of Agriculture	Doug Wolfgang - Supervisor	N/A	N/A	N/A
January 31, 2017	Letter	Maryland	State	Maryland Department of the Environment	Lynn Buhl - Director	N/A	N/A	N/A
January 31, 2017	Letter	Maryland	State	Maryland Department of Natural Resources	Denise Keehner - Program Manager	N/A	N/A	N/A
January 31, 2017	Letter	Maryland	State	Maryland Historical Trust	Natalie Loukianoff - Preservation Officer	N/A	N/A	N/A
January 31, 2017	Letter	Maryland	State	Maryland Environmental Trust	William Leahy - Executive Director	N/A	N/A	N/A
January 31, 2017	Letter	Maryland	State	Maryland Department of Agriculture	Louise Lawrence - Program Manager	N/A	N/A	N/A
February 6, 2017	Meeting	Maryland	Washington	State Senator	Senator Andrew Serafini	Todd Burns	Rick Abbruzzese, Mary Urban	Senator Andrew Serafini
February 7, 2017	Meeting	Pennsylvania	Franklin	State Senator	Sen. Richard Alloway	Todd Burns & Laurie Spears	Steve Kratz, Dennis Walsh, Margaret Durkin	Sen. Richard Alloway
February 7, 2017	Meeting	Pennsylvania	Franklin	State Representative	Rep. Paul Schemel	Todd Burns & Laurie Spears	Steve Kratz, Dennis Walsh, Margaret Durkin	Rep. Paul Schemel
February 7, 2017	Email Correspondence	Maryland	State	PPRP	Fred Kelly	Laurie Spears	N/A	Email regarding
February 8, 2017	Meeting	Pennsylvania	Franklin	Southampton Township	Maria Misner	Spears	Chris Getman	Maria Misner, Paul Witter
February 8, 2017	Meeting	Pennsylvania	Franklin	Greene Township		Spears	Chris Getman	
February 9, 2017	Conference Call	Pennsylvania	Franklin	State Representative	Rep. Rob Kaufmann	Todd Burns & Laurie Spears	Steve Kratz, Dennis Walsh, Margaret Durkin	Rep. Rob Kaufmann
January 12, 2017	Meeting	Maryland	State	PPRP	Susan Gray	Peggy Simmons, Laurie Spears, Tim Gaul	Barry Baker (AECOM)	Susan Gray, Fred Kellex, Shawn Seaman, Steve Talson

9A West Project
Attachment 13
Agency Coordination

DATE/TIME	COMMUNICATION TYPE	STATE	COUNTY	MUNICIPALITY / OFFICE	CONTACT	TRANSOURCE ATTENDEES	CONSULTANT ATTENDEES	STATE / COUNTY / LOCAL ATTENDEES
February 13, 2017	Conference Call	Pennsylvania	Franklin	Franklin County Planning Office	Phil Tarquino, County Planning Director	Todd Burns & Laurie Spears	Steve Kratz	Phil Tarquino
March 2, 2017	Email Correspondence	Maryland	State	PPRP	Fred Kelly	Laurie Spears	N/A	Email regarding MDE Joint Evaluation Meeting.
March 8, 2017	Meeting	Maryland	Washington	Washington County	Rob Slocum, Director of Engineering & Construction Management	Laurie Spears	Mary Urban, Barry Baker & Dave Yezuita (AECOM)	Rob Slocum
March 8, 2017	Meeting	Pennsylvania	Franklin	Franklin County Planning Office	Phil Tarquino, County Planning Director	Laurie Spears	Baker & Dave Yezuita (AECOM)	Phil Tarquino, Rochelle Barvinchack, Elizabeth Grant
March 10, 2017	Meeting	Maryland	State	Department of Agriculture	Carrol West	Laurie Spears & Tim Gaul	Barry Baker (AECOM)	
March 29, 2017	Meeting	Maryland	Federal/State	MDE Joint Evaluation Meeting	Jonathan Stewart	Peggy Simmons, Laurie Spears & Tim Gaul	Baker & Dave Yezuita (AECOM)	See sign-in sheet over 17 people in attendance from agencies
March 31, 2017	Email Correspondence	Maryland	State	PPRP	Fred Kelly	Laurie Spears	N/A	Email regarding open house landowner notification distance.
April 5, 2017	Meeting	Pennsylvania	Franklin	Rep. Paul Schemel	Rep. Schemel	N/A	Margaret Durkin (BRAVO)	Rep. Schemel
April 10, 2017	Meeting	Pennsylvania	State	PA Department of Agriculture	Doug Wolfgang, Farmland Preservation, Bureau Director	Laurie Spears	Barry Baker & Dave Yezuita(AECOM)	Doug Wolfgang
April 11, 2017	Meeting	Pennsylvania	Franklin	Franklin County Planning Office	Phil Tarquino, County Planning Director	Laurie Spears	Chris Getman, Abby Foster, Barry Baker (AECOM)	Phil Tarquino, Rochelle Barvinchack, Elizabeth Grant
May 2, 2017	Email Correspondence	Maryland	State	PPRP	Fred Kelly	Laurie Spears	N/A	Email regarding May meeting coordination.
May 4, 2017	Meeting	Pennsylvania	Franklin	Southampton Township	Maria Misner, Township Planner	Laurie Spears, Todd Burns	Abby Foster, Barry Baker (AECOM)	Maria Misner (planner), Township Supervisor, Zoning Officer
May 4, 2017	Meeting	Pennsylvania	Franklin	Hamilton Township & Chambersburg Borough	Deb Hollenshead, Secretary/Treasurer and Ron Pezon, Chambersburg Electric Superintendent, Jamia Wright, Chambersburg secretary	Laurie Spears, Todd Burns	Abby Foster, Barry Baker (AECOM)	Deb Hollenshead, Secretary/Treasurer; Randall Negley, Supervisor; Mike Kessinger, Supervisor; Ron Pezon, Chambersburg Electric Superintendent; Jeff Heverley, Chambersburg Electric Assistant; Bill Rudy
May 4, 2017	Meeting	Pennsylvania	Franklin	Guilford Township	Wayne Statler	Laurie Spears, Todd Burns	Abby Foster, Barry Baker (AECOM)	Wayne Statler, Zoning and Don Clapper, Supervisor
May 4, 2017	Meeting	Pennsylvania	Franklin	Greene Township	Gina	Laurie Spears, Todd Burns	Abby Foster, Barry Baker (AECOM)	Todd Burns, Chairman; Sean Corwell, Supervisor; Dan Bachman, Zoning Officer; Greg Lambert, Township Engineer; Travis Brookens, Vice-Chair
May 4, 2017	Meeting	Pennsylvania	Franklin	Antrim Township	Silvia House	Laurie Spears, Todd Burns	Abby Foster, Barry Baker (AECOM)	Sylvia House, Zoning Officer/Code Enforcement; Fred Young, Supervisor
May 4, 2017	Meeting	Pennsylvania	Franklin	Quincy Township	Kerry Brumbaugh, Supervisor, Bob Gunder, Supervisor and Travis Schooley	Laurie Spears, Todd Burns	Abby Foster, Barry Baker (AECOM)	Kerry Brumbaugh, Supervisor, Travis Schooley

9A West Project
Attachment 13
Agency Coordination

DATE/TIME	COMMUNICATION TYPE	STATE	COUNTY	MUNICIPALITY / OFFICE	CONTACT	TRANSOURCE ATTENDEES	CONSULTANT ATTENDEES	STATE / COUNTY / LOCAL ATTENDEES
May 4, 2017	Meeting	Pennsylvania	Franklin	Washington Township	Michael Christopher, Township Manager	Laurie Spears, Todd Burns	Abby Foster, Barry Baker (AECOM)	Michael Christopher, Township Manager; Jeff Geesamen, Assistant Township Manager
May 16, 2017	Meeting	Pennsylvania	Franklin	Federal - Letterkenny	Damian Bess		Barry Baker & Heather Brewster (AECOM)	Bill Tarman - DPW Deputy, Bill Boehmer - Energy Manager, Douglas Warnock - Chief Environmental Management Division, Damian Bess - DPW Director, Scott Yeager - DPW Planning Engineering, Kelly Barnes - DPW Planning Engineering, Walt Findley - DPW Planning Engineering, Jim Coccagna - Chief, Engineering and Planning Division
May 17, 2017	Email Correspondence	Pennsylvania	Franklin	Federal - Letterkenny	Damian Bess		Heather Brewster (AECOM)	
May 22, 2017	Meeting	Maryland	State	PPRP	Don Strebel	Laurie Spears & Tim Gaul	Barry Baker (AECOM)	Don Strebel, Ginny Rogers, Fred Kelly, Connie Faustini, Susan Gray, Kevin (?),
June 19, 2017	Email Correspondence	Maryland	State	PPRP	Fred Kelly	Laurie Spears	N/A	Email regarding information tied to bog turtles in the area of Conastone Substation.
June 22, 2017	Email Correspondence	Maryland	State	PPRP	Fred Kelly	Laurie Spears	N/A	Email regarding coordination of July meeting.
July 6, 2017	Email Correspondence	Pennsylvania	Franklin	PA DCNR - Bureau of Forestry	Roy Brubaker		Heather Brewster (AECOM)	
July 13, 2017	Email Correspondence	Maryland	State	MDE	Kelly Neff	Laurie Spears	N/A	Email requesting information about wetland mitigation site in project area.
July 14, 2017	Meeting	Maryland	State	Department of Agriculture	Carol West	Laurie Spears	Barry Baker (AECOM)	
July 18, 2017	Meeting	Maryland	Washington	County Commissioners			Rick Abburzzese	County Commissioners
July 25, 2017	Meeting	Maryland	State	PPRP	Don Strebel Fred Kelley	Laurie Spears Rachel Anderson	Dave Yezuita (AECOM) Rob Everard (BurnsMac)	Don Strebel, Ginny Rogers, Fred Kelly, Lori Byrne
July 6, 2017	Email Correspondence	Pennsylvania	Franklin	PA DCNR - Bureau of Forestry	Jodi Gribik		Heather Brewster (AECOM)	
July 26, 2017	Meeting	Maryland	Federal/State	MDE Joint Evaluation Meeting	Jonathan Stewart	Laurie Spears Rachel Anderson	Dave Yezuita (AECOM) Rob Everard (BurnsMac)	Amanda Sigillito, Jonathan Stewart, April Field. Andy May, David Walbeck, Lou Parnes, Denise Kechner, Greg Golden, Don Strebel, Dixie Henry, Joseph DaVia, Steve Elinsky, Trevor Clark, Tamene Dilnesahr
August 8, 2017	Meeting at open house	Pennsylvania	Franklin	Franklin County Planning Commission, Franklin	Katie Hess	Laurie Spears, Barry Baker	Abby Foster (Bravo)	Katie Hess, Elizabeth Grant, Janet Pollard
August 16, 2017	Call	Pennsylvania	Franklin	Quincy Township	Kerry Brumbaugh and Travis Schooley		Abby Foster (Bravo)	Travis Schooley and Kerry Brumbaugh
August 17, 2017	Meeting	Pennsylvania	Franklin	State Representative Kauffman			Abby Foster (Bravo)	Rep. Kauffman
August 17, 2017	Meeting	Pennsylvania	Franklin	Congressman Shuster	Nancy Bull, Deputy District Director		Abby Foster (Bravo)	Rep. Rob Kaufmann
August 17, 2017	Meeting	Pennsylvania	Franklin	Franklin County Chamber of Commerce	Doug Harmon, Membership Director		Abby Foster (Bravo)	Nancy Bull, Deputy District Director
August 23, 2017	Email Correspondence	Maryland	Washington	Maryland Dept of Agriculture	Carol West		Heather Brewster (AECOM)	

9A West Project
Attachment 13
Agency Coordination

DATE/TIME	COMMUNICATION TYPE	STATE	COUNTY	MUNICIPALITY / OFFICE	CONTACT	TRANSOURCE ATTENDEES	CONSULTANT ATTENDEES	STATE / COUNTY / LOCAL ATTENDEES
August 30, 2017	Call	Pennsylvania	Franklin	State Senator Eichelberger	Kathleen Gunnell, Legislative Aide		Abby Foster (Bravo)	Kathleen Gunnell, Legislative Aide
August 31, 2017	Email Correspondence	Pennsylvania	Franklin	USDA NRCS - PA	Hathaway Jones		Heather Brewster (AECOM)	
September 6, 2017	Email Correspondence	Maryland	Washington	USDA NRCS - MD	Tiffany Davis		Heather Brewster (AECOM)	
September 7, 2017	Call	Pennsylvania	Franklin	State Senator Alloway	Stacy Gregson, Field Representative		Abby Foster (Bravo)	Stacy Gregson, Field Representative
September 20, 2017	Call	Pennsylvania	Franklin	Franklin County Planning Commission	Phil Tarquino, County Planning Director		Abby Foster (Bravo)	Phil Tarquino
September 20, 2017	Meeting	Pennsylvania	Franklin	State Representative Alloway	Chad Reichard		Abby Foster (Bravo)	Chad Reichard
September 20, 2017	Meeting	Pennsylvania	State	PADCNR Bureau of Forestry - Michaux State Forest	Chris Plank	Laurie Spears	Barry Baker (AECOM) Heather Brewster (AECOM)	Chris Plank, Dave Mong, Roy Brubaker, Rebecca Bowen
September 20, 2017	Email Correspondence	Pennsylvania	Franklin	PADCNR Bureau of Forestry - Michaux State Forest	Chris Plank		Heather Brewster (AECOM)	
September 21, 2017	Open House	Maryland	Washington	Delegate Wivell			Abby Foster (Bravo)	Delegate Wivell (FE Open House)
September 25, 2017	Meeting	Pennsylvania	Franklin	State Representative Paul Schemel	Representative Schemel		Abby Foster, Dennis Walsh, Margaret Durkin (Bravo)	
September 25, 2017	Call	Pennsylvania	Pennsylvania	US Senator Casey	Brooke Souder, Constituent Services		Abby Foster (Bravo)	Brooke Souder
September 28, 2017	Call	Maryland	State	Senator Jennings/Delegate Szeliga		N/A	Rick Abbruzzese (KOFA) Mary Urban (KOFA)	
September 29, 2017	Meeting	Maryland	State	PPRP	Don Strebel Fred Kelley	Laurie Spears	Barry Baker (AECOM) Dave Yezuita (AECOM)	Don Strebel, Ginny Rogers, Fred Kelly, Lori Byrne
October 17, 2017	Call	Pennsylvania	Franklin	Senator Alloway	Jeremy Shoemaker		Abby Foster (Bravo)	Jeremy Shoemaker, COS
October 24, 2017	Meeting Field Review of East Proposed Route	Maryland	State	PPRP	Don Strebel Fred Kelley		Barry Baker (AECOM) Dave Yezuita (AECOM) Rob Everard (BurnsMac)	
November 1, 2017	Letter	Pennsylvania	State	Congress of the United States - House of Representative	Congressman Scott Perry	N/A	N/A	Letter from Congressman Perry regarding the Project.
November 8, 2017	Letter	Pennsylvania	State	USDA NRCS	Hathaway Jones	N/A	N/A	Consultation request for review of West and East proposed routes related to agriculture easements.
November 29, 2017	Letter	Pennsylvania	State	PA Dept Agricultural	Russell Redding	N/A	N/A	Letter from PA Dept Agri regarding the Project and potential impacts to farmland.

9A West Project
Attachment 13
Agency Coordination

DATE/TIME	COMMUNICATION TYPE	STATE	COUNTY	MUNICIPALITY / OFFICE	CONTACT	TRANSOURCE ATTENDEES	CONSULTANT ATTENDEES	STATE / COUNTY / LOCAL ATTENDEES
February 20, 2026	Meeting	Pennsylvania	State	State Senator	Sen. Doug Mastriano	Joe Demaree, Virginia Limmiatis	DelRosso, Elizabeth Rosentel, Carey Sullivan	Rep. Rich Irwin, Rep. Rob Kaufmann, Rep. Chad Reichard, Franklin County Commissioner Dean Horst
February 24, 2026	Meeting	Pennsylvania	State	State Senator	Sen. Doug Mastriano	Joe Demaree, Virginia Limmiatis	DelRosso, Elizabeth Rosentel, Carey Sullivan	Rep. Rich Irwin, Rep. Rob Kaufmann, Rep. Chad Reichard, Franklin County Commissioner Dean Horst
March 3, 2026	Meeting	Pennsylvania	Franklin	County	Commissioner Dean Horst	Joe Demaree, Virginia Limmiatis	DelRosso, Elizabeth Rosentel, Carey Sullivan	Commissioner Dean Horst
March 31, 2026	Meeting	Pennsylvania	Franklin	Chambersburg Area School District	Matthew Varner, Director of Facilities	Joe Demaree		Matthew Varner, Director of Facilities
May 20, 2026	Meeting	Pennsylvania	Franklin	Public Utility Commission	Pre-Filing Meeting with Interested PUC Staff	Transource Staff		

ATTACHMENT 14

APPENDIX A

[insert date]

IMPORTANT INFORMATION ABOUT YOUR PROPERTY
[name and address of property owner]

Subject: Rice-Ringgold "9A West" Project – Pennsylvania Public Utility Commission Required Landowner Notice

Dear [insert name],

You are receiving this letter from Transource Pennsylvania, LLC ("Transource") because public records indicate that you own real property along an overhead electric transmission line route being proposed for the construction of a new aerial high voltage electric transmission line(s) and related substation and facilities (the Rice-Ringgold "9A West Project").

Transource intends to file shortly an application with the Pennsylvania Public Utility Commission ("PaPUC") requesting a new certificate of public convenience ("CPC") to provide electric transmission-only service in portions of Franklin County, Pennsylvania in connection with the 9A West Project. It is unknown at this time if Transource's request at the PaPUC will be granted or approved. Transource currently holds a CPC as a Pennsylvania public utility to provide electric transmission-only service in Peach Bottom Township, York County Pennsylvania.

Transource is providing you this letter and the attached notice (described further below) as if it were an existing public utility in portions of Franklin County, Pennsylvania to ensure you are fully informed of your rights and key information about the 9A West Project for your protection and in accordance with applicable PaPUC regulations.

PJM Interconnection, LLC ("PJM"), the regional transmission organization responsible for managing the high voltage electric grid for the District of Columbia and 13 states, including Pennsylvania and Maryland, has determined and reconfirmed that the 9A West Project is needed to relieve electrical network congestion and, by doing so, to improve market efficiency. PJM has selected Transource to construct a new 29-mile high voltage double-circuit 230 kilovolt ("kV") electric transmission line and related electric substation connecting a new Rice Substation in Franklin County, Pennsylvania to the existing FirstEnergy Ringgold Substation in Washington County, Maryland as part of the 9A West Project. The 9A West Project supports PJM's directives. Construction is anticipated to begin upon the receipt of all necessary regulatory approvals, including those from the PaPUC.

The PaPUC's regulations require certificated public utilities to issue a 15-day landowner notification prior to the start of the right-of-way acquisition process. In the near future, a representative from Transource's Real Estate Department and/or a Transource-authorized agent will be contacting you about acquiring temporary and/or permanent easement interests or other property rights needed for the safe construction, operation, access to and maintenance of the 9A West Project.

Since you are a landowner along the preferred 9A West Project route, please review the enclosed required notices with information about Land Agent Practices, Right-of-Way Maintenance Practices, Eminent Domain Power and Code of Conduct for Right-Of-Way Representatives.

Transource is requesting permission to enter on your land to conduct all necessary field investigations and confirm the viability of the proposed route for construction of the 9A West Project. The activities planned for your property include, among other things, a field survey, soil borings and a variety of environmental, cultural and species related studies. Please review, complete and sign the attached Access Permit - Survey Permission form, and return it in the enclosed self-addressed envelope or by email within 15 days of the date of this letter.

I appreciate your time and hope to hear from you soon.

Thank you,

Abby Abbondanza

Abby Abbondanza
Right-of-Way Agent
Western Land Services, representing Transource Pennsylvania, LLC
1000 Noble Energy Drive, Suite 210
Canonsburg, PA 15317
Phone: (724) 602-1198
Email: abby15301@gmail.com

Enclosures

APPENDIX B

NOTICE

LAND AGENT PRACTICES

PJM Interconnection, LLC ("PJM"), the regional transmission organization responsible for managing the high voltage electric grid for the District of Columbia and 13 states, including Pennsylvania and Maryland, has determined that the 9A West Project is needed to relieve electrical network congestion and, by doing so, to improve market efficiency. PJM has selected Transource to construct a new high voltage double-circuit 230 kilovolt ("kV") electric transmission line and a related electric substation in Pennsylvania as part of the 9A West Project. The 9A West Project is in support of these directives from PJM. Work on the Project will begin upon the receipt of all necessary regulatory approvals, including those from the PaPUC.

Transource requires temporary and permanent easements on and across your property to access and site aerial electric transmission lines and related substation equipment and facilities across your property in connection with the Project. Since a field survey and detailed engineering have not yet been completed for your property, the physical dimensions and precise location of the proposed new aerial electric transmission line, substation and related equipment and facilities to be sited and constructed cannot be precisely determined at this time.

Since the Project construction could affect your property, a representative from Transource will contact you in the near future to discuss Transource's plans as they may affect your property.

Transource is providing you the following contact information, as if it were a public utility in portions of Franklin County, Pennsylvania and was required to do so by the Pennsylvania Public Utility Commission, for concerns you might have at any time regarding the practices of the land agents acting on behalf of Transource in connection with the proposed siting and construction of the 9A West Project.

Pennsylvania Public Utility Commission Bureau of Consumer Services
400 North Street
Keystone Bldg.
Harrisburg PA 17120
1-800-692-7380

Darryl A. Lawrence
Consumer Advocate Pennsylvania Office of Consumer Advocate
555 Walnut Street
5th Floor Forum Place Harrisburg, PA 17101-1923
Phone: 717-783-5048 or toll free 800-684-6560 (PA only)
Fax: 717-783-7152
Email: consumer@paoca.org

APPENDIX C

Notice

Right-Of-Way Maintenance Practices

Transource® Pennsylvania, LLC ("Transource") is providing you the following information, as if it were a public utility in portions of Franklin County and was otherwise required to do so by the Pennsylvania Public Utility Commission, on the RIGHT-OF-WAY MAINTENANCE PRACTICES for overhead electric transmission lines to be constructed as part of the 9A West Project.

The methods currently used by Transource will be made available to you for your inspection upon request. If you wish further information concerning right-of-way maintenance methods, you may contact the person named in the cover letter. You may discuss with this person, either before or during negotiation of the right-of-way agreement, these methods and any other questions you may have about right-of-way maintenance.

Once Transource has constructed an electric transmission line on a right-of-way across your land, it must maintain the right-of-way free of tall-growing trees and brush which might impair the reliability of electric service, the safety of the line, and access to the line or its towers. Transource or its contractors may remove and control tall-growing trees and brush by several methods: hand cutting of trees, limbs, and brush; mechanical cutting with chain saws or motorized cutting machines; and application of herbicide. Transource must confine its maintenance activities to the approved right-of-way across your land, except where tall-growing trees or brush or their root systems grow into the right-of-way from adjoining land and constitute a threat to the electric transmission line and its structures.

If you believe that the maintenance method(s) used by Transource would raise problems with your use of your land adjacent to the right-of-way, it is your responsibility as the landowner to bring this to the attention of Transource before you sign the right-of-way agreement.

Transource has the responsibility to maintain its rights-of-way, and regular maintenance must occur. Although you as the landowner cannot determine whether maintenance will occur, your right-of- way agreement may specify certain conditions on the performance of the maintenance program which are important to you. These conditions can be part of the negotiations between you and Transource for your land since a right-of-way agreement is a legal contract between the landowner and Transource. It is important for you to also understand that the maintenance methods used by Transource may change over time as the costs of maintenance or the methods of performing maintenance change. You may want to specify in your right-of-way agreement that Transource inform you of changes in its maintenance methods or in the maintenance schedule for your land.

The provisions of the right-of-way agreement are enforceable in the local Court of Common Pleas. The right-of-way agreement cannot be enforced by the Pennsylvania Public Utility Commission. Any claims for damage resulting from improper maintenance of the right-of-way must be settled with Transource or its contractors, or addressed in the local Court of Common Pleas at your own expense. The Pennsylvania Public Utility Commission cannot award damages for violations of the right-of-way agreement.

APPENDIX D

NOTICE

EMINENT DOMAIN POWER

Transource® Pennsylvania, LLC ("Transource") is providing you the following information as if it were a public utility in portions of Franklin County, Pennsylvania and was required to do so by the Pennsylvania Public Utility Commission:

PJM Interconnection, LLC ("PJM"), the regional transmission organization responsible for managing the high voltage electric grid for the District of Columbia and 13 states, including Pennsylvania and Maryland, has determined that there is a need to construct a new transmission line project. PJM has selected Transource to construct a new high voltage double-circuit 230 kilovolt ("kV") electric transmission line and a related electric substation in Pennsylvania as part of the 9A West Project. The 9A West Project is in support of these directives from PJM. Work on the Project will begin upon the receipt of all necessary regulatory approvals, including those from the PaPUC.

Transource requires temporary and permanent easements on and across your property to access and site aerial electric transmission lines and related substation equipment and facilities across your property in connection with the Project. Since a field survey and detailed engineering have not yet been completed, the physical dimensions and precise location of the proposed new aerial electric transmission lines and related substation equipment and facilities to be sited and constructed cannot be precisely determined at this time.

Since the routes of the proposed and new interconnecting electric transmission lines and related substation equipment and facilities for the Project presently under consideration could affect your property, a representative of Transource will contact you in the near future to discuss Transource 's plans as they may affect your property. To better prepare you for these discussions and to avoid possible misunderstandings, we want to take this opportunity to inform you of your legal rights and the legal rights and duties of Transource with regard to this Project. You have the right to have legal counsel represent you in these negotiations. You do not have to sign any agreement without the advice of counsel. If you do not know an attorney, you may contact your local bar association.

MUST YOU ACCEPT AN OFFER MADE BY TRANSOURCE FOR YOUR PROPERTY?

No. You may refuse to accept it. However, Transource, if it is granted a Certificate of Public Convenience ("CPC") from the Pennsylvania Public Utility Commission to commence the provision of electric transmission-only service as a public utility in potions of Franklin County, Pennsylvania, will have the power to take property by eminent domain, subject to the approval of the Pennsylvania Public Utility Commission, for the construction of transmission lines if Transource is unable to negotiate an agreement to buy a right-of-way. If your property is condemned, you must be paid "just compensation." "Just compensation" has been defined by the courts in Pennsylvania as the difference between the fair market value of your property before condemnation, unaffected by the condemnation, and the fair market value of your remaining property after condemnation, as affected by the condemnation.

CAN TRANSOURCE CONDEMN YOUR HOUSE?

No. Transource cannot condemn your house or a reasonable "curtilage" around your house. Generally, curtilage includes the land or buildings within 300 feet of your house which are used for your domestic purposes. However, the 300- foot limit does not automatically extend beyond the homeowner's property line.

DO YOU HAVE A RIGHT TO A PUBLIC HEARING IF TRANSOURCE SEEKS TO CONDEMN YOUR PROPERTY?

Yes. If Transource ever seeks to have your property condemned, after and if it is ever granted a CPC from the Pennsylvania Public Utility Commission to commence the provision of electric transmission-only service as a public utility in potions of Franklin County, Pennsylvania, it must first apply to the Pennsylvania Public Utility Commission for a certificate finding the condemnation to be necessary or proper for the service, accommodation, convenience, or safety of the public. The Pennsylvania Public Utility Commission will then hold a public hearing. As the landowner whose property may be condemned, you are a party to the proceeding and may retain counsel, present evidence, and/or testify yourself in opposition to the application for a certification. If you wish to testify at the public hearing, you should make your intention known by letter to Secretary, Pennsylvania Public Utility Commission, 400 North Street, Harrisburg, Pennsylvania 17120.

If and after Transource is ever granted a CPC from the Pennsylvania Public Utility Commission to commence the provision of electric transmission-only service as a public utility in potions of Franklin County, Pennsylvania and the Pennsylvania Public Utility Commission approves Transource 's application for a certificate finding the condemnation is in the public interest, then Transource may proceed before the local Court of Common Pleas to condemn your land. If the Pennsylvania Public Utility Commission denies Transource 's application, it cannot condemn your land. If you retain an attorney to represent you before the Commission, you must do so at your own expense.

The Pennsylvania Public Utility Commission will not decide how much money you should receive if your land is condemned. The only issue the Pennsylvania Public Utility Commission will decide is whether the condemnation serves the public interest. If and after Transource is ever granted a CPC from the Pennsylvania Public Utility Commission to commence the provision of electric transmission-only service in potions of Franklin County, Pennsylvania and the Pennsylvania Public Utility Commission approves Transource 's application for condemnation, the amount of money to which you are entitled will be determined by a local Board of View or the Court of Common Pleas. However, you may at any time make an agreement with Transource as to the amount of damages you are to be paid.

APPENDIX E

Code of Conduct Principles for Employees, Right-of-Way Agents and Subcontractor Employees

Transource® Pennsylvania, LLC (Transource) is dedicated to Code of Conduct principles that respect communities, landowners and the environment when building facilities necessary to deliver reliable electric service to our customers.

Our Code of Conduct applies to all communications and interactions with property owners by all employees, right-of-way agents and subcontractor employees representing Transource and its projects during negotiation of right-of-way and the performance of surveying, environmental assessments and the other activities for the Project on property not owned by Transource.

All representatives of the Project are instructed and expected to follow the Transource Code of Conduct principles as outlined in this document and have received Transource Customer Relations Training specifically created for right-of-way agents.

Code of Conduct Principle I:

All communications for the Project must be based in factual information and made in good faith and adhere to the following standards:

- Do provide maps and documents necessary to keep landowners properly informed.
- Be truthful. Do not make false or misleading statements, or purposely or intentionally misrepresent any fact.
- Be responsive. If you don't know the answer to a question from a property owner confirm that you will investigate the question and provide a timely answer. Follow-up in a timely manner on all commitments to provide additional information.
- Do not send written communication suggesting an agreement when, in fact, an agreement hasn't been reached.
- If information provided is later determined to be incorrect, the Project representative will follow-up with the landowner in a timely manner and provide corrected information.
- Do provide the landowner with appropriate additional contact information if necessary.

Code of Conduct Principle II:

All communications and interactions with property owners and occupants of property must be respectful and reflect fair dealing practices, including:

- Project representatives must promptly identify themselves by showing a company or contractor-issued photo I.D. badge and have it displayed at all times while working on the project.
- Project representatives will promptly identify themselves when contacting a landowner by telephone.
- Project representatives do not engage in behavior that may be considered harassing, coercive, manipulative, intimidating, or causes undue pressure.
- All communications by a property owner, whether in person, by telephone or in writing, in which the property owner indicates that he or she does not want to negotiate or does not want to give permission for surveying or other work on his or her property must be respected and politely accepted without argument. Unless specifically authorized by the Land Acquisition Manager, do not contact the property owner again regarding negotiations or requests for permission.
- When asked to leave a property, promptly leave and do not return unless specifically authorized by the Transource.
- Do obtain written permission from the property owner and tenants to enter property for purposes of surveying or conducting environmental assessments or other activities. Clearly explain to the property owner the scope of work to be conducted based on the permission given. Attempt to notify the occupant of the property each time you enter the property based on this permission. If verbal permission is granted, the agent should record the time and date of the discussion for future reference.
- Do not represent that a relative, neighbor and/or friend supports or opposes the project, even if it's true.
- Do not suggest that any person should be ashamed of or embarrassed by his or her opposition to the Project or that such opposition is inappropriate.
- Do not argue with property owners about the merits of the Project.
- Do not suggest that an offer is "take it or leave it."
- Do not threaten to call law enforcement officers or obtain court orders.
- Do not threaten the use of eminent domain.
- Avoid discussing a property owner's failure to note an existing easement when

- purchasing the property and other comments about the property owner's acquisition of the property.
- Do not give the property owner any legal advice. Instead advise they contact an attorney about any legal matters.
- If threatened, promptly and politely leave the property and report the issue to the Land Acquisition Manager.

Code of Conduct Principle III:

All communications and interactions with property owners and occupants of property must respect the privacy of property owners and other persons, as follows:

- Do not discuss your negotiations or interactions with other property owners or other persons.
- Do not ask relatives, neighbors and/or friends to influence the property owner or any other person.
- Avoid discussions of personal matters about the property owner, others and yourself.

Transource operates with the highest standards of reliability, safety and federal and state compliance. We work with property owners, state regulators, local officials and agencies, customers and communities to ensure a mutually respectful and beneficial outcome.

APPENDIX F

ACCESS PERMIT - SURVEY PERMISSION

9A WEST PROJECT

I/We ("Property Owner of Record") hereby give(s) Transource® Pennsylvania, LLC ("Transource"), its affiliates, agents, employees, contractors and to the appropriate federal, state and local agencies, archeologists, biologists, and/or environmental scientists, permission to enter upon my/our premises identified by property location and/tax parcel ID below ("Property") to conduct civil, environmental, cultural resource surveys, soundings, drillings, appraisals, examination and all other surveys and tests (including the right to drill holes for testing soil and bedrock) on the Property (collectively, the "Survey") deemed necessary by Transource to identify, evaluate or take other action in connection with the proposed electric transmission line route for the Bramah Substation Project.

The Property Owner of Record acknowledges that Transource has the right to trim or cut vegetation on or at the Property necessary for Survey purposes. Transource agrees to timely pay the Property Owner of Record the prevailing market price for standing timber for any marketable trees cut down on the Property in the course of such Survey. Transource will be responsible for any damage done to the Property in the course of the Survey and further agrees to indemnify and hold harmless the Property Owner of Record against all liability to third persons caused by negligent acts or omissions of Transource's employees or representatives while on the Property.

Property Location/Tax Parcel ID: _____

Date: _____

Property Owner of Record: _____

_____ _____

(Signature) (Signature)

_____ _____

(Name) (Name)

Mailing Address: _____

(Address) (City) (State) (ZIP)

_____ _____

(Preferred Contact Number) (Alternate Number/Method of Contact)

_____

(E-Mail Address)

TRANSOURCE

SPECIAL CONDITIONS FORM

Property Owner(s): _____ _____

(Print Name) (Print Name)

Property Address: _____, _____, _____ _____

(Address) (City) (State) (ZIP)

ROW Information Checklist

Please identify items which are present on, under or across this property.

- ☐ Water Wells/Septic Systems
- ☐ Springs, Creeks, Marsh, Bog, Wetland
- ☐ Septic/Sewer Lines
- ☐ Sprinklers/Irrigation Systems
- ☐ Drainage Tiles
- ☐ Wells – Water, Gas, Petroleum
- ☐ Water Line(s)
- ☐ Pipelines – Gas, Oil, Petroleum, Steam
- ☐ Buried Cables – Electrical
- ☐ Buried Cables – Communication, Alarm, Signal
- ☐ Invisible Pet Fence
- ☐ Electrical Fence
- ☐ Livestock, Animals
- ☐ Planted Crops
- ☐ Mining
- ☐ Residences
- ☐ Property Corner Markers
- ☐ Cemetery, Burial Grounds
- ☐ Access Roads
- ☐ Cultural or Historical
- ☐ _____
- ☐ _____

COMMENTS:

ATTACHMENT 15

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 Associated with the 9A West Project in Portions of Franklin County, Pennsylvania	: : : : : : :	Docket No. A-2026-_____

NOTICE OF FILING

Transource Pennsylvania, LLC ("Transource PA") hereby submits Notice that the above-captioned Application was filed with the Pennsylvania Public Utility Commission ("Commission") on May 21, 2026. The purpose of the Application is to seek Commission approval of the siting and construction of the Pennsylvania portion of the Rice-Ringgold 230 kV Transmission Line in portions of Franklin County, Pennsylvania. Pursuant to 52 Pa. Code § 57.74(c), you are receiving this Notice because you are the record owner of property within the proposed right-of-way, or represent a Federal, state or local entity identified under 52 Pa. Code § 57.74(c). You are not required to appear or participate in this matter, but you may request Commission permission to intervene.

OVERVIEW OF THE PROJECT

The proposed Rice-Ringgold 230 kV Transmission Line is part of the 9A West Project ("Project") approved by PJM Interconnection, L.L.C. ("PJM") to alleviate electrical network congestion constraints in Pennsylvania, Maryland, West Virginia, and Virginia.[1]

[1] Congestion occurs on transmission facilities when there is heavy use of the transmission system in a specific area. When congestion occurs, typically lower-priced energy is prevented from flowing freely to a specific area on the grid because heavy

The Project approved by PJM involves, among other things, the construction of one new overhead double-circuit 230 kV interstate transmission lines: (1) the Rice-Ringgold 230 kV Transmission Line or the 9A West Project.

Transource PA is obligated to construct the Pennsylvania portion of the 230 kV transmission line associated with the 9A West Project. Through the above-captioned Application, Transource PA seeks Commission approval of the siting and construction of the Pennsylvania portion of the 230 kV line associated with the 9A West Project.

Subject to the Commission's approval, construction of the 9A West is scheduled to begin as soon as practicable following Commission approval to meet an in-service date of January 19, 2029.

ROUTE FOR THE 9A WEST PROJECT

Transource PA undertook a detailed siting analysis of feasible alternatives for the 9A West Project. The goal of the siting analysis was to determine the most suitable route for a new 230 kV transmission line to connect the existing Ringgold Substation located near Smithsburg, Washington County, Maryland to the new Rice Substation to be located in Franklin County, Pennsylvania.

The feasible Alternative Routes were compared and a Proposed Route was selected based upon a detailed analysis and balance of human/built concerns, environmental impacts, and engineering and constructability considerations. Based on this detailed evaluation process, Transource PA selected "Alternative Route C" as the Proposed Route for the 9A West Project because it was the overall best alternative to minimize potential impacts of the transmission line.

electricity use is causing parts of the grid to operate near its limits. As a result, congestion generally raises the pricing for electricity in congested areas.

The Proposed Route extends approximately 27.9 miles (approximately 23.5 miles in Pennsylvania and approximately 4.4 miles in Maryland). A general description of the Proposed Route is provided below:

- Proposed Route exits the Rice Substation from the southeast corner and spans 0.2 miles east over the active Norfolk Southern railroad and to the east side of I-81, where it turns to the south to parallel I-81 for 1.1 miles to SR 696. Along this stretch the route crosses Pine Stump Road, Mountain Run (CWF), and is within 0.5 miles of the Rocktop Airport that is located to the east past SR 696.

- Proposed Route turns sharply east to cross SR 696 perpendicularly and travels approximately 0.6 mile to the east-southeast through an agricultural field before turning sharply to the southwest.

- Travelling southwest for 0.7 miles, the Proposed Route crosses Phillaman Run (CWF) and then crosses Black Gap Road (SR 997) in a perpendicular fashion. The Proposed Route traverses for 0.6 miles around the perimeter of the Chambersburg Mall, generally following the outer edge of the parking lot on the northern and eastern sides of the mall, and then heading west to parallel with I-81 again.

- After reaching the eastern side of I-81, the Proposed Route turns sharply south and parallels the interstate for approximately 1.4 miles and at this location I-81 and the route generally travel in a western direction. Along this section, the Proposed Route traverses the edge of agricultural fields and crosses an unnamed stream (CWF) and the Conococheague Creek (CWF).

- Proposed Route turns sharply to the southwest and travels 0.4 miles until it reaches the existing FE Letterkenny-Grand Point 138 kV transmission line. The route stays to the east of this system and parallels it south for approximately 1.6 miles toward U.S. Route 30, spanning along agricultural fields, around the Grand Point Substation, and over Walker Road. The Lost Acres Airport is located approximately 0.6 miles west of the route.

- Prior to crossing commercial building-lined U.S. Route 30, the Proposed Route first crosses over to the west side of the transmission line, which is now the FE Grand Point-Allegheny Energy 138 kV line and then spans the highway. The route turns sharply west and then south for 0.5 miles spanning across a parking lot and bypassing around a commercial building. After going around the building, the route again parallels the FE Grand Point-Allegheny Energy 138 kV line for 0.5 mile.

- Proposed Route deviates from the transmission line corridor for 1.1 mile to bypass around homes along the line. Along this section, the route extends to the southwest and spans Falling Spring Branch (HQ-CWF) stream, crosses Falling Spring Road, and traverses through a forested area where homes are present to the east. Within the forest,

the route turns south, travels across an agricultural field and spans the FE Grand Point-Allegheny Energy 138 kV line near Henry Lane.

- After crossing this road, the Proposed Route extends to the southeast for approximately 4.6 miles over agricultural fields to Yohe Road, where it intersects with the FE Fayetteville-West Waynesboro 138 kV transmission line. This section involves crossing two unnamed WWF streams, one CWF stream, several local roadways, and the FE Fayetteville-Allegheny 69 kV line.

- As the Proposed Route crosses Yohe Road, it also spans to the east side of the FE Fayetteville-West Waynesboro 138 kV transmission line and then turns sharply to the south to parallel this existing line for approximately 1.7 miles; an unnamed CWF stream is crossed in this section, as is Stamey Hill Road.

- A 0.6 mile deviation from the colocation is required in the vicinity of the Manheim Road crossing due residential development that has built up adjacent to the transmission line, and the route then parallels the existing line for 0.5 miles on the eastern side.

- At Hess Benedict Road, the Proposed Route crosses over to the west side of the FE Fayetteville-West Waynesboro 138 kV transmission line to avoid agricultural and residential structures. The route parallels the line for another 3.7 miles, traversing agricultural fields, crossing Orphanage Road, Wayne Highway (SR 316), and Buchanan Trail East (SR 16), as well as an unnamed CWF stream.

- After crossing SR 16 and spanning the FE Antrim-West Waynesboro 69 kV lines, the Proposed Route turns sharply to the west and parallels this line for approximately 0.4 miles. This stretch includes a crossing of Cold Springs Road and an unnamed CWF stream.

- Turning to the south and then east, the Proposed Route extends for 1.2 miles to Marsh Road. The route traverses an agricultural field to avoid agricultural and residential structures, and crosses an unnamed CWF stream, the FE Reid-West Waynesboro 69 kV line, and the FE Ringgold-West Waynesboro 138 kV line.

- After crossing Marsh Road and an unnamed CWF stream, the Proposed Route turns sharply south to parallel the east side of the FE Ringgold-West Waynesboro 138 kV line for 2.1 miles. The Proposed Route crosses agricultural fields, Hagerstown Road (SR 316), the FE West Waynesboro-East Waynesboro 138 kV line, and the West Branch Antietam Creek (CWF) along this stretch. The route extends away from the transmission line corridor to avoid residential structures near the southern end of this section prior to crossing Lyons Road.

- Spanning to the west side of the FE Ringgold-West Waynesboro 138 kV line, the Proposed Route turns south and crosses the Pennsylvania/Maryland state line. The route generally parallels the transmission line for approximately 2.6 miles until it intersects with Gardenhour Road. Some deviations are required along this stretch to

avoid agricultural operations and structures. The route in this section crosses Rocky Forge Road, Ringgold Pike (SR 418), Poplar Grove Road, and Newcomer Road, as well as numerous crossings of various tributaries to Little Antietam Creek.

- Proposed Route crosses Gardenhour Road paralleling the existing transmission line for 0.4 miles and traverses through an orchard.

- Proposed Route extends out for 0.6 miles to the southwest from the transmission line to bypasses around residential structures along Rowe Road and traverses agricultural lands before spanning over to the south side of the FE Reid-Ringgold 138 kV transmission line.

- Proposed Route turns east for 0.7 miles and extends into the southeastern corner of the Ringgold Substation, spanning the FE Ringgold-East Hagerstown 138 kV transmission line and Smithsburg Pike (MD 64) along the alignment.

The right-of-way for the 9A West Project is 130 feet in width, but may vary in certain areas in order to accommodate environmental, engineering, and constructability issues, as well as ensure compliance with required clearances. There are a total of 102 different owners (85 in Pennsylvania) of 129 deeded properties (108 in Pennsylvania) along the route selected for the proposed 9A West Project. Transource PA will continue to negotiate with all affected landowners in an effort to reach a reasonable and mutually acceptable right-of-way agreement and, thereby, avoid the need to condemn rights-of-way across the properties traversed by the 9A West Project.

MAP

A map showing the transmission line route recommended by Transource for the 9A West Project is enclosed.

EXAMINATION

A complete copy of the Application for the 9A West Project is available for examination during ordinary business hours at the following locations:

Alexander Hamilton Memorial Free Library
45 E Main Street
Waynesboro, PA 17268

Mont Alto Campus Library (Penn State Library)
1 Campus Drive
Mont Alto, PA 17237

Coyle Free Library
102 North Main Street
Chambersburg, PA 17201

PARTICIPATION

You are not required to appear or participate in this matter, but you may request Commission permission to intervene. To intervene as a formal party to this proceeding, you should file a petition to intervene with the Secretary of the Pennsylvania Public Utility Commission at P.O. Box 3265 Harrisburg, Pennsylvania 17105-3265. The petition to intervene should state your alleged right or interest to participate in the formal proceeding, the grounds of the proposed intervention, and your position regarding the issues in the formal proceeding. A copy of the petition to intervene should be served on the undersigned counsel for Transource PA.

QUESTIONS

In the event you have any questions concerning the proposed 9A West Project but do not wish to participate as a formal party to the proceeding, you can obtain additional information by: 1) going to the 9A West Project website at https://transourceenergyprojects.com/rice-ringgold/, 2) emailing your questions to Outreach@TransourcePA-MD.com or 3) calling 717-229-7043.

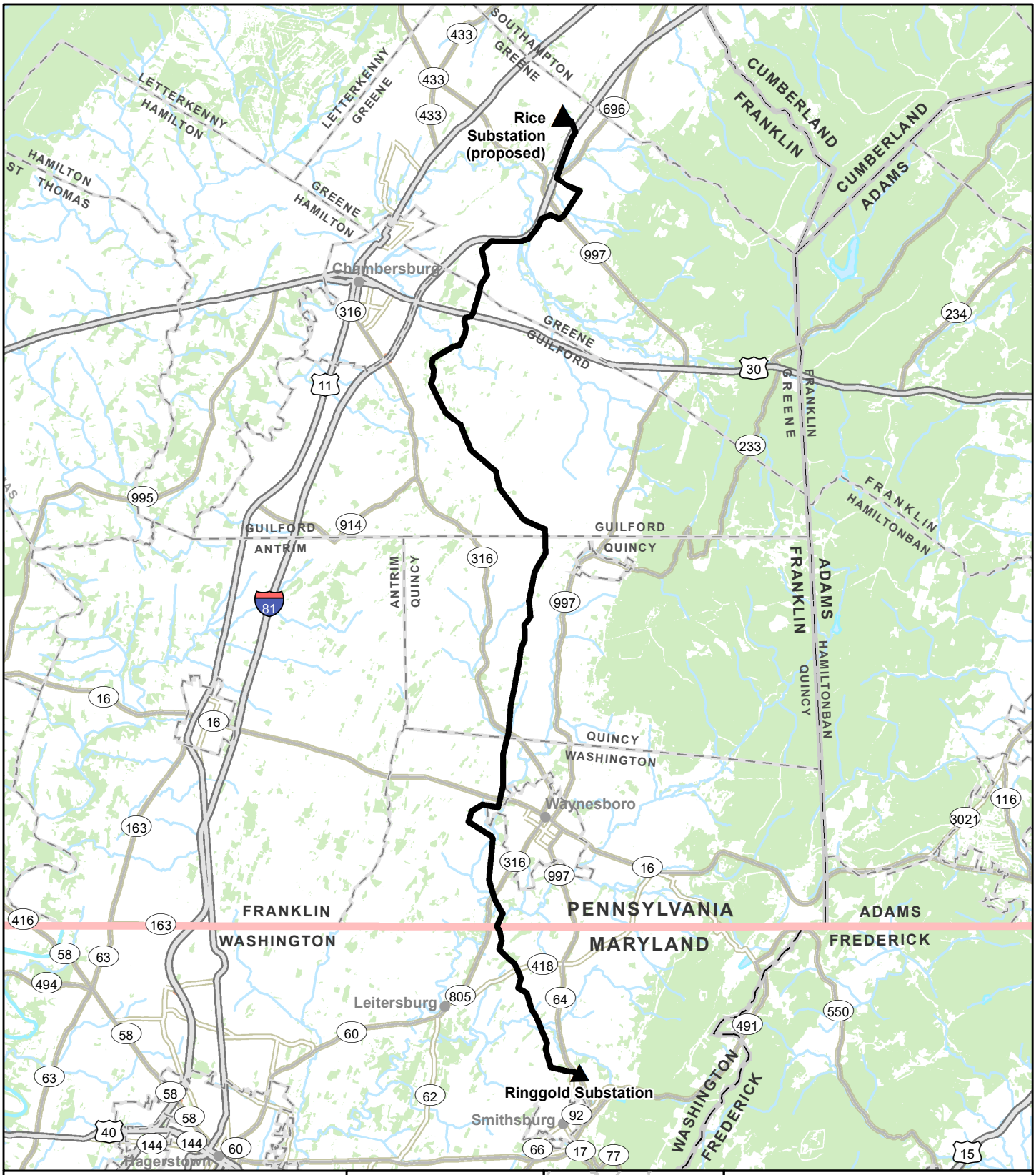
Respectfully submitted,

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

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

Date: May 21, 2026

Attorneys for Transource Pennsylvania, LLC



- Substation
- Alternative Route C (Proposed Route)
- Highway
- Road
- Stream
- Forest Cover

Data Sources: Transource (2026), Rextag Electric Transmission (2021), NLCD Forest Cover (2024)

Coordinate System:
UTM Zone 18N
NAD 83

May 11, 2026



Figure 1
Proposed Route

Rice - Ringgold 230 kV Transmission Line Project

TRANSOURCE

0 1 2 3 4
Miles

VERIFICATION

I, Evan K. Dean, Managing Director, Transmission Joint Ventures Governance and Operations, hereby state that the facts set forth above 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).

Date: May 21, 2026

By: _____

Evan K. Dean, Managing Director
Transmission Joint Ventures Governance
and Operations

BEFORE THE
PENNSYLVANIA PUBLIC UTILTIY 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 Associated with the 9A West Project in Portions of Franklin County, Pennsylvania	:	Docket No. A-2026-_____

NOTICE OF FILING CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served a copy of the Notice of Filing for the 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 Associated with the 9A West Project in Portions of Franklin County, Pennsylvania on the following persons in the manner specified in accordance with the requirements of 52 Pa. Code §1.54:

Via Certified Mail, Return Receipt Requested:

U.S. Army Corps of Engineers
Baltimore District-(Pennsylvania Section)
Regulatory Branch
1631 South Atherton Street
Suite 101
State College, PA 16801-6260
Contact: Wade Chandler, Chief
Pennsylvania Section

U.S. Fish and Wildlife Service
PA Field Office Northeast Region
110 Radnor Road, Suite 101
State College, PA 16801
Contact: Jodie Mamuscia, Field Office Supervisor

U.S. Environmental Protection Agency – Region 3
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2029
Contact: Amy Van Blarcom-Lackey, Regional Administrator

Pennsylvania Department of Transportation
Keystone Building
400 North Street., Fifth Floor
Harrisburg PA 17120
Contact: Mike Carroll, Secretary of Transportation

Pennsylvania Department of Conservation and Natural Resources
400 Market Street, 6th floor
Rachel Carson State Office Building
Harrisburg, PA 17105
Contact: Seth Cassell, State Forester

Pennsylvania Department of Environmental Protection
Southcentral Regional Office
909 Elmerton Avenue
Harrisburg, PA 17110
Contact: Robert DiGilarmo, Regional Director

Pennsylvania Fish and Boat Commission
1601 Elmerton Avenue
Harrisburg, PA 17106
Contact: Timothy D. Schaeffer, Executive Director

Pennsylvania Game Commission
8627 William Penn Highway
Southcentral Region
Huntingdon, PA 16652
Contact: Seth Mesoras, Director

Pennsylvania Department of Agriculture
2301 North Cameron Street
Region 6, Room 403
Harrisburg, PA 17110
Contact: Russell Redding, Secretary of Agriculture

Pennsylvania Historical & Museum Commission
400 North Street, 2nd floor
Commonwealth Keystone Building
Harrisburg, PA 17120
Contact: Andrea L. MacDonald, Bureau Director

Milton E. Rotz
Stacey R. Rotz
0 Pine Stump Road
Chambersburg, PA 17202

Jonathan L. Buchert
217 E. Bethesda Road
Barleson, TX 76028

Alan O. Etter
3670 White Church Road
Chambersburg, PA 17202

Joshua L. Diller
Nicole M. Diller
4913 Olde Scotland Road
Shippensburg, PA 17257

Roger L. Diller
Joyce E. Diller
5505 Olde Scotland Road
Shippensburg, PA 17257

Aaron Kauffman
4220 Olde Scotland Road
Chambersburg, PA 17202

Forrester Farms II
3162 White Church Road
Chambersburg, PA 17202

IESI PA Blue Ridge Landfill
P.O. Box 399
Scotland, PA 17254

Kevin L. Gayman
Faye I. Gayman
11132 Tanyard Hill Road
Orrstown, PA 17244

Chambersburg Mall Realty LLC, et al
150 Great Neck Road
Great Neck, NY 11021

Edward Rotz
Marlin Rotz
205 Mt. Union Road
Fayetteville, PA 17222

Fred J. Byers
1863 Coldsmith Road
Shippensburg, PA 17257

Elam H. Reiff
Mary Z. Reiff
275 Goodhart Road
Shippensburg, PA 17257

Lemma & O'Connor Investors LLC
3272 St. Andrews Drive
Chambersburg, PA 17202

Keith H. Benedict, et al
3865 Henry Road
Chambersburg, PA 17202

Karen S. Wildeson
2778 Mont Alto Road
Chambersburg, PA 17202

Lois M. White
1406 Walker Road
Chambersburg, PA 17202

Derek Benedict et al
1883 Ragged Edge Rd
Chambersburg, PA 17202

Marlin Wingert
Marilyn Wingert
1550 Walker Road
Chambersburg, PA 17202

Joel R. Mower
683 Mower Road
Chambersburg, PA 17202

Forrester Family Farms LLC
3162 White Church Road
Chambersburg, PA 17202

GBR Lincoln Highway Limited
150 White Plains Road
Tarrytown, NY 10591

Patriot Federal Credit Union
800 Wayne Avenue
Chambersburg, PA 17202

Lowe's Home Centers
1000 Lowes Boulevard
Mooresville, NC 28117

Donald L. Martin
Denise M. Martin
1946 Newcomer Road
Chambersburg, PA 17202

Guilford Water Authority
115 Spring Valley Road
Chambersburg, PA 17202

Chambersburg Area School District
511 South Sixth Street
Chambersburg, PA 17201

Allen A. Stine
867 Cider Press Road
Chambersburg, PA 17202

Smith Properties
P.O. Box 2013
Chambersburg, PA 17202

Richard L. Lesher
Agnes M. Lesher
1126 Cider Press Road
Chambersburg, PA 17202

Allen W. Rice
Lori C. Rice
1430 Henry Lane
Chambersburg, PA 17202

Nevin P. Wenger
Raedella A. Wenger
2249 Newcomer Road
Chambersburg, PA 17202

Willis M. Lesher Partnership
1153 Swamp Fox Road
Chambersburg, PA 17202

Colby S. Nitterhouse
Leah A. Nitterhouse
2479 Newcomer Road
Chambersburg, PA 17202

Roger A. Garber
Margaret L. Garber
2815 Newcomer Road
Chambersburg, PA 17202

Donald L. Martin
Denise M. Martin
1946 Newcomer Road
Chambersburg, PA 17202

Ivan H. Benedict
Ruby E. Benedict
3307 College Drive
Chambersburg, PA 17202

Ivan D. Horst
Ellen M. Horst
2637 Sollenberger Drive
Chambersburg, PA 17202

Jason M. Hostetter
Rosalie J. Hostetter
2048 Guilford Station Rd
Chambersburg, PA 17202

Fred E. Rice
Doreen K. Rice
3210 Church Road
Chambersburg, PA 17202

Roy M. Cordell
Emma L. Cordell
4690 Fetterhoff Chapel Rd
Chambersburg, PA 17202

Daniel W. Benedict
Clara Sue Benedict
4574 Altenwald Road
Waynesboro, PA 17268

Daniel R. Strite
Doreen F. Strite
6032 Buttermilk Road
Waynesboro, PA 17268

Donald L. Martin
Denise M. Martin
1946 Newcomer Road
Chambersburg, PA 17202

Brian D. Brechbill
Michelle L. Brechbill
3820 Fetterhoff Chapel Rd
Chambersburg, PA 17202

Mark E. Gayman
11742 Gehr Road
Waynesboro, PA 17268

Jonathan P. Baker
Rosalie M. Baker
9380 Five Forks Road
Waynesboro, PA 17268

Mark E. Gayman
Sally A. Gayman
5460 Stamy Hill Road
Waynesboro, PA 17268

Mahlon R. Eby
Debra S. Eby
6685 Anthony Highway
Waynesboro, PA 17268

John V. Rudolph
Eunie Rudolph, Jr.
7270 Buttermilk Road
Waynesboro, PA 17268

Rodney A. Meyer
5413 Manheim Road
Waynesboro, PA 17268

Lamar V. Rudolph
Edna F. Rudolph
5401 Manheim Road
Waynesboro, PA 17268

Harlan D. Hess
Carrie E. Hess
8200 Helman Road
Waynesboro, PA 17268

Robert T. Morgan
Judith A. Morgan
5516 Manheim Road
Waynesboro, PA 17268

Stephen L. Martin
Esther N. Martin
6000 Manheim Road
Waynesboro, PA 17268

Marlin L. Martin
Carrie R. Martin
8686 Pleasant Ridge Road
Harrisonville, PA 17228

John A. Steiger
Allison F. Steiger
5465 Hess Benedict Road
Waynesboro, PA 17268

Roy B. Biesecker
Susan L. Biesecker
8410 Wayne Highway
Waynesboro, PA 17268

Brethren United Orphanage
6596 Orphanage Road
Waynesboro, PA 17268

Roy S. Martin
Regina F. Martin
4913 Shady Lane
Waynesboro, PA 17268

DC Farms LLC
13689 Dream Highway
Newburg, PA 17240

Charles W. Mellott
9702 Wayne Highway
Waynesboro, PA 17268

Daniel S. Long
6405 Nunnery Road
Waynesboro, PA 17268

Albert L. Horst
Brenda K. Horst
5967 Tick Ridge Rd
Waynesboro, PA 17268

John E.N. Blair
11611 Prices Church Road
Waynesboro, PA 17268

Trademark Development Corp.
9932 Mentzer Gap Road
Waynesboro, PA 17268

Jane M. Zaiger
10329 Wayne Highway
Waynesboro, PA 17268

Denver N. Martin
Katrina J. Martin
6973 Nunnery Road
Waynesboro, PA 17268

Ronald P. Stoner
Doris M. Stoner
12477 Cold Springs Rd.
Waynesboro, PA 17268

Jack E. Martin
Emily L. Martin
12574 Polktown Road
Waynesboro, PA 17268

Joseph N. Weagley
6413 Marsh Road
Waynesboro, PA 17268

Owls Club Incorporated
87 West Main Street
Waynesboro, PA 17268

Daniel J. Eshleman
Elaine J. Eshleman
13868 N. Hoovers Mill Rd
Waynesboro, PA 17268

Norman J. Diller
Bonna J. Diller
20660 Millers Church Rd
Hagerstown, MD 21742

Merlin D. Eshleman
Renee Eshleman
14089 N. Hoovers Mill Rd
Waynesboro, PA 17268

Laverne Martin
Ellen Martin
14578 Wayne Highway
Waynesboro, PA 17268

Leslie Fahrney
915 Park Street
Waynesboro, PA 17268

Mary Ann Fox
6977 Iron Bridge Road
Waynesboro, PA 17268

Jack F. Martin et al
12574 Polktown Road
Waynesboro, PA 17268

Bruce I. Neibert Jr.
14819 Wayne Highway
Waynesboro, PA 17268

Andrew L. Carr
Sherri R. Carr
14808 Wayne Highway
Waynesboro, PA 17268

Gerald L. Zeigler
Jennifer S. Zeigler
14924 Wayne Hwy
Waynesboro, PA 17268

Tunde T. Tijani
503 Brookview Drive
Greencastle, PA 17225

Samuel A. Jones
Mandy L. Jones
7583 Lyons Road
Waynesboro, PA 17268

Kyle E. Schindel
Kelly A. Schindel
22032 Rocky Forge Road
Hagerstown, MD 21740

Myron J. Miller
Fern L. Miller
9180 Goods Dam Road
Waynesboro, PA 17268

Clarence W. Cook Jr.
22236 Ringgold Pike
Hagerstown, MD 21742

Louise E. Messler
22235 Ringgold Pike
Hagerstown, MD 21742

Leroy M. Hostetter
22001 Grove Road
Hagerstown, MD 21742

Richard A. Newcomer
13811 Poplar Grove Road
Hagerstown, MD 21742

Samuel C. Hunter
13651 Newcomer Road
Hagerstown, MD 21742

John S. Martin
22632 Gardenhour Road
Smithsburg, MD 21783

Paul A. Baker
22622 Gardenhour Road
Smithsburg, MD 21783

Boyd E. Frushour Jr.
22614 Gardenhour Road
Smithsburg, MD 21783

Gardenhour Orchards Inc.
P.O. Box 275
Smithsburg, MD 21783

William G. Gardenhour III
22511 Gardenhour Road
Smithsburg, MD 21783

Strite Family Enterprises
21640 Leitersburg Smithsburg Rd
Hagerstown, MD 21742

Richard Lee Grove
13001 Rowe Road
Smithsburg, MD 21783

Anne C. Winters
2934 Hamaker Lane
Smithsburg, MD 21783

Brocroft Kennels LTD
12936 Bradbury Ave
Smithsburg, MD 21783

Potomac Edison Co (First Energy)
Tax Dept
800 Cabin Hill Dr
Greensburg, PA 15601

James P. Mace
12908 Bikle Road
Smithsburg, MD 21783

Date: May 21, 2026

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

STATEMENT 1

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 County, Pennsylvania	: : : : : : : :	Docket No. A-2026-_____

Transource Pennsylvania, LLC
Project 9A West

Statement No. 1

Direct Testimony of
Evan K. Dean

Topics Addressed: **Description of Siting Application Testimony and Exhibits; Description of Transource Pennsylvania, LLC; Summary of 9A West Project; Process to Develop 9A West Project, Siting Application Components and Related Filings; Construction, Operations and Maintenance of the 9A West Project; Status of Right-of-Way Acquisitions; and CPC Application**

Dated: May 21, 2026

I. INTRODUCTION

Q. Please state your full name and business address.

A. My name is Evan K. Dean. My business address is 8500 Smiths Mill Road, New Albany, OH 43054.

Q. What is your position at American Electric Power ("AEP")?

A. I am employed by American Electric Power Service Corporation ("AEPSC") as the Managing Director, Transmission Joint Ventures Governance and Operations. In this capacity I provide services to Transource Energy, LLC ("Transource Energy"), the parent of Transource Pennsylvania, LLC ("Transource PA" or the "Company").

Q. Please briefly describe your primary areas of responsibility as Managing Director, Transmission Joint Ventures Governance and Operations.

A. As Managing Director, Transmission Joint Ventures Governance and Operations, I serve as the primary governance liaison between AEP and its joint venture partners, boards, and regulatory bodies; negotiate and manage joint venture agreements, operational protocols, and commercial terms; lead development and execution of joint venture governance frameworks, including board reporting, compliance, and operating protocols; shape and align long-term joint venture strategy with AEP's company-wide transmission growth objectives and regulatory commitments; provide executive oversight of joint venture operational performance, including reliability, asset management, compliance, and system planning; drive performance metrics, benchmarking, and continuous improvement across joint venture operations; lead engagement with state and federal regulatory agencies related to joint venture governance, planning, and operations; represent AEP in industry forums, RTO/ISO working groups, and stakeholder processes related to joint venture activities; and

monitor and assess regulatory and policy developments impacting joint venture operations or future opportunities.

Q. Please briefly describe your prior educational background and business experience.

A. I earned a Bachelor's degree in Business Administration from The Ohio State University and a Juris Doctor from Capital University Law School. I am a member of the Ohio Bar, the US District Court for the Southern District of Ohio, and U.S. Court of Appeals for the DC Circuit. Previously, I was employed by FirstEnergy Service Company ("FirstEnergy") from August 2013 to June 2025. As Senior Corporate Counsel at FirstEnergy, I represented FirstEnergy affiliates on electric transmission rate and policy issues, secured regulatory approvals for asset acquisitions and sales, supported wholesale power market initiatives, secured regulatory approvals for debt and equity, and Uniform System of Accounts issues. Previously, I was Manager, State Regulatory Outreach for the Edison Electric Institute ("EEI") where I managed outreach to state utility regulators officials on federal energy policy issues. I also worked for the North American Reliability Corporation in Compliance Enforcement.

Q. What is the subject matter of your direct testimony?

A. My testimony addresses the following subjects:

- An overview of the testimony and Attachments filed by Transource PA in support of the Siting Application that has been filed with the Pennsylvania Public Utility Commission ("Commission" or "PUC").
- A description of Transource PA and other related entities.
- A brief overview of the 9A West Project ("9A West Project").
- A summary of the process to develop the 9A West Project, Siting Application components and related filings.

- An explanation of how Transource PA will oversee the construction, operation, and maintenance of the 9A West Project.

- An update on the status of Transource PA's right-of-way acquisitions for the 9A West Project.

- A summary of the CPC Application, including why Transource PA meets the requirements for issuance of a CPC to commence service as an electric transmission-only public utility in Franklin County, Pennsylvania as requested in the CPC Application under Chapter 11 of the Public Utility Code, 66 Pa. C.S. §101 *et seq.* ("Code").

Finally, I note that all of the testimony and Attachments being submitted in connection with Transource PA's Siting Application should be considered to be in support of Transource PA's CPC Application. As noted above, the CPC Application was filed simultaneously with the Siting Application, and a Petition for Confirmation of an Exemption from Local Zoning Regulation and for the Construction of Buildings ("Zoning Petition"). Transource PA has requested that the Applications and Zoning Petition be consolidated for hearing and disposition by the Commission.

II. DESCRIPTION OF THE TESTIMONY AND EXHIBITS

Q. Please describe the Siting Application filed by Transource PA in this proceeding.

A. As explained below, the 9A West Project involves: (i) construction of the Rice Substation, and (ii) construction of the Rice-Ringgold 230 kV Transmission Line, both in Franklin County, Pennsylvania. Through this Siting Application, Transource PA seeks Commission approval to site and construct the 9A West Project.

The 9A West Project involves the construction of the new Rice-Ringgold 230 kV Transmission Line that extends approximately 29 miles, connecting the existing Ringgold Substation located near Smithsburg, Washington County, Maryland, and the new Rice Substation to be located in Franklin County, Pennsylvania. The Siting Application

provides, among other things, an overview of the 9A West Project, an explanation of the need for the 9A West Project, a summary of the process of selecting the Proposed Route for the transmission line associated with the 9A West Project, a description of the Proposed Route for the 9A West Project, and a description of the design and safety of the transmission line.

Q. Please describe the Attachments filed with the Siting Application.

A. Accompanying the Siting Application are several Attachments, including an aerial map that shows the transmission line route selected by Transource PA for the proposed 9A West Project. The Attachments to the Siting Application include the following:

- Attachment 1 Commission Regulation Cross-Reference Matrix
- Attachment 2 Necessity Statement
- Attachment 2.1 Map and Electrical Schematic
- Attachment 2.2 Electrical Schematic
- Attachment 3 Designated Entity Agreement ("DEA")
- Attachment 4 Siting Study
- Attachment 5 Engineering Description and Safety Practices
- Attachment 5.1 Structures
- Attachment 6 List of Owners of Property within the Right-of-Way
- Attachment 7 Agency Requirements
- Attachment 8 List of Governmental Agencies, Municipalities, and Other Public Entities Receiving the Application
- Attachment 9 List of Governmental Agencies, Municipalities, and Other Public Entities Contacted
- Attachment 10 List of Public Locations where the Siting Application can be Viewed by the Public

- Attachment 11 Electric and Magnetic Fields Policy and Practices of Transource Pennsylvania and Transource Maryland
- Attachment 12 Vegetation Management
- Attachment 13 Agency Coordination
- Attachment 14 Public Notice Requirements
- Attachment 15 Notice of Filing

Q. Are you responsible for the oversight and preparation of any of the attachments or exhibits filed with the Siting Application?

A. Yes. I am responsible for overseeing the preparation of the entire Siting Application and supporting Attachments.

Q. Please describe the testimony submitted with the Siting Application.

A. Transource PA is submitting a total of six statements, including this one, in support of the Siting Application for the 9A West Project and the CPC Application. These Statements provide additional explanation of the matters addressed in the Siting Application and identify the witness who is sponsoring each portion of the Siting Application.

> Transource PA St. No. 1: Evan Dean, Managing Director Joint Ventures Governance and Operations for AEPSC – Provides an overview of the 9A West Project; provides a description of Transource PA and other related entities; describes the process employed by Transource PA in developing, preparing and filing this Siting Application; explains the decision making process within Transource PA for selecting the transmission line route; explains how Transource PA will oversee the construction, operations and maintenance of the 9A West Project; provides a status on the right-of-way acquisitions and support for the granting of the CPC Application.

> Transource PA St. No. 2: Eric Williams, Planning Engineer for AEP – Explains the need for the 9A West Project; describes the 9A West Project selected by PJM Interconnection, L.L.C. ("PJM"); and describes the obligation of Transource PA to complete the project

timely, and the reliability benefits of the 9A West Project for Pennsylvania.

Transource PA St. No. 3: Timothy J. Horger, Senior Director, Forward Market Operations for PJM – Explains the PJM Process; explains the need for the 9A West Project; and describes how the 9A West Project was selected by PJM to be built.

Transource PA St. No. 4: Barry A. Baker, AECOM Corporation, Vice President – Environmental Planning & Permitting – Eastern U.S. – Explains the environmental assessment, siting analysis, public outreach, evaluation of the Alternative Routes, and selection of the Proposed Route for the new double-circuit 230 kV transmission line associated with the 9A West Project.

Transource PA St. No. 5: Jacob Clouse – Transmission Line Engineer for Burns & McDonnell – Explains the design features of the 9A West Project; and describes the design and safety features and Electric and Magnetic Fields and Practices of Transource PA for the 9A West Project, including the new 230 kV transmission line.

Transource PA St. No. 6: Michael Mechler – Director of Right-of-Way and Infrastructure, Western Land Services Inc. – Explains the process used by Transource PA to attempt to acquire the rights-of-way and easements necessary for the 9A West Project; and provides a summary of the status of negotiations with landowners.

III. DESCRIPTION OF TRANSOURCE PA

Q. Please describe Transource PA.

A. Transource PA is a limited liability company organized and existing under the laws of Delaware. Transource PA is a wholly-owned direct subsidiary of Transource Energy, LLC ("Transource Energy"). Transource PA was formed to construct, own, operate, and maintain electric transmission facilities and equipment within the Commonwealth of Pennsylvania. Specifically, upon receipt of all necessary approvals, Transource PA will construct, own, operate, and maintain one new Pennsylvania substation and the Pennsylvania portion of the new Rice-Ringgold 230 kV interstate Transmission Line as

key components of the 9A West Project. As further explained below, Transource PA's affiliate, Transource Maryland, LLC ("Transource MD"), will construct, own, operate, and maintain the Maryland portion of the 9A West Project.

Q. Is Transource PA a Pennsylvania Public Utility?

A. Yes. Transource PA is an existing regulated transmission-only public utility in Pennsylvania having been issued a Certificate of Public Convenience ("CPC") by the PUC on December 19, 2024 in the matter *Authorizing approval to Transource Pennsylvania, LLC to begin to offer, render, furnish, or supply electric transmission service to the public in Peach Bottom Township, York County, Pennsylvania,* PUC Docket No. A-2024-3049272. However, a new CPC will be required in connection with the 9A West Project, and Transource PA is simultaneously filing with the Siting Application the CPC Application in connection with the proposed 9A West Project.

I should also note that the PUC provisionally granted Transource PA a CPC in an order entered on January 23, 2018 at Commission Docket Nos. A-2017-2587821 and G-2017-2587822 in connection with the 9A West Project, together with the separately docketed 9A East Project, then collectively called "Project 9A." Together, the Pennsylvania portions of Project 9A were known as the Independence Energy Connection ("IEC") Project. However, the provisionally-granted CPC was rescinded when the PUC denied Transource PA's separate applications for the siting of the proposed IEC Project in an order entered May 24, 2021, at PUC Docket Nos. A-2017-2640195 (the 9A East Project) and A-2017-2640200 (the 9A West Project or Project 9A West) (collectively, "IEC Proceeding").

Q. Please describe Transource PA's resources and experience in siting and constructing transmission facilities.

A. Transource PA and its affiliates have significant experience in successfully siting, constructing, owning, and operating transmission facilities. As explained above, Transource PA is the direct subsidiary of Transource Energy, which is indirectly owned by a partnership between two investor-owned utilities, American Electric Power Company, Inc. ("AEP") and Evergy, Inc., formed to develop and invest in competitive electric transmission projects across the United States.

AEP, through its subsidiaries, serves more than 5.6 million customers in eleven states, and owns and operates more than 40,000 circuit miles of electric transmission lines and approximately 252,000 miles of electric distribution lines, and has nearly 30,000 MW of generating capacity.

Evergy, headquartered in Kansas City, Missouri, was formed from the merger of Great Plains Energy Incorporated and Westar Energy, Inc. in 2018. Evergy's regulated utility units operate as Evergy Metro, Inc. (f/k/a Kansas City Power & Light Company ("KCP&L)), Evergy Missouri West, Inc. (f/k/a KCP&L Greater Missouri Operations, Inc.) and Evergy Kansas Central, Inc. (f/k/a Westar Energy, Inc.). The Evergy operating companies have served customers in Kansas and Missouri for more than 100 years. Evergy's vertically integrated, regulated electric utilities serve approximately 1.7 million customers in Kansas and Missouri with 10,200 circuit miles of transmission lines and about 61,200 circuit miles of distribution lines.

AEP and Evergy operate their transmission assets with the highest standards of reliability, safety, and North American Electric Reliability Corporation ("NERC")

compliance. Both AEP and Evergy operate multiple, fully-functional control centers and employ more than 1000 personnel in field operations to maintain, operate and restore transmission systems.

AEP and Evergy currently employ approximately 645 people in transmission project management and construction management functions. Combined, AEP and Evergy annually manage more than $5.95 billion in projects and have extensive experience in projects of a magnitude comparable to the 9A West Project. Further, AEP and Evergy have developed best-in-industry skills through over a 100+ year history of siting, designing, constructing, and operating transmission grids consisting of approximately 50,200 circuit miles of transmission lines.

In addition, as part of its current business practice, AEP has established partnerships with third-party engineering consultants who are trained in the appropriate application of AEP specifications and standards. Moreover, AEP has extensive experience in providing oversight to external consultants and third-party contractors, with industry-leading capabilities to effectively oversee all types of transmission siting, permitting, design and construction completed by outside firms.

Q. Will Transource PA be able to draw on the experience and resources of its affiliates for the siting, construction, ownership, operation, and maintenance of the 9A-West Project?

A. Yes. Transource PA will be able to draw on the significant resources and experience of AEP and Evergy, including their rigorous and proven project management practices.

IV. SUMMARY OF THE 9A WEST PROJECT

Q. Can you please provide an overview of the 9A West Project?

A. Yes. As explained in the written direct testimony of Company witness Timothy J. Horger (Transource PA Statement No. 3), PJM identified a need to alleviate transmission congestion constraints in Pennsylvania, Maryland, West Virginia, and Virginia. To address these congestion constraints, PJM approved what was originally called "Project 9A" (or the IEC Project) as Baseline Upgrade Numbers b2743 and b2752. Project 9A West was a major component of the PJM-approved Project 9A.

When the PUC denied Transource PA's separate applications for the siting of the former IEC/9A Project in an order entered May 24, 2021, at PUC Docket Nos. A-2017-2640195 (the 9A East Project) and A-2017-2640200, PJM suspended Project 9A, which included the 9A West Project. This process – including bringing the 9A West Project out of suspension - is described in greater detail by Mr. Horger in Transource PA St. No. 3.

The 9A West Project that has now been removed from suspension and directed by PJM to be constructed by Transource PA is more limited in scope and involves (i) construction of the new Rice Substation, and (ii) construction of the Rice-Ringgold 230 kV Transmission Line, both in Franklin County, Pennsylvania.

Upon receipt of all necessary approvals, the new Rice-Ringgold 230 kV Transmission Line will extend approximately 29 miles, connecting the existing Ringgold Substation located near Smithsburg, Washington County, Maryland, and the new Rice Substation to be located in Franklin County, Pennsylvania. This transmission line project is referred to as the 9A West Project and is the subject of this Siting Application.

As further explained by Eric S. Williams (Transource PA Statement No. 2), Transource PA is obligated and responsible for the construction, ownership, maintenance,

and operation of the new Rice-Ringgold Substation in Pennsylvania; and the Rice-Ringgold 230 kV Transmission Line in Pennsylvania. Transource MD is obligated and responsible for the construction, ownership, maintenance, and operation of the Maryland portion of the new interstate Rice-Ringgold 230 kV Transmission Line between Maryland and Pennsylvania.

The total estimated cost of the 9A West Project is approximately $231.3 million, which includes approximately $108.7 million for substation work and approximately $122.6 million for the new Rice-Ringgold 230 kV Transmission Line.

The scheduled in-service date for Project 9A West is January 19, 2029. Construction is scheduled to begin as soon as practical following PUC approval of the Siting Application and the CPC Application in a final order not subject to appeal or other legal challenge. The engineering and design of the 9A West Project are further explained in Attachment 4 to the Siting Application and in Jacob Clouse's written direct testimony (Transource PA Statement No. 5).

V. PROCESS TO DEVELOP THE 9A WEST PROJECT, SITING APPLICATION COMPONENTS AND RELATED FILINGS

Q. Please describe the major tasks Transource PA must undertake to construct the 9A West Project.

A. There are many tasks that must be organized and completed before service can begin. Chief among these are resource acquisition, contract management, cost and schedule management, transmission line siting, public outreach, design, right-of-way acquisition, material procurement, permitting, regulatory approvals, construction, and commissioning.

The 9A West Project Siting Study (Attachment 4 to the Siting Application) was performed in accordance with the process described below and is fully discussed in the

direct testimony of Mr. Barry A. Baker, Vice President – Environmental Planning & Permitting – Eastern U.S., of AECOM (Transource PA Statement No. 4). AECOM was hired due to its extensive expertise in siting large linear projects in Pennsylvania and elsewhere. AECOM provides comprehensive, life-cycle services for transmission and distribution projects, including alternative route analyses, licensing and permitting, conceptual engineering, right-of way services, public involvement, detailed engineering and design, geotechnical engineering and subsurface investigation, site preparation, construction management, and regulatory compliance. The siting process involves selecting a proposed route that (1) reasonably minimizes adverse impacts on area land uses and the natural and cultural environment; (2) minimizes special engineering design requirements and unreasonable costs; and (3) can be constructed and operated in a safe, timely, and reliable manner.

As further described in Attachment 4 to the Siting Application, consistent with our customary practices, Transource PA conducted extensive public outreach for the 9A West Project, which included a series of open houses, a project website, a virtual open house, direct mailings, newspaper notifications, and automated phone calls as part of the siting process for the transmission line.

The 9A West Project design was undertaken in increasing levels of complexity, which started with a magnitude design and ended with a detailed design that incorporates soil conditions and other field elements, such as topography and access roads. Design for the 9A West Project, at AEP's direction, continues to be led by Burns & McDonnell, a recognized industry leader in the design of electric transmission infrastructure, with support from AEP's internal engineering staff. Burns & McDonnell is an employee-owned

engineering, architecture and construction firm that designs, and builds electric transmission and distributions systems throughout North America.

There are a total of 102 landowners (85 in Pennsylvania) and 129 parcels (108 in Pennsylvania) along the route selected for the proposed 9A West Project. The process to secure the rights-of-way necessary for the 9A West Project is further described in the written direct testimony of Michael Mechler, Director of Right-of-Way and Infrastructure, Western Land Services Inc. (Transource PA Statement No. 6).

Q. Please summarize the principal permits and approvals required for the 9A West Project.

A. Attachment 7 to the Siting Application lists the local, state and federal agency requirements for permits, approvals or documentation. At the state level, cultural resource investigation approvals, waters/wetland encroachment permits, Submerged Lands License Agreements, state threatened and endangered species consultation and approvals will be required for the 9A West Project. Also, at the state level, Transource PA must receive PUC approval for the siting and construction of the transmission line. Transource MD is already in receipt of approval from the Maryland Public Service Commission concerning the Maryland portions of the 9A West Project. At the federal level, approvals may be required from the U.S. Army Corps of Engineers and the U.S. Fish and Wildlife Service. These requirements are discussed more fully in Attachments 4 and 7 to the Siting Application.

Q. Please summarize the 9A West Project schedule.

A. A project schedule is generally dictated by the terms of Schedule 6 of PJM's Amended and Restated Operating Agreement, and a Designated Entity Agreement ("DEA"). A DEA is a contract required to be entered into between PJM and the entity required to complete a

PJM-directed project. In connection with Project 9A West, Transource PA has executed a DEA with PJM for the 9A West Project as described by Eric S. Williams in Transource PA Statement No. 2. Transource PA expects the 9A West Project to be in service by January 19, 2029. Accordingly, Transource PA currently is planning for a 14-month construction schedule commencing with right-of-way clearing and line construction by July 26, 2027.

Q. Please summarize Transource PA's process for selecting the route for the 9A West Project.

A. As further described in Barry Baker's direct testimony (Transource PA Statement 4) and the Siting Study (Attachment 4 to the Siting Application), the Siting Team conducted a detailed siting analysis to determine a location for the 9A West Project that best balances construction, environmental, and engineering considerations. The purpose of the Siting Study was to gain an understanding of the opportunities and constraints in the Study Area to facilitate the development of feasible Alternative Routes, evaluate potential impacts associated with these Alternative Routes, and identify a Proposed Route to be constructed to meet the need for the 9A West Project.

Ultimately, through a quantitative and qualitative analysis and comparison of the feasible Alternate Routes, the Siting Team identified "Alternative Route C" as the Proposed Route for the 9A West Project. Alternative C continues to be the recommended Proposed Route. The Proposed Route was determined to be the route that best minimizes the overall impact of the 9A West Project on the natural and human/built environments.

Q. What was your role on the Siting Team for purposes of the 9A West Project?

A. My role is to provide general oversight of the Siting Team and provide directional guidance on siting related to the 9A West Project.

VI. CONSTRUCTION, OPERATION AND MAINTENANCE OF THE 9A WEST PROJECT

Q. Please explain how Transource PA will oversee the construction of the 9A West Project, if approved by the PUC.

A. Transource PA has assigned a Project Director that will oversee all aspects of construction for the 9A West Project for Transource PA. The Project Director is responsible for overseeing the planning and execution of the project work from the preliminary designs through to energization. The Project Director also serves as the single point of contact with the client, owner, and utility. The Project Director will develop a detailed work plan and schedule based upon the specific project requirements, including the environmental and construction permitting as well as any specific right-of-way requirements.

The Project Director will be responsible for all aspects of project execution including overall project management; engineering; permitting; right-of-way acquisition; material procurement; construction; checkout and commissioning; right-of-way restoration and project closeout; and handover to operations.

Transource PA will provide an experienced Construction Manager to oversee the construction effort and manage day-to-day activities in the field. The Construction Manager will be responsible for all construction and will report to the Project Director. The Construction Manager will be responsible for overseeing the on-site completion of work. The Construction Manager's primary role will be to ensure that day-to-day construction operations are executed safely and efficiently. The Construction Manager will assure that project resources, including material and manpower, are coordinated to meet the project objectives. The Construction Manager will oversee construction activities on both the substation and transmission line work utilizing qualified inspectors and

coordinators. These inspectors and coordinators will oversee vegetation clearing, site preparation and development, building of access roads, transmission tower and substation foundations, substation steel and equipment erection, transmission tower, hardware installation and line pulling, and commissioning activities on site.

Safety is the most important responsibility of the Construction Project Management Team. Transource PA firmly believes that no project objectives or milestones can ever come before the safety of the workforce and general public. The Project Director, Construction Manager, and Inspection Team will ensure that performance of the construction activities adhere to the rigorous and proven project management and safety practices of Transource Energy and its affiliates, which represent a proven approach to safe work practices.

In addition to safety, the Construction Project Management Team is responsible for quality assurance and resource management to ensure the 9A West Project is executed successfully on-time and on-budget. Transource PA will follow its established and proven-successful practices in performance of the work.

Q. Please explain how Transource PA will maintain the 9A West Project, if approved by the PUC.

A. Transource PA will own, operate, and provide the maintenance for the Rice Substation as well as the portions of the 230 kV Rice-Ringgold 230 kV Transmission Line located in Pennsylvania. Transource PA will use a combination of highly-qualified internal and external resources to accomplish these tasks in a safe, timely, and efficient manner.

Transource PA has access to a network of 5 Transmission Dispatch and System Control Centers that employ over 250 dedicated employees and is available 24 hours a day, 365

days a year. Transource PA will continuously monitor the operating functionality of the substation equipment remotely from one of these System Control Centers. In addition to our remote monitoring, Transource PA will perform thorough periodic physical maintenance checks with qualified personnel.

In Pennsylvania, Transource PA will establish a service agreement with a locally based, qualified, dedicated services contractor to provide systematic routine maintenance checks as well as immediate operation and maintenance services as needed.

In the event of a storm, outage, or an emergency situation involving the new substation or transmission lines, Transource PA will be able to respond immediately to provide restoration support. Transource PA will provide a dedicated/assigned phone number that will be monitored 24 hours a day, 365 days a year to use in case of a storm event or responding to an outage. Transource PA will immediately call our dedicated services contractor to coordinate the issuance of resources to support the response effort. When responding to an event, the dedicated services contractor will call on its local crews, for a timely response.

Transource PA recognizes that a crucial element in meeting customers' electric service requirements is its ability to react promptly to a storm or other emergency situation and the capacity to restore service as quickly and economically as possible. The dedicated service provider will be structured to respond to any request for assistance 24 hours a day, 365 days a year.

VII. STATUS OF RIGHTS-OF-WAY

Q. Please describe the right-of-way requirements for the 9A West Project.

A. Right-of-way requirements are discussed more fully in the direct testimony of Michael Mechler (Transource PA Statement No. 6). Transource PA's standard right-of-way width for a double circuit 230 kV transmission line is approximately 130 feet, 65 feet either side of the proposed centerline of the transmission line. A cross section of the proposed rights-of-way required for the 9A West Project is provided in Attachment 4 to the Siting Application. The aerial maps of the route selected for the 9A West Project are provided in Attachment 4, which shows the location of the Proposed Route and identifies the properties that are traversed by the proposed route. Additionally, a list of all persons owning property within the proposed rights-of-way is included in Attachment 6 to the Siting Application.

Q. Is Transource PA acquiring rights-of-way and easements for the 9A Project?

A. Yes. As explained in the direct testimony of Michael Mechler (Transource PA Statement No. 6), Transource PA is continuing to negotiate with all affected landowners along the Proposed Route to reach a reasonable and mutually acceptable right-of-way agreement. However, at the time Transource PA prepared this filing, it had not yet been able to acquire all of the rights-of-way and easements necessary for the 9A West Project.

Q. Please explain why Transource PA has not been able to acquire all the rights-of-way and easements necessary for the 9A West Project.

A. As noted earlier, the 9A West Project has been under suspension by PJM since 2021 and has only recently been released from suspension. Given the uncertain status of the 9A West Project during suspension, Transource PA ceased discussions with impacted landowners. Now that the 9A West Project has been released from suspension, Transource PA is actively

assessing the status of necessary rights-of-way and is committed to obtaining those rights by mutual agreement sufficiently in advance of the 9A West Project's in-service date of January 19, 2029.

Q. Is Transource PA seeking to condemn rights-of-way and easements necessary for the 9A West Project?

A. Not at this time. Transource PA will continue to negotiate with the remaining affected landowners along the Proposed Route with whom we do not presently have an agreement to reach a reasonable and mutually acceptable right-of-way agreement and, thereby, avoid the need to condemn rights-of-way across the properties traversed by the 9A West Project. In the event Transource PA is unable to acquire the rights-of-way needed for the 9A West Project, Transource PA will promptly file separate applications seeking PUC approval to exercise the power of eminent domain to acquire rights-of-way and easements for the proposed 9A West Project. If any such condemnation applications become necessary, Transource PA will request that they be consolidated and considered with this Siting Application for the 9A West Project.

VIII. CPC APPLICATION

Q. **Is Transource PA requesting issuance of a CPC to provide transmission-only service in Franklin County, Pennsylvania?**

A. Yes. Transource PA is already certificated to provide transmission service as a public utility in Peach Bottom Township, York County, Pennsylvania. The Commission's historic practice has been to grant CPC's to transmission-only public utilities for each geographic area where they intend to construct and operate facilities to serve the public. I incorporate by reference into this testimony the Transource PA CPC Application and its related

Appendices, as well as the material submitted in this Siting Application, in support of approval of the CPC Application.

Q. Is Transource PA technically, financially and legally fit to provide electric transmission service in Franklin County, Pennsylvania?

A. Yes. As mentioned above, Transource PA is already certificated and fully authorized to conduct business as a transmission service public utility in Peach Botton Township, York County, Pennsylvania. In order to obtain that CPC, Transource PA previously demonstrated to the Commission that it possesses the legal, technical and financial fitness necessary to be a certificated public utility in Pennsylvania.

Relative to legal fitness in connection with the current CPC Application, Transource PA and its affiliates are in compliance in all material respects with federal and state laws in the jurisdictions in which it operates. Upon receipt of a CPC authorizing service in Franklin County, it will continue to be legally fit to own and operate electric transmission facilities in the Commonwealth of Pennsylvania.

The Company is also technically fit. As described in the Appendices to the CPC Application, Transource PA, its parent Transource Energy and related affiliates, have abundant managerial and technical experience to own and operate the 9A West Project and its related equipment and facilities to render electric service in Franklin County. AEP has extensive experience in transmission projects comparable to the 9A West Project. Transource Energy operates its transmission assets with the highest standards of reliability, safety and North American Electric Reliability Corporation ("NERC") compliance.

Transource Energy and Transource PA also have the financial fitness necessary to construct, own, maintain and operate Project 9A West. Specifically, Appendix 3 of the

CPC Application, Transource PA's FERC Form 1, demonstrates that the Company has the necessary financial fitness and resources to construct and operate Project 9A West. Borrowing capacity can be sized as needed and is more than sufficient to accommodate the anticipated debt financing for construction of the 9A West Project. Confidential Appendix 4 to the CPC Application demonstrates sufficient borrowing capacity and Appendix 5 of the CPC Application shows Transource Energy's current Moody's credit rating is A2. The strong balance sheets of Transource PA's ultimate parents (AEP and Evergy) and their credit ratings history shown in Appendix 6, Appendix 7 and Confidential Appendix 8 of the CPC Application also confirm Transource PA's financial fitness.

Q. Is Project 9A West needed?

A. Yes. Based on PJM's finding that Project 9A West is necessary to relieve congestion and improve market efficiency and that Transource PA is obligated to construct Project 9A West under the executed DEA, the project is necessary for service, accommodation and convenience of the public. In determining the need for Project 9A West, PJM's process considered the costs and benefits of the project.

Q. Does Project 9A West provide any additional value?

A. Yes. As noted and described further in the Direst Testimony of Eric S. Williams, Transource PA Statement No. 2, Project 9A West will bolster electric reliability in the area, particularly until further electric transmission lines are constructed and placed in service. In addition, based on our preliminary evaluation, Franklin County will experience economic benefits during the construction phase of the 9A West Projects based on the anticipated amount to be spent by Transource PA in Franklin County. These economic benefits are in the tens of

millions of dollars and include the creation of hundreds of direct and indirect jobs, labor income, overall local economy impacts and benefits, and additional state and local taxes.

Q. Does this conclude your direct testimony?

A. Yes, it does. However, I reserve the right to file such additional testimony as may be necessary or appropriate during the course of this proceeding.

VERIFICATION

I, Evan K. Dean, Managing Director, Transmission Joint Ventures Governance and Operations, hereby state that the facts set forth above 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).

Date: May 21, 2026

By: _____

Evan K. Dean, Managing Director
Transmission Joint Ventures Governance
and Operations

STATEMENT 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 County, Pennsylvania	:	Docket No. A-2026-_____

Transource Pennsylvania, LLC
9A West Project

Statement No. 2

Direct Testimony of
Eric S. Williams

Topics Addressed: **Brief Description of the 9A West Project Support for PJM Planning Obligation of Transource PA to Complete the 9A West Project Reliability Benefits of the 9A West Project for Pennsylvania Designated Entity Agreement**

Dated May 21, 2026

I. INTRODUCTION

Q. Please state your full name and business address.

A. My name is Eric S. Williams. My business address is 8500 Smiths Mill Road, 2nd Floor, New Albany, OH 43054.

Q. What is your position at American Electric Power?

A. I am employed by American Electric Power Service Corporation ("AEPSC") as a Regional Transmission Planning Engineer. In this capacity, I provide services to Transource Energy, LLC, the parent of Transource Pennsylvania, LLC ("Transource PA" or the "Company").

Q. What are your current responsibilities?

A. I am responsible for the design and development of regional, interregional, and competitive transmission planning activities in various Regional Transmission Organizations ("RTO"), including PJM Interconnection, L.L.C. ("PJM"), Midcontinent Independent System Operator ("MISO"), and the Southwest Power Pool ("SPP") regions.

Q. Please provide your educational background.

A. I earned a B.S. – Electrical Engineering (2005) and M.S - Electrical Power Systems (2008) from the Colorado School of Mines located in Golden, Colorado.

Q. Please describe your professional experience.

A. I have been employed by AEPSC for 5 years as a regional transmission planning engineer. Prior to my employment with AEPSC, I was employed in various electrical utility focused roles with previous companies including economic resource planning (Tri-State Generation and Transmission Assoc.), North American Electric Reliability Corporation ("NERC") reliability coordination operations (Western Electricity Coordinating Council

and Peak Reliability Coordination), and distribution construction design (Consumers Energy).

Q. What is the subject matter of your Direct Testimony?

A. My Direct Testimony supports the Siting Application filed by Transource PA with the Commission for the 9A West Project by: (i) briefly describing the "9A West Project", (ii) describing how Transource PA supports PJM's regional transmission planning process, (iii) addressing Transource PA's obligation to complete the Pennsylvania portion of the 9A West Project, and (iv) identifying the reliability benefits of the 9A West Project for Pennsylvania, beyond the need for the 9A West Project described by Transource PA witness Timothy Horger in Transource PA Statement No. 3.

Q. Have you testified previously in any proceedings before the Pennsylvania Public Utility Commission ("PaPUC" or "Commission") or any other administrative agencies?

A. No.

Q. Are you responsible for the preparation of any of the Attachments or exhibits filed with the Siting Application?

A. Yes. I am responsible for Attachment 2 of the Siting Application, the Necessity Statement and Attachment 2.1 that includes a map of the 9A West Project and a single line electrical schematic. I also sponsor Attachment 3, which contains the Designated Entity Agreement ("DEA") with PJM for the 9A West Project.

II. DESCRIPTION OF THE PROPOSED 9A WEST PROJECT

Q. Please describe the 9A West Project approved by PJM.

A. The 9A West Project involves (i) construction of the Rice Substation in Pennsylvania; and (ii) construction of the new overhead double-circuit Rice-Ringgold 230 kV Transmission Line.

Upon receipt of all necessary approvals, the new Rice-Ringgold 230 kV Transmission Line will be sited to extend approximately 29 miles, connecting the existing Ringgold Substation located near Smithsburg, Washington County, Maryland, and the new Rice Substation to be located in Franklin County, Pennsylvania. This transmission line project is the subject of this Siting Application.

Q. Please describe the elements of the 9A West Project for which Transource PA is responsible.

A. With respect to the 9AWest Project, Transource PA will construct, own, operate, and maintain the new Rice Substation. The new Rice Substation will be a 500-230 kV substation located in Franklin County, Pennsylvania that will be tied into the existing Hunterstown-Conemaugh 500 kV Transmission Line. The Rice Substation will also be interconnected with and provide the 230 kV supply to the proposed new Rice-Ringgold 230 kV Transmission Line.

Transource PA will also construct, own, operate, and maintain the Pennsylvania portion of the new Rice-Ringgold 230 kV Transmission Line. Transource PA's affiliate, Transource Maryland, LLC ("Transource MD"), will construct, own, operate, and maintain the Maryland portion of the Rice-Ringgold 230 kV Transmission Line.

Q. Is the 9AWest Project expected to resolve certain transmission congestion issues identified by PJM?

A. Yes. The 9A West Project is intended to directly address transmission congestion on the AP South Reactive Interface.[1] How and why the 9A West Project will relieve this identified congestion is described in greater detail by Transource PA witness Timothy Horger in Transource PA Statement No. 3.

III. TRANSOURCE PA SUPPORT FOR PJM'S PLANNING PROCESS

Q. Can you briefly describe PJM's planning process and the Company's role and responsibilities in that process?

A. Yes. PJM, as the regional transmission organization, conducts a coordinated Regional Transmission Expansion Planning ("RTEP")[2] process and administers the Generator Interconnection Process ("GIP")[3] to identify reliability violations and market efficiency needs, evaluate candidate solutions, and allocate costs through an open stakeholder process. The Company supports PJM by providing timely and accurate models, topology, ratings, load forecasts and study data; participating in PJM studies and stakeholder reviews; identifying and proposing owner-sponsored solutions for local needs; and, when assigned responsibility to construct a project, by designing, permitting, constructing, testing and placing approved transmission upgrades into service in accordance with PJM timelines, tariff rules and cost-recovery mechanisms.

[1] The AP South Reactive Interface is a 500 KV transmission interface in the PJM interconnection consisting of four 500 KV lines designed to manage voltage stability and electricity flows from western, lower-cost generation to eastern load centers such as Maryland, Virginia and the District of Columbia. It is considered a persistent transmission bottleneck that causes consistent congestion.

[2] PJM's RTEP process is a comprehensive 15-year planning cycle designed to ensure grid reliability, meet demand, and improve market efficiency across the PJM footprint. https://insidelines.pjm.com/pjm-publishes-updated-brochure-explaining-pjms-rtep-process/

[3] The GIP is explained in PJM Manual 14G.

Q. **How does the Company help PJM meet its obligation to ensure reliable transmission service?**

A. In addition to providing timely, accurate information and constructing and placing into service RTEP facilities as discussed above, the Company supplies real-time SCADA[4]/EMS[5] telemetry, coordinates outages and switching; maintains protection, control and voltage/reactive resources; executes preventive maintenance and vegetation management; and delivers emergency response, blackstart[6] and mutual aid while meeting PJM/NERC/Federal Energy Regulatory Commission ("FERC") reporting, cost-allocation and stakeholder engagement requirements.

Q. How does the Company help PJM meet its obligation to ensure efficient transmission service?

A. The Company supports PJM's efficiency goals by supplying accurate models, forecasts and constraint data that enable market-efficient studies and resource dispatch; identifying and proposing cost-effective, owner-sponsored transmission alternatives that minimize total system costs; providing constructability, cost and schedule input to ensure selected solutions are least-cost and timely; operating and maintaining assets (including dynamic ratings, volt/VAR controls, and reactive devices) to reduce congestion and losses; coordinating outage scheduling and switching to preserve market operations and limit redispatch costs; integrating and enabling non-wires solutions, storage and Distributed

[4]Supervisory Control and Data Acquisition ("SCADA") is a control system architecture comprising computers networked data communications and graphical user interfaces for high-level supervision of machines and processes.

[5] Endpoint Management Software ("EMS") provides a centralized console to monitor, secure, and manage diverse devices—laptops, desktops, and smartphones—across an organization's network.

[6] Blackstart capability is the ability of a power plant, generator, or battery system to start up and restore operations independently, without relying on an external, functional power grid.

Energy Resources ("DERs")[7] where they provide lower-cost outcomes; and participating in stakeholder and tariff processes to support transparent cost allocation and efficient market signals.

IV. ADDITIONAL BENEFITS OF THE 9A WEST PROJECT

Q. Are you addressing any Pennsylvania benefits from the 9A West Project?

A. Yes.

Q. Will the 9A West Project provide any additional benefits to, for or within Pennsylvania?

A. Yes. Although the primary benefits from the 9A West Project relate to regional market efficiency and the reduction of congestion costs, as discussed by Timothy Horger in Transource PA Statement No. 3, the new transmission facilities associated with the 9A West Project will also enhance the electrical strength and reliability of the transmission system by virtue of the new transmission facilities in the area that will be part of the interconnected transmission grid. The 9A West Project will provide additional and alternative paths for electricity in the event of outages on other Pennsylvania transmission facilities. The 9A West Project also will enable the interconnection of potential future reliability and generation projects in the area.

[7] DERs are small-scale, localized electricity generation or storage technologies—such as solar panels, batteries, and wind turbines—situated near the point of use, typically behind the utility meter.

Q. How did Transource PA determine whether there are reliability benefits for Pennsylvania from the 9A West Project?

A. The Pennsylvania reliability benefits were evaluated and determined using PJM's published Power System Simulation for Engineers ("PSSE") powerflow models to examine the local electricity load flow in the 9A West Project footprint and nearby electrical systems. PSSE is a software power analytics computer program published by Siemens. It is an industry accepted transmission planning and analysis software that allows transmission planners to optimize power supply, mitigate risk and provide valuable information before making major investment decisions. PSSE supports large-scale grid modeling with power flow analysis for up to 200,000 buses, contingency and fault analysis, substation node-breaker modeling and integrated plotting and visualization tools.

Q. Please describe your experience in operating PSSE and interpreting the results of its analytical process.

A. In my current role, I routinely use PSSE to visualize and simulate the steady state power flow of the transmission system, and to measure the impacts of changes on the bulk power system.

Q. What is the nature and form of the inputs into and outputs from PSSE?

A. The primary inputs into PSSE are load, generation, and transmission network parameters. PSSE performs a mathematical analysis and generates a steady state power flow solution that simulates and calculates power flows across transmission elements and substation bus voltages. PJM coordinates the construction of these models with the entities across its footprint to assemble these models for transmission planning and needs forecasting.

Q. How is the output from PSSE used to evaluate and determine the benefits of any particular transmission line or facility?

A. The simulated transmission flow output from PSSE can be analyzed to determine if any element in the network is overworked or operating outside normal reliable system parameters; examples include too much power flowing on a line or the voltage at a node in the system being too high or low. These issues can arise from various stresses placed on the transmission system, such as the introduction of new loads, facility parameter changes, or contingency analysis.

A new transmission project may be required to ameliorate or strengthen the transmission network if the system is operating beyond reliable parameters.

Q. Please describe how you deployed PSSE in connection with the 9A West Project and the results of your work.

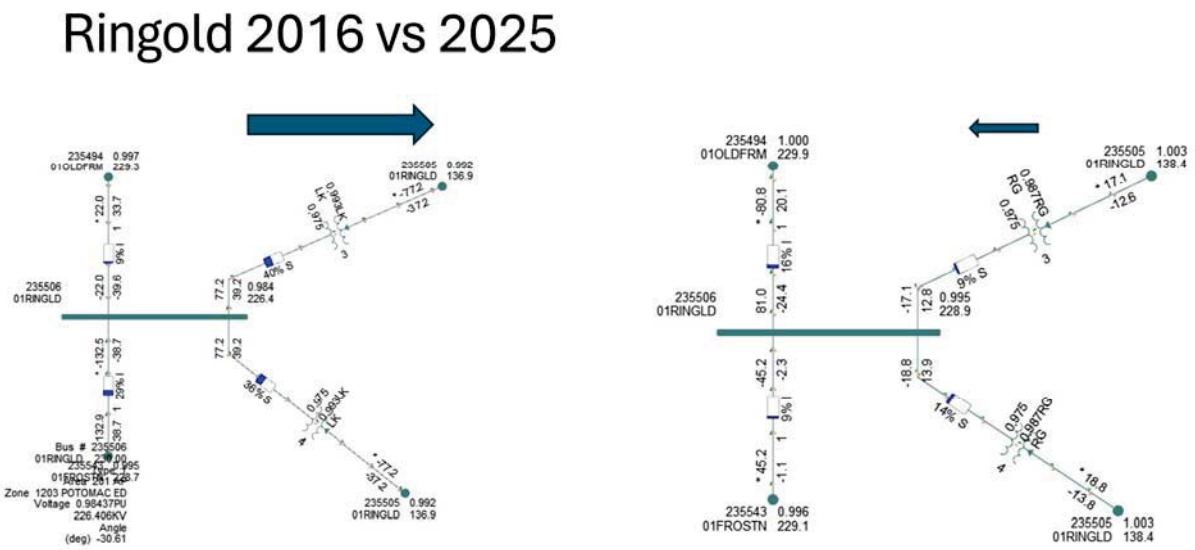
A. My analysis involved reviewing and evaluating PJM's RTEP 2025 series power flow models that forecasted summer peak power flows in the year 2030. I specifically measured how the local electric load flows have changed over time since the original 9A Project proposal, and how the power flows would change again with the construction and operation of the Transource 9A West Project.

My analysis demonstrates the following Pennsylvania reliability benefits:

i) When the 9A West Project was initially approved, the Ringgold Substation located in Smithburg MD, was an electrical source to the PA south and MD north local areas via the 230kV connection to Doubs Substation approximately 26 miles south, and power flowed across the Ringgold Substation transformers from high voltage to low voltage. The most recent PSSE models published by PJM show this power flow

reversing, with power flowing from low voltage to high across the Ringgold Substation transformers. This is called backfeeding and is an indication that the local electric system reliability may be at risk, or that unintended flows are occurring across the system due to the physical laws of electrical flow. Chart ESW-1 below shows the changes in power flows at the Ringgold Substation transformers in 2016 and 2026:

ESW Chart-1



In this instance, power that was intended to use higher voltage transmission paths is using lower voltage lines. The addition of the 9A West Project will restore the Ringgold Substation transformers to their original design of serving local area load instead of becoming a parallel path for high voltage transmission.

Chart ESW-2

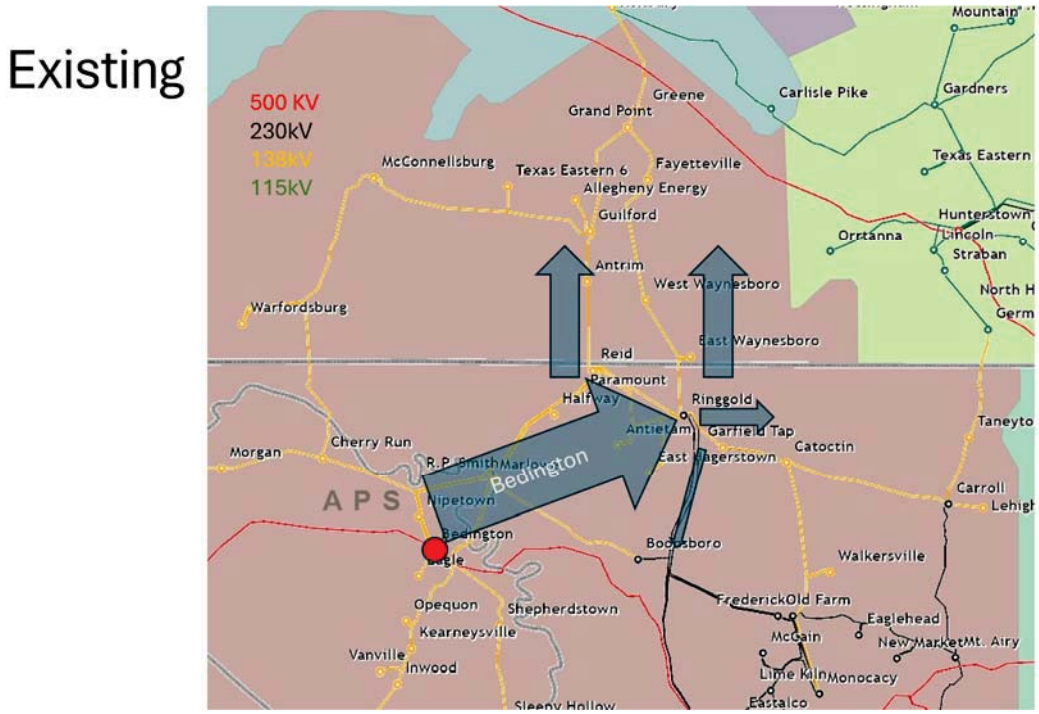
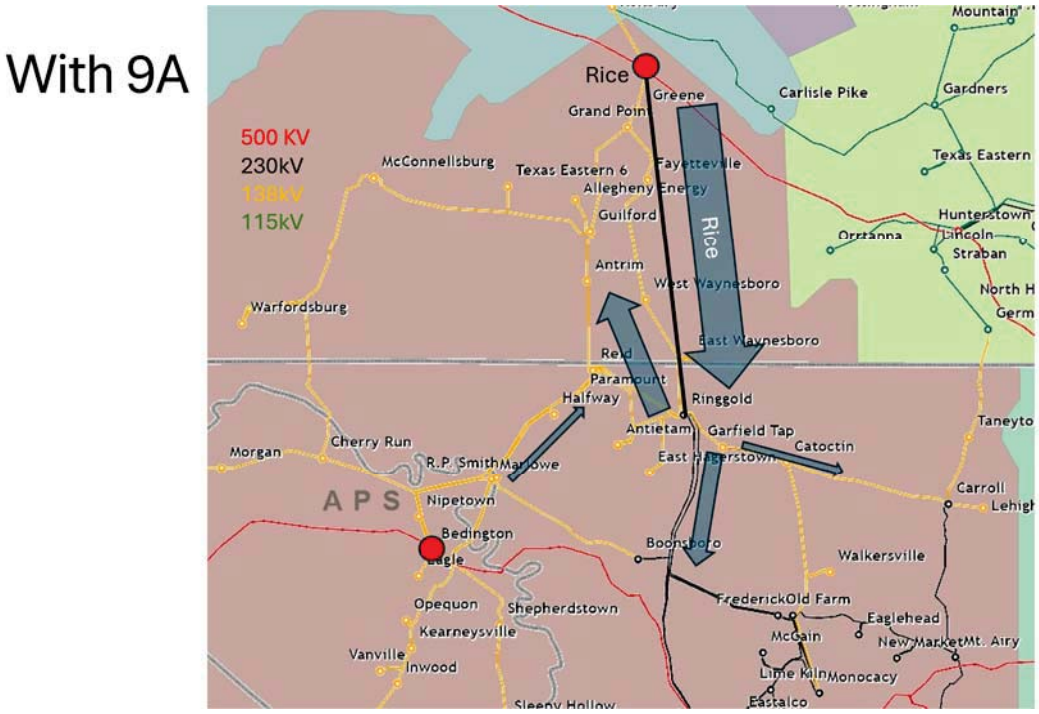


Chart ESW-3



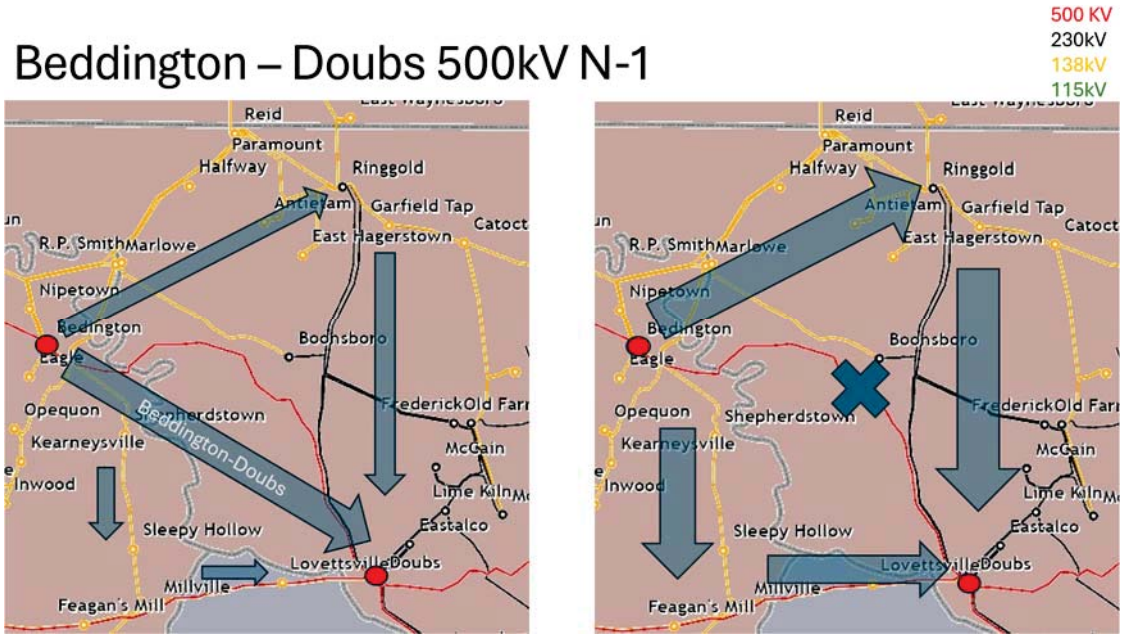
ii) If the Ringgold Substation transformers are backfeeding, that substation that was once an electrical "source" for the region is now a "sink". An electric source is a device, entity, or geographical location that *injects power* into the electrical network. In contrast, an electric sink is a device, entity, or geographical location that *absorbs or consumes* power from the electrical network. This change in the operating function of the Ringgold Substation transformers reduces the quantity of electrical sources in the PA south /MD north region and increases the likelihood and severity of an N-1 or N-1-1 event that would result in an unplanned interruption of customers' electric service known as "loadshed".[8]

iii) The new primary electrical source for the PA south /MD north region has now become the Bedington Substation located near Bedington West Virginia, as shown in Chart ESW-2 and Chart ESW-4 below.

For certain contingencies associated with the 500kV transmission system, the resulting power must flow between the Bedington and Ringgold Substations across the lower voltage lines. This introduces the risk of overload on these lower voltage lines; and can constrain the capability of power to safely flow across the 500kV electrical system as well as increasing the potential for cascading N-1 contingencies that may result in loadshed near the Ringgold substation. This phenomenon is illustrated by the diagram below.

[8] An N-1 power system contingency is a grid reliability standard requiring that the system continue operating normally without load loss or voltage issues, even if any single critical component—such as a line, transformer, or generator—fails. An N-1 contingency represents the failure or loss of any given power system element in normal electric system conditions. N-1-1 represents the loss of two sequential elements in extreme conditions like extreme weather or emergency electric system conditions.

Chart ESW-4



The above diagram shows how power flows over lower voltage 138kV lines when the power system experiences a contingency with the higher 500kV transmission system. The introduction of the 9A West Project will reduce the severity of power flowing on the 138kV network between Bedington and Ringgold by creating a higher voltage 230kV path for power to flow in the event of this specific contingency.

Reliability solutions that address 500kV N-1 violations along the 500kV corridor are moving forward, but the in-service date for those projects will not occur within the studied 5-year time horizon. In the meantime, the 9A West Project will provide reliability support in the Ringgold area until the larger solutions can be placed in service, and will work in tandem to provide reliability support to the Ringgold area with these larger solutions in the future.

Q. How does Transource PA's analysis of Pennsylvania benefits from the 9A West Project relate to the need determination made by PJM that is discussed in Transource PA Statement No. 3 from Timothy Horger?

A. Mr. Horger's testimony focuses on the beneficial economic impacts of the 9A West Project at a macro-level, the bulk electric system, while I analyzed the local electrical reliability benefits in Pennsylvania that would result from the construction of the 9A West Project.

V. TRANSOURCE PA'S OBLIGATION TO COMPLETE THE 9A WEST PROJECT

Q. Who will construct, own, and operate the 9A West Project?

A. As explained above, Transource PA will construct, own, operate, and maintain the Pennsylvania portion of the 9A West Project, and Transource MD will construct, own, operate, and maintain the Maryland portion of the 9A West Project.

Q. Are Transource PA and Transource MD required to build the 9A West Project?

A. Yes. Transmission projects that originate through PJM's RTEP utilize a DEA to assign construction responsibility for the identified project to the "Designated Entity." The DEA is a two-party agreement between the Designated Entity and PJM. The terms and conditions of the agreement govern the construction period of the transmission project and define specific rights and obligations of the parties. On April 2, 2026, PJM and Transource Energy[9], on behalf of Transource PA and Transource MD, completed and executed a DEA for the 9A West Project. The DEA for the 9A West Project is included as part of Attachment 3 of the Application.

[9] Transource Energy is the parent company of Transource PA and Transource MD.

Q. Please summarize the primary terms and conditions of the DEA for the 9A West Project.

A. The DEA between PJM and Transource, among other things, obligates Transource to "design, engineer, procure, install, construct, own, operate and maintain" the 9A West project within the agreed upon cost constraints and timelines defined by the two parties. The DEA has appendices that contain relevant project details, such as the scope of work, the development schedule and cost commitments.

Q. Is the DEA for the 9A West Project expected to be filed with the FERC?

A. Yes. The fully executed DEA for the 9A West Project was filed with FERC on May 1, 2026. Assuming there are no objections to the DEA, we expect the agreement to be accepted 60 days after filing. We will continue to apprise the PaPUC and all parties to this proceeding on the status of FERC's consideration of the DEA and will supplement the record with any new information pertinent to that agreement.

Q. Does this conclude your direct testimony?

A. Yes, it does. However, I reserve the right to submit such additional testimony as may be necessary or appropriate during the course of this proceeding.

VERIFICATION

I, Eric S. Williams, Regional Transmission Planning Engineer, American Electric Power Corporation, hereby state that the facts set forth above 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).

Date: May 21, 2026

By: Eric S Williams

Eric S. Williams
Regional Transmission Planning Engineer
American Electric Power Corporation

STATEMENT 3

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 County, Pennsylvania	: : : : : :	Docket No. A-2026-_____

Transource Pennsylvania, LLC
9A West Project

Statement No. 3

Direct Testimony of
Timothy J. Horger

Topics Addressed: **The PJM Process**
The Selection of the 9A West Project
The Continued and Current Need for the 9A West Project

Dated: May 21, 2026

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Timothy J. Horger, and my business address is 2750 Monroe Boulevard, Audubon, Pennsylvania 19403-2497.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am employed by PJM Interconnection, L.L.C. ("PJM"), a Regional Transmission Organization ("RTO"), as Senior Director, PJM Forward Market Operations.

Q. PLEASE DESCRIBE YOUR PROFESSIONAL EXPERIENCE AND EDUCATIONAL BACKGROUND.

A. In my current role as Senior Director, PJM Forward Market Operations, I oversee PJM's Financial Transmission Rights ("FTR"), Capacity, and Demand Side Markets, including the design, development, and execution of those markets, the facilitation of PJM stakeholder initiatives related to those markets, and the professional development of PJM staff who work in the departments administering those markets. I am also responsible for overseeing all activities associated with the Market Efficiency Economic Planning process at PJM. In addition, I am responsible for efforts associated with Strategic Market initiatives.

I have been employed by PJM for over twenty-three years. Prior to being Senior Director, PJM Forward Market Operations, I was the Director of Energy Market Operations. In that position, I was responsible for overseeing the execution of the PJM Market systems, including the Day-ahead, Real-time, FTR, Market Efficiency, and Interregional Market Operations areas. In addition, I was responsible for the design and

development of the PJM market systems, facilitation of stakeholder initiatives, strategic market initiatives, and development of staff. Before that, I was the manager of the PJM Interregional Market Operations department, manager of the PJM Market Simulation department, and the Senior Lead Engineer of the Auction Revenue Rights ("ARR") and FTR group. In the role of Interregional Market Operations Manager, my responsibilities included overseeing all market activities associated with interregional market coordination with neighboring areas including Market-to-Market daily congestion management, Congestion Management Process, Joint and Common Market, Interchange Distribution Calculator Working Group, North America Energy Standards Board, and project support.

In my role as Market Simulation Manager, I was also responsible for overseeing all activities associated with the ARR/FTR Markets and the Market Efficiency Economic Planning process at PJM. This included responsibility for execution and design of the Market Efficiency Analysis, Annual FTR Auctions, ARR Allocations, Long Term and Monthly FTR Auctions, and Incremental ARR analysis. I was responsible for the market efficiency analysis associated with the Transource Pennsylvania LLC's ("Transource PA") Project 9A West.

In my role as Senior Lead Engineer for the ARR/FTR group, I was responsible for leading and conducting all activities related to ARR and FTR functions including Incremental ARR analysis, FTR Auction setup and clearing, software design, and stakeholder support. I was also responsible for daily locational marginal price verification, Day-ahead market clearing, power flow analysis, and market congestion studies.

Prior to joining PJM in 2002, I was a Power Systems and Control Engineer at Laser Technology, Inc. where I designed Power and Control Systems for Electric Industry

equipment. I also developed power distribution schematics, designed Programmable Logic Controllers, programmed Multiple Axis Motion Control Systems, and designed CE/UL certified equipment.

In addition, I was previously employed at Lockheed Martin Government Electronic Systems as an Electrical Integration Engineer where I led and performed electrical integration design for the U.S. Naval AEGIS Combat System.

Q. WHAT ACADEMIC DEGREES DO YOU HOLD?

A. I hold a Bachelor of Science degree in Electrical Engineering from Drexel University, conferred in 1997, and a Master of Science degree in Systems Engineering from Pennsylvania State University, conferred in 2002.

Q. PLEASE DESCRIBE THE PURPOSE OF YOUR TESTIMONY.

A. I have been asked by Transource Pennsylvania, LLC ("Transource PA")[1] to describe PJM and its Regional Transmission Expansion Plan ("RTEP") process. I have also been asked to explain why PJM determined that Transource PA's market efficiency project,[2] which I will refer to as Market Efficiency Project 9A West ("Project 9A West") in the context of the RTEP and why Project 9A West, as analyzed in 2025, is needed to alleviate transmission congestion in PJM.

[1] Transource PA and its Maryland affiliate, Transource Maryland, LLC ("Transource MD"), are responsible for the construction, ownership, maintenance, and operation of certain components of Project 9A West, as described in more detail in this testimony.

[2] For purposes of this testimony, a "market efficiency project" is a transmission enhancement or expansion that is developed pursuant to section 1.5.7 of Schedule 6 of the Amended and Restated Operating Agreement of PJM Interconnection, L.L.C. ("Operating Agreement"), and that is needed to relieve transmission constraints that have an economic impact ("economic constraints").

Q. HAVE YOU TESTIFIED PREVIOUSLY BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION ("PaPUC") OR BEFORE ANY OTHER ADMINISTRATIVE AGENCIES?

A. Yes. In 2020, I provided testimony in PaPUC Docket Nos. A-2017-2640195; A-2017-2640200; P-2018-3001878; P-2018-3001883; and A-2018-3001881, which concerned the original Project 9A. I have also offered testimony in regulatory proceedings before the Maryland Public Service Commission concerning the original Project 9A. And, I have provided testimony to the Federal Energy Regulatory Commission.

Q. PLEASE BRIEFLY SUMMARIZE YOUR TESTIMONY AND CONCLUSIONS.

A. In this testimony, I will describe PJM's role and responsibility as a Federal Energy Regulatory Commission ("FERC")-approved RTO to identify and address needed transmission system enhancements in its Region. I will explain how PJM, in performing that role, uses a FERC-approved RTEP process to evaluate and select necessary projects. I explain how PJM evaluated and selected the original Project 9A as a needed project to address market efficiency concerns caused by persistent transmission congestion. I explain how PJM's RTEP process identified a need for part of Project 9A called Project 9A West—the subject of these proceedings—to alleviate transmission constraints causing congestion in PJM's Region.

Q. PLEASE PROVIDE AN OVERVIEW OF THE ORIGINAL PROJECT 9A AND PROJECT 9A WEST.

A. PJM initially selected Project 9A (the "Original Project 9A") to address significant transmission constraints with economic impacts identified in PJM's 2014/15 Long Term

Proposal Window. The Original Project 9A was composed of two components that were collectively referred to as the Independence Energy Connection Project ("IEC Project"). The IEC Project/Project 9A involved: (i) construction of two new substations in Pennsylvania—the Rice Substation and the Furnace Run Substation; and (ii) construction of two new overhead double-circuit 230 kV interstate transmission lines—the Rice-Ringgold 230 kV transmission line and the Furnace Run-Conastone 230 kV transmission line.

As I will discuss below, however, after the PJM Board of Managers ("PJM Board") approved the Original Project 9A for inclusion in the RTEP, and while that project was placed in suspension during the pendency of related siting proceedings, the PJM transmission system continued to evolve. In December 2023, the PJM Board approved some new transmission facilities that occupy the same physical location, or rights-of-way, as the eastern portion of the Original 9A Project or that otherwise would perform a similar function to the eastern portion of the project. Specifically, (i) the Transource PA Furnace Run-Conastone 230 kV transmission line was proposed to be located on the same rights-of-way as those that will be used by the Chanceford-Conastone 500 kV transmission line (approved as part of 2022 Window 3), and (ii) the Chanceford 500kV substation (also approved as part of 2022 Window 3) will be located in close proximity to, and will serve similar objectives as, the Transource PA Furnace Run 500 kV substation. These later-approved facilities rendered the eastern portion of the Original 9A Project redundant and no longer necessary.

As such, and after additional analysis and following review in PJM's Transmission Expansion Advisory Committee ("TEAC"), which I describe further below, the PJM Board

approved a modified scope of Project 9A in July 2025 and indicated that PJM would proceed only with the still-needed new Rice-Ringgold transmission line. That line will be sited to extend approximately 29 miles, connecting the existing Ringgold Substation located near Smithsburg, Washington County, Maryland, and the new Rice Substation to be located in Franklin County, Pennsylvania.

As further explained in the direct testimony of Mr. Eric S. Williams (Transource PA Statement No. 2) Transource PA will construct, own, operate, and maintain the Pennsylvania portion of the new transmission lines associated with Project 9A West and Transource PA's affiliate, Transource MD, will construct, own, operate, and maintain the Maryland portion of the new transmission lines associated with Project 9A West.

Q. WHAT WAS YOUR ROLE IN THE DEVELOPMENT OF THE ORIGINAL PROJECT 9A AND THE CURRENT PROJECT 9A WEST?

A. On December 27, 2017, PJM Witness Mr. Paul McGlynn submitted Direct Testimony in the proceedings before the PaPUC in Docket Nos. A-2017-2640195 and A-2017-2640200 concerning the Original Project 9A. In his testimony, he described PJM and its RTEP. More specifically, Mr. McGlynn discussed Original Project 9A in the context of the RTEP and why Original Project 9A was needed and selected as a market efficiency project to alleviate transmission congestion in eastern PJM. Mr. McGlynn eventually moved to another role within PJM and has since retired.

Since that time, and still today, I have been responsible for the market efficiency analysis associated with Original Project 9A. Because of my role in market operations and my involvement with the market efficiency analysis, I offered rebuttal testimony in the PaPUC proceeding at Docket Nos. A-2017-2640195 and A-2017-2640200, adopting parts

of Mr. McGlynn's Direct Testimony relative to PJM's regional planning process for the Original Project 9A.

In my current role as Senior Director, PJM Forward Market Operations, I continue to have managerial responsibility for the PJM staff that performed the 2025 re-evaluation of costs and benefits establishing the continued need for the 9A West Project that PJM continues to include in the RTEP for market-efficiency reasons.

Q. WHAT TOPICS WILL YOU DISCUSS IN YOUR TESTIMONY?

A. In general terms, I will explain that, as a federally approved independent RTO, PJM is responsible for maintaining the reliable and efficient operation of the electric transmission system in the PJM Region. In order to maintain reliable transmission service, PJM prepares an annual RTEP and applies applicable reliability criteria, including North American Electric Reliability Corporation ("NERC")[3] Reliability Standards, to evaluate the reliability of the PJM transmission system. PJM determines the required transmission enhancements and expansions that are needed to maintain transmission system reliability in compliance with the NERC Reliability Standards and other applicable reliability criteria.

In addition to the reliability analysis, PJM's RTEP includes a separate market efficiency analysis to identify proposed transmission facilities that may have economic wholesale market benefits, such as by reducing transmission congestion. Pursuant to FERC4 authority, PJM directs, as appropriate, the construction of new transmission projects or upgrades to maintain grid reliability and efficiency. In my direct testimony, I

[3] NERC is defined further below.

[4] FERC is an independent agency that regulates the interstate transmission of electricity, natural gas, and oil. FERC also reviews proposals to build liquefied natural gas terminals and interstate natural gas pipelines as well as licensing hydropower projects. See https://www.ferc.gov/what-ferc-does. FERC has approved the PJM RTEP process.

will show that the PJM planning process is open to the public, transparent, and collaborative.

I will also describe the continuing need for Project 9A West (which is a portion of Original Project 9A). PJM's 2025 study results show that the Project 9A West portion of Original Project 9A remains needed, and PJM supports Transource PA's request for the PaPUC's siting approval of Project 9A West in this proceeding to address longstanding transmission congestion concerns within the PJM Region.

Q. WHAT IS TRANSMISSION CONGESTION?

A. Transmission congestion, also called "congestion," results from constraints in the transmission system. It occurs when available, least-cost energy cannot be delivered to all load (*i.e.*, wholesale customers demanding electricity) because existing transmission facilities are inadequate to deliver that energy to one or more areas. PJM provides resources that explain the concept of transmission congestion.[5]

The consequence of transmission congestion is that lower-cost generation cannot serve the load, requiring PJM to dispatch higher-cost generation in the transmission-constrained area to meet the load. Therefore, wholesale customers in transmission-constrained areas experience higher costs for power as a result of congestion.

As I will explain further in this testimony, the Original Project 9A and the portion of that project now called Project 9A West are needed to reduce transmission congestion that prevents lower-cost electrical generation from serving load in constrained areas.

[5] *See, e.g.*, Transmission Congestion Can Increase Costs, available at https://www.pjm.com/-/media/DotCom/about-pjm/newsroom/fact-sheets/congestion-fact-sheet.pdf.

Q. HOW IS YOUR TESTIMONY ORGANIZED?

A. My testimony is organized into the following sections:

- Section I provides the reasons why PJM selected Original Project 9A to address, among other things, persistent transmission congestion across the Maryland and Pennsylvania border.
- Section II includes an overview of PJM, including its role as an independent RTO.
- Section III describes PJM's transmission planning process.
- Section IV describes PJM's market efficiency analysis as part of the RTEP process.
- Section V explains how application of PJM's RTEP process identified the need for the Original Project 9A, and today's continuing need for Project 9A West.

II. SUMMARY OF REASONS WHY PJM SELECTED ORIGINAL PROJECT 9A

Q. PLEASE SUMMARIZE THE PRIMARY REASONS FOR PJM'S DETERMINATION OF NEED FOR ORIGINAL PROJECT 9A.

A. In this direct testimony, I will describe the process PJM uses to perform its RTEP market efficiency analysis. This background helps explain why PJM found the Original Project 9A to be needed and continues to find Project 9A West needed. Project 9A West was originally part of Project 9A, and the reasons why Project 9A was selected remain relevant and compelling today with respect to Project 9A West:

- In October 2014, PJM opened the 2014/15 Long Term Proposal Window to solicit proposals to address, among other things, transmission congestion across the AP-South Interface (an area of the PJM transmission grid including the Pennsylvania and Maryland border, described more in detail below) and related constraints (collectively, the "AP-South Reactive Interface"). This transmission congestion

has existed for years and continues to result in significant transmission congestion costs ultimately borne by residents, commercial businesses and industrial customers in the eastern part of the PJM Region.

- After extensive evaluation of alternatives and review with stakeholders, PJM selected the Original Project 9A (of which, as noted, Project 9A West is a part) to address the needs identified in PJM's 2014/15 Long Term Proposal Window because it provided the highest Benefit/Cost Ratio in terms of reductions in load market payments compared to the project's cost. In addition, examinations of other metrics and a range of modeled assumptions showed the project was expected to produce high levels of transmission congestion savings, and reductions in the variable cost of generation supply to the market. The Original Project 9A was approved by the PJM Board on August 2, 2016.
- On June 30, 2020, the Maryland Public Service Commission approved a settlement agreement regarding the Maryland portions of the Original Project 9A pending regulatory approvals by the PaPUC and final approval by the PJM Board of Managers.
- On May 24, 2021, the PaPUC rescinded Transource PA's provisional certificate of public convenience associated with the Pennsylvania portion of the Original Project 9A, which PaPUC had issued in 2018. Litigation in the courts followed.
- On September 22, 2021, the PJM Board endorsed PJM's recommendation to suspend the Original Project 9A and remove the project from the RTEP base models beginning in 2022, pending further developments in the regulatory process, in order to allow PJM to plan for system-wide reliability impacts and interconnection queue

analysis while legal appeals and challenges relating to the Pennsylvania portion of the Original Project 9A were pending before the courts.

Original Project 9A remained in suspension through 2024, and not part of the RTEP base models.

As described more fully in my testimony below, PJM re-evaluations in the RTEP process in 2025 identified that Project 9A West—but not the eastern portion of the Original Project 9A—was still needed to alleviate transmission congestion in PJM's Region.

III. DESCRIPTION AND OVERVIEW OF PJM

Q. PLEASE DESCRIBE PJM.

A. PJM is an independent RTO regulated by FERC. As a FERC-approved RTO, PJM is responsible for the planning, operation, and reliability of the interstate electric transmission system under its functional control, which spans all or portions of 13 states and the District of Columbia in the mid-Atlantic region.[6] PJM's mission is to provide reliable electricity through competitive markets and to plan the system for the future. The PJM system serves approximately 67 million people across 13 states and the District of Columbia, and PJM dispatches more than 185,989 megawatts ("MW") of generation capacity over more than 88,417 miles of transmission lines.

PJM presently has more than 1,110 members. These members include generation owners, transmission owners ("TOs"), electricity distributors, other suppliers, and end-use consumers.[7] PJM has no financial or ownership interest in any PJM member. PJM's role

[6] The PJM Region includes all or portions of Delaware, District of Columbia, Maryland, New Jersey, Ohio, Pennsylvania, Virginia and West Virginia, and portions of Illinois, Indiana, Kentucky, Michigan, North Carolina, and Tennessee. The PJM Region and its transmission zones are shown in Attachment J to the PJM Tariff.

[7] PJM also has stakeholders. PJM stakeholders include PJM members, certain state officials and

as a federally regulated RTO means that it acts independently and impartially in operating and planning the regional transmission system and in overseeing the wholesale electricity market.

Q. WHAT IS THE BASIS FOR PJM'S AUTHORITY TO CARRY OUT ITS RESPONSIBILITIES?

A. PJM is one of a handful of FERC-approved and federally regulated RTOs. PJM has specific duties and responsibilities established by federal law and FERC decisions, and by PJM's own FERC-accepted tariffs, agreements, and procedures. PJM's duties include, among other things, maintaining the reliability of the transmission grid in the PJM Region, ensuring the efficiency of energy markets in its region, and operating the regional transmission system in a manner consistent with the applicable laws, regulations, and tariffs. PJM's authority with respect to its planning process is based on its role as a FERC-approved RTO and on its authority and responsibilities under the PJM Operating Agreement, the PJM Tariff, and the PJM Consolidated Transmissions Owners Agreement, each of which has been filed with and accepted by FERC.

PJM is also responsible for implementing other standards and regulations. For example, PJM is responsible for planning the regional transmission system for the provision of reliable electric service in accordance with NERC Reliability Standards, as well as PJM and Transmission owner reliability and operational criteria.

PJM is registered in the ReliabilityFirst and SERC regions for the following reliability functions, as defined in the NERC Reliability Functional Model: Balancing

advocates, and others. PJM stakeholders have a "seat at the table" to discuss PJM's operations, markets and reliability, as well as issues concerning the broader electricity industry.

Authority, Interchange Authority, Planning Coordinator, Reliability Coordinator, Resource Planner, Transmission Operator, Transmission Planner, and Transmission Service Provider.

Q. WHAT BENEFITS DO MEMBERS DERIVE FROM PJM MEMBERSHIP?

A. PJM operates and plans the transmission system as a single system. This means that PJM does not consider corporate and state boundaries when taking operational action or making planning decisions. Considerable benefits accrue to PJM's members and their customers through PJM's functions, including its centralized security-constrained economic dispatch, reserve requirements, and coordinated planning. These activities are estimated to produce approximately $5 billion per year in benefits and economic value for the region PJM serves.[8]

IV. PJM'S TRANSMISSION PLANNING PROCESS

Q. WHAT IS PJM'S ROLE IN TRANSMISSION PLANNING?

A. As part of its ongoing responsibilities as an RTO, PJM conducts its regional transmission planning pursuant to the RTEP Protocol in Operating Agreement, Schedule 6 ("RTEP Protocol"), which is designed to maintain the reliable and efficient operation of the bulk electric system on a forward-looking basis. The RTEP evaluates transmission needs driven by multiple considerations, including reliability criteria, market efficiency, and public policy considerations. Reliability planning is undertaken to maintain compliance with NERC Reliability Standards, as well as additional relevant reliability and planning criteria to which PJM plans the PJM transmission system, to address forecasted violations of

[8] *See* The Value of PJM, available at https://www.pjm.com/-/media/DotCom/about-pjm/the-value-of-pjm.pdf.

thermal, voltage and stability limits. PJM has been applying the NERC Reliability Standards and the PJM deliverability standards, codified in the PJM Tariff and PJM Transmission Planning Manuals (Manuals 14A through 14H),[9] on a mandatory basis since the initiation of the RTEP process. PJM's public policy planning evaluates transmission solutions needed to support state or federal public policy objectives identified through the State Agreement or other processes.

Additionally, and as relevant to this proceeding, PJM also conducts market efficiency planning to identify transmission solutions that reduce the overall cost of serving load by alleviating congestion on the transmission system. Congestion occurs when lower-cost generation cannot be fully dispatched due to transmission constraints, resulting in the dispatch of higher-cost resources and increased energy costs to consumers. Market efficiency projects are designed to relieve such constraints where doing so produces net economic benefits.

As set forth in Operating Agreement, Schedule 6, section 1.5.7, PJM's market efficiency analysis is performed using production cost simulation models that compare a baseline system against scenarios that include potential system upgrades. These studies evaluate the extent to which a proposed project reduces congestion over a defined planning horizon. The benefits of a project are quantified as the reduction in total system production costs, while the costs include the capital and operating costs of the proposed transmission facility. PJM applies a benefit-to-cost ratio framework to ensure that only projects that are expected to produce net benefits to customers are selected.

[9] The PJM Transmission Planning Manuals are available on PJM's website at https://www.pjm.com/library/manuals.

Through this process, PJM identifies transmission upgrades that not only enhance the physical capability of the system, but also improve its economic performance. Market efficiency projects, therefore, play an important role in making sure that customers benefit from access to the lowest-cost generation resources across the PJM Region.

Q. WHAT IS THE BASIS OF PJM'S TRANSMISSION PLANNING FUNCTION AND AUTHORITY?

A. PJM's authority and obligation to perform this function are established in the FERC-approved PJM Tariff, PJM Operating Agreement and other related agreements, and PJM business manuals. The transmission planning process is overseen by the PJM Board and regulated by FERC.

Q. DOES PJM HAVE A WRITTEN PROTOCOL FOR ITS PLANNING PROCESS?

A. Yes. The RTEP Protocol and PJM's planning role are set forth in Schedule 6 of the PJM Operating Agreement. The purpose and objective of Schedule 6 is stated at section 1.1 and states in pertinent part as follows:

> This Regional Transmission Expansion Planning Protocol shall govern the process by which the Members shall rely upon the Office of the Interconnection to prepare a plan for the enhancement and expansion of the Transmission Facilities in order to meet the demands for firm transmission service, and to support competition, in the PJM Region. The [RTEP] . . . to be developed shall enable the transmission needs in the PJM Region to be met on a reliable, economic and environmentally acceptable basis.

Q. WHAT ARE THE PRIMARY ELEMENTS OF PJM'S PLANNING PROCESS?

A. The RTEP process integrates transmission, generation and demand-side resources to address transmission system constraints involving reliability and persistent congestion. The result is one process that integrates many system factors, including:

- Forecasted load growth, demand-side-response efforts and distributed generation additions;
- Interconnection requests by developers of new generating resources and merchant transmission facilities;
- Solutions to mitigate transmission congestion and to ensure adequate allocation and funding of long-term financial transmission rights;
- Long-term firm transmission service requests;
- Generation retirements and other deactivations;
- Transmission Owner-initiated improvements; and
- Load-serving entity capacity plans.

This process identifies the projects that PJM staff recommends to the PJM Board as more efficient or cost-effective solutions (which is the standard required by FERC Order No. 1000 and PJM's FERC-accepted Operating Agreement, Schedule 6) to address the various transmission system needs. Upon considering the recommendations, the PJM Board then uses its authority pursuant to PJM's Operating Agreement to designate to incumbent Transmission Owners or Nonincumbent Transmission Developers[10] the responsibility to construct, own, operate, and maintain the projects it approves.

[10] Non-incumbent transmission developers are "(1) a transmission developer that does not have an existing Zone in the PJM Region as set forth in PJM's Tariff, Attachment J; or (2) a TO that proposes a transmission project outside of its existing Zone in the PJM Region, as set forth in Tariff, Attachment J."

Q. DOES THE RTEP PROCESS INVOLVE OTHERS OUTSIDE OF THE PJM ORGANIZATION AND ITS MEMBERS?

A. Yes. The RTEP Protocol provides for robust and continuous engagement in the RTEP process from start to finish. This engagement is primarily conducted through PJM's Transmission Expansion Advisory Committee ("TEAC") and the Subregional RTEP Committees[11] that provide the primary forum for the ongoing exchange of ideas, discussion of issues, and presentation of planning findings between PJM staff and stakeholders.

The TEAC operates under specific provisions of the PJM Operating Agreement. TEAC activities are at the core of stakeholder input in the RTEP process. The scope of the TEAC's responsibility includes the review and the provision of comments and input on the following:

- Scope and assumptions of RTEP studies, including the review of PJM's identification of reliability violations and its economic/market efficiency analysis;
- RTEP analysis at defined points during the RTEP cycle;
- RTEP recommendations to be proposed to the PJM Board for approval; and
- Specified RTEP process matters as requested by the PJM Board.

TEAC participation is open to all Transmission Owners, Nonincumbent Developers, transmission customers, all PJM members, transmission customers, any other entity proposing to provide transmission facilities to be integrated into the PJM Region, all PJM members, representatives of state commissions, the agencies and offices of state consumer advocates of states in the PJM Region, *and any other interested parties*. This

[11] The Subregional RTEP Committees focus on local planning concerns, focusing on below 230 kV transmission facilities.

broad group of constituents fosters a wide range of opinions, comments and advice on RTEP development and recommendations for PJM Board approval.

Following the presentation of analysis assumptions or results and project recommendations to the TEAC, stakeholders are invited to provide written comments and feedback. These comments are provided to the PJM Board for its consideration and serve as the basis for on-going dialogue at subsequent TEAC meetings. This process was used in the development of Project 9A West.

Q. AFTER THE PROCESS IS COMPLETE, HOW IS THE RTEP APPROVED?

A. Following completion of PJM's planning analyses and stakeholder engagement process, PJM presents the recommended transmission solutions to the PJM Board for review and approval. The PJM Board's consideration is informed by the underlying technical analyses, the identified system needs, the evaluation of alternatives, and the stakeholder feedback received through the TEAC and Subregional RTEP Committees processes. PJM staff provide the Board with its recommended transmission solutions, including the appliable planning drivers—reliability, market efficiency or public policy—and the rationale supporting the proposed solutions. The Board exercises independent judgment in determining whether to approve the recommended solutions. Upon approval by the Board, the selected projects are incorporated into the RTEP. Approval for the current projects, and historical projects, has always occurred through a consensus of the PJM Board.

Q. FOR CONTEXT, CAN YOU SUMMARIZE THE NATURE AND EXTENT OF THE RTEP PROJECTS ORDERED BY THE PJM BOARD SINCE THE INCEPTION OF THE RTEP PROCESS?

A. Since the RTEP was implemented in 2000, the PJM Board has approved transmission system enhancements or expansions totaling approximately $70.8 billion to ensure compliance with planning criteria set by NERC as well as criteria of regional and local Transmission Owners. This includes $61.1 billion of baseline transmission enhancements throughout the RTO region to address market efficiency congestion relief and $9.7 billion of network facilities enabling new generation to interconnect reliably.[12]

Q. HOW DOES THE PJM RTEP PROCESS DETERMINE WHETHER THERE IS A NEED FOR A NEW TRANSMISSION FACILITY?

A. A proposed project must meet one or more specific criteria as set forth in the PJM Operating Agreement to be included in the RTEP. These criteria include:

1. Reliability standards. The RTEP must "conform at a minimum to the applicable reliability principles, guidelines and standards of NERC, ReliabilityFirst

[12] Baseline transmission enhancements are regional transmission projects in PJM's footprint that are required to address the following: (i) NERC, SERC, ReliabilityFirst, PJM, and other applicable reliability criteria, including operational performance; (ii) individual Transmission Owner planning criteria as filed in the Transmission Owner's respective FERC Form No. 715; (iii) criteria to address economic constraints; and (iv) State Agreement Approach (public policy) expansions or enhancements as set forth in the Operating Agreement at Schedule 6, section 1.5.9. After PJM identifies a baseline transmission need—including for market efficiency—PJM may open a competitive proposal window, depending on a project's required in-service date, voltage level, and scope.

Corporation ("RFC"),[13] and SERC Reliability Corporation ("SERC"),[14] and those of the transmission owners in accordance with the planning and operating criteria and other procedures detailed in the PJM Manuals.[15]

2. Market efficiency. If new facilities can lower costs to customers, and benefits of the project exceeds its costs by or above a certain required ratio, then PJM has the authority to require new transmission facilities to be built.[16]

3. Operational performance. PJM can act when difficult, complex, or restrictive operating actions (*e.g.*, excessive switching, complex or limiting protection schemes) are required to meet minimum reliability criteria.[17]

4. Addressing long-term congestion hedging. PJM uses a locational pricing system to manage congestion. Transmission facilities must be built as required to maintain feasibility of Stage 1A ARR, a key feature of this system.[18]

5. State Public Policy through the State Agreement Approach specified in the Operating Agreement.

[13] RFC is one of six regional organizations which, in conjunction with the NERC, are known as the Electric Reliability Organization ("ERO") Enterprise, responsible for ensuring the reliability and security of the North American Bulk Electric System. RFC promotes the reliability and security of the electric grid through standards, outreach, training and analysis, that includes partnership with communities and experts. RFC is based in Cleveland, Ohio, and has a footprint that includes the Great Lakes and Mid-Atlantic areas of the United States.

[14] SERC is specifically responsible for the reliability and security of the electric grid across the southeastern and central regions of the United States. This area covers approximately 630,000 square miles and serves a population of more than 100 million. It includes all or portions of Florida, Georgia, Alabama, Mississippi, Louisiana, Texas, Oklahoma, Arkansas, Missouri, Iowa, Illinois, Kentucky, Tennessee, Virginia, North Carolina, and South Carolina.

[15] Section 1.2(d) of Schedule 6 to the PJM Operating Agreement

[16] Section l.5.7(d) of Schedule 6 to the PJM Operating Agreement. There are strict metrics governing market efficiency projects and in PJM the Benefit/Cost Ratio must be greater than or equal to 1.25.

[17] Section l.5.3(d) of Schedule 6 to the PJM Operating Agreement.

[18] Section 1.5.3(h) of Schedule 6 to the PJM Operating Agreement.

Finally, the RTEP also includes enhancements or expansions required as a result of coordination with other neighboring planning regions.[19]

Q. ON WHAT BASIS DID PJM THROUGH THE RTEP PROCESS DETERMINE THAT PROJECT 9A AND PROJECT 9A WEST WERE NECESSARY?

A. The Original Project 9A and more recently Project 9A West were deemed necessary under the RTEP's market efficiency analysis, which is set forth in the RTEP Protocol (Operating Agreement, Schedule 6, section 1.5.7).

V. PJM'S MARKET EFFICIENCY ANALYSIS

Q. PLEASE PROVIDE AN OVERVIEW OF PJM'S MARKET EFFICIENCY PROCESS.

A. PJM's market efficiency analysis is performed as part of the overall RTEP process to accomplish the following two objectives:

1. Determine which reliability upgrades, if any, have an economic benefit if accelerated (*i.e.*, placed in service prior to their reliability need date).

2. Identify new transmission upgrades that may result in economic benefits.

PJM performs a market efficiency analysis under a 24-month planning cycle. Following the availability of the appropriate updated RTEP power-flow model resulting from the reliability analysis, PJM performs its market efficiency analyses to identify market efficiency needs on the PJM system. PJM solicits proposals to address identified market efficiency issues at the end of the first year of the 24-month cycle. During the second year of the 24-month cycle, the market efficiency models are updated with the latest

[19] Section 1.5.5 of Schedule 6 to the PJM Operating Agreement.

assumptions, and the proposals are evaluated using those updated models. As a result, there is a mechanism in place for regularly identifying transmission enhancements or expansions that will relieve relevant future transmission congestion as forecasted in the market efficiency analysis.

In the market efficiency analysis, PJM compares the costs and benefits of the economic-based transmission improvement proposals in its Region. To calculate the benefits of these potential economic-based enhancements, PJM performs and compares market simulations with and without the newly proposed economic-based enhancements for selected future years within the RTEP's 15-year planning horizon. The relative benefits and costs of the economic-based enhancement or expansion must meet the Benefit/Cost Ratio threshold test to be included in the RTEP recommended to the PJM Board for approval. This test and its implementation are described in detail below.

PJM presents all the RTEP market efficiency enhancements and annual re-evaluations to the TEAC for review and comment. Subsequent to TEAC review, PJM considers stakeholder comments and presents the final recommended market efficiency projects and annual re-evaluations to the PJM Board, along with the advice, comments, and recommendations of the TEAC, for Board approval.

Q. WHO IS ELIGIBLE TO BE DESIGNATED TO DEVELOP A PROJECT TO ADDRESS A NEED IDENTIFIED AS PART OF THE MARKET EFFICIENCY ANALYSIS?

A. While not a requirement to propose competitive projects, an entity must pre-qualify for Designated Entity[20] status in order to construct, own, operate, maintain and finance competitive planning projects, including market efficiency projects. The prequalification requirements are set forth in the RTEP Protocol (Operating Agreement, Schedule 6, section 1.5.8(a)). Any qualifying entity (consistent with PJM Operating Agreement Schedule 6 provisions) may formally submit market efficiency proposals in the RTEP proposal window for evaluation under the market efficiency analysis. All proposals submitted in a competitive window are posted on the PJM Website.

Q. PLEASE DESCRIBE IN DETAIL PJM'S MARKET EFFICIENCY ANALYSIS.

A. PJM's market efficiency analysis involves several phases. The process begins with the determination of the transmission congestion drivers that may signal market inefficiencies. PJM identifies, collects, and publicly posts relevant drivers. In addition, PJM performs market simulations to determine projections of future congestion based on the anticipated RTEP upgraded system. This process facilitates concurrent PJM and stakeholder review of the same information PJM considers in preparation for PJM's solicitation of proposals for system upgrades that may economically alleviate market inefficiencies. Following the evaluation of transmission congestion drivers and solicitation of proposals, PJM evaluates

[20] For purposes of this testimony, a "Designated Entity" means an entity, including an existing Transmission Owner or Nonincumbent Developer, designated by PJM with the responsibility to construct, own, operate, maintain, and finance projects developed pursuant to the RTEP Protocol (Operating Agreement, Schedule 6, section 1.5.8), including market efficiency projects.

the economic costs and benefits of any identified new potential upgrades targeted specifically at economic efficiency. This is essentially a competitive process that selects the more efficient or cost-effective solution.

Q. PLEASE DESCRIBE IN GREATER DETAIL THE BENEFIT/COST ANALYSIS THAT PJM PERFORMS AS PART OF ITS MARKET EFFICIENCY ANALYSIS.

A. PJM uses a Benefit/Cost Ratio test to determine whether an economic-based enhancement or expansion (*i.e.*, a market efficiency project) will be included in the RTEP. Specifically, for a proposed market efficiency project to be included in the RTEP recommended to the PJM Board for approval, the relative benefits and costs of the economic-based enhancement or expansion must meet or exceed a Benefit/Cost Ratio threshold of at least 1.25:1. That means, in non-technical terms, that there must be at least $1.25 of benefit to $1.00 of cost for the project to be included in the RTEP.

The Benefit/Cost Ratio is calculated by dividing the present value of the total annual benefit for each of the first 15 years of the life of the enhancement or expansion, on the one hand, by the present value of the total annual cost for each of the first 15 years of the life of the enhancement or expansion, on the other. Assumptions for determining the present value of the benefits and costs (*e.g.*, discount rate and annual revenue requirement) are among the assumptions that are considered by the PJM Board each year to be used in the economic planning process. The Benefit/Cost Ratio is expressed as follows:

> Benefit/Cost Ratio = [Present value of the Total Annual Enhancement Benefit for the 15 year period starting with the RTEP Year (defined as current year plus five) minus benefits for years when the project is not yet in-service] ÷ [Present value of the Total Enhancement Cost for the same 15 year period]

The purpose of a Benefit/Cost Ratio threshold is to hedge against the uncertainty of estimating benefits in the future and to provide a degree of assurance that a project with a 15-year net benefit near zero will not be approved. At the same time the threshold is not so restrictive as to unreasonably limit the economic-based enhancements or expansions that would be eligible for inclusion in the RTEP.

Q. HOW IS THE BENEFIT COMPONENT OF THE BENEFIT/COST RATIO CALCULATED?

A. The benefit component of the Benefit/Cost Ratio ("Total Annual Enhancement Benefit") is the sum of two metrics: the "Energy Market Benefit" and the "Reliability Pricing Model ("RPM") Benefit." By including these two metrics, the analysis captures the benefits to customers in the PJM Region arising from reductions in both energy prices and capacity prices attributable to an economic-based enhancement or expansion. This comprehensive test captures customers' benefits in both the energy and capacity markets, reflecting their responsibility to obtain reasonably priced energy and adequate capacity.

Q. HOW DOES PJM CONDUCT THE ENERGY MARKET BENEFIT ANALYSIS?

A. PJM conducts the energy-market benefit analysis by using an energy market simulation tool that models the hourly least-cost, security-constrained commitment and dispatch of generation over a future annual period. A detailed generation, load, and transmission system model is used as input into the simulation tool. This simulation mimics the hourly commitment and dispatch of generation to meet load, while recognizing constraints imposed on the economic commitment and dispatch of generation by the physical limitations of the transmission system. PJM performs and compares market simulations

with and without the proposed enhancement for selected future years within the planning horizon of the RTEP. This analysis measures the benefits of proposed economic-based transmission enhancements. A comparison of these simulations identifies the annual economic impact of the enhancement for each of the future study years. An interpolation and extrapolation of these results provides a projection of annual benefits for each of the first 15 years of the life of the enhancement.

The Energy Market Benefit component of the Benefit/Cost Ratio for Regional Projects is expressed as:

Energy Market Benefit = [.50] * [Change in Total Energy Production Cost] + [.50] * [Change in Load Energy Payment]

The Energy Market Benefit component of the Benefit/Cost Ratio for Lower Voltage Projects is expressed as:

Energy Market Benefit= [1] * [Change in Load Energy Payment]

The Change in Total Energy Production Cost is the difference in estimated total annual fuel costs, variable operation and maintenance ("O&M") costs, and emissions costs of the dispatched resources in the PJM Region without and with the enhancement or expansion. Costs for purchases from outside of the PJM Region and sales to outside the PJM Region will be captured if appropriate. Purchases will be valued at the Load Weighted Locational Marginal Price ("Load Weighted LMP") and sales will be valued at the Generation Weighted Locational Marginal Price ("Generation Weighted LMP").

The Change in Load Energy Payment is the difference between the annual sum of the hourly estimated zonal load megawatts for each PJM transmission zone multiplied by

the hourly estimated zonal Locational Marginal Price ("LMP")[21] for each PJM transmission zone[22] minus the value of Transmission Rights for each PJM transmission zone with and without the economic-based enhancement or expansion. In determining the Change in Load Energy Payments, only zones that show a decrease will be considered in determining the Change in Load Energy Payments.

Q. HOW IS THE COST COMPONENT OF THE BENEFIT/COST RATIO CALCULATED?

A. The annual cost of the enhancement is the revenue requirement of the enhancement. The enhancement's annual revenue requirement is developed by PJM and presented to the TEAC for discussion and review. As stated earlier, the benefits and costs will be considered over the same time period (for each of the first 15 years of the life of the expansion, starting with the RTEP Year, which is defined as the current year plus five).

Q. AFTER APPROVAL, DOES PJM CONTINUE TO EVALUATE MARKET EFFICIENCY PROJECTS?

A. Yes. To ensure that projects selected by the PJM Board for market efficiency purposes continue to be economically beneficial, both the costs and benefits of these projects will be reviewed periodically, nominally on an annual basis up until the point at which either (a) a certificate of public convenience and necessity or its equivalent is granted by the state or relevant regulatory authority in which such market efficiency project will be located; or (b)

[21] LMP is the marginal price for energy at the location where the energy is delivered or received. LMP is a pricing approach that addresses transmission system congestion and loss costs, as well as energy costs.

[22] PJM zones are predominantly based on the service territories of major transmission owners (*i.e.*, utilities) within the PJM Region. For market efficiency and emergency procedures, PJM organizes these zones into three major regional groups: Mid-Atlantic Region; Western Region; and Southern Region.

if a certificate of public convenience and necessity or its equivalent is not required by the state or relevant regulatory authority in which a market efficiency project will be located, once construction activities commence at the project site. Substantive changes in the costs and/or benefits of the approved market efficiency projects will be reviewed with the TEAC at a subsequent meeting to determine if these projects continue to provide economic benefits relative to their costs and should remain in the RTEP.

Q. DOES PJM EVALUATE RELIABILITY BENEFITS OF PROPOSED MARKET EFFICIENCY PROJECTS IN ITS RTEP ANALYSIS?

A. As a matter of course, PJM does not consider or study the potential reliability benefits of projects selected on a market efficiency basis. But projects approved on a market efficiency basis can and often have reliability benefits. PJM does perform reliability analysis on all Market Efficiency projects before they are approved to ensure the projects don't cause adverse reliability impacts.

VI. SELECTION OF PROPOSED PROJECT

Q. PLEASE DESCRIBE HOW THE ORIGINAL PROJECT 9A WAS IDENTIFIED THROUGH PJM'S MARKET EFFICIENCY ANALYSIS.

A. As part of the 24-month RTEP cycle ending December 31, 2015, PJM evaluated market efficiency proposals submitted as part of the long-term proposal window opened from October 30, 2014, through February 27, 2015. The window sought technical solution alternatives to certain reliability criteria violations as well as alleviation of certain market efficiency congestion drivers identified in PJM's long-term simulation results.

Q. PLEASE DESCRIBE CONGESTION AS USED IN THIS CONTEXT.

A. As described above, market efficiency congestion (*i.e.*, transmission congestion) occurs when the least costly resources that are available to serve load in a given region cannot be dispatched because the physical limits of certain transmission facilities constrain power flow on the system. This is particularly true in PJM where power often flows from lower-priced generating resources in western zones to load centers in the East. The lowest-priced energy is often constrained from flowing freely to those load centers. When this occurs, PJM's system operator must dispatch higher-cost resources to serve load. This results in LMP differences and congestion on the system. The congestion generally increases system production costs and LMPs. It also results in increased wholesale customer payments for electric energy.

PJM's market efficiency studies look at persistent projected congestion over a 15-year planning horizon in order to identify the potential economic benefit of proposed transmission projects. PJM conducts market simulations that show the extent to which congestion is mitigated under a set of given assumptions including fuel costs, emissions costs, load forecasts, demand resource projections, generation projections and expected future transmission topology.

Q. PLEASE DESCRIBE THE CONGESTION PROBLEM PJM SOUGHT TO ADDRESS THROUGH ITS 2014/15 LONG-TERM PROPOSAL WINDOW.

A. The 2014/15 Long Term Proposal Window solicited proposals to address, among other things, congestion on the AP-South Reactive Interface and related constraints. The AP-South Reactive Interface is a set of four 500 kV lines that originate in West Virginia and terminate in Maryland and Virginia. The lines are depicted on the map below. The

primary goal of the proposal window was to solicit proposals to reduce congestion on the AP-South Reactive Interface and related constraints, which is one of the most historically congested flowgates in PJM.[23]

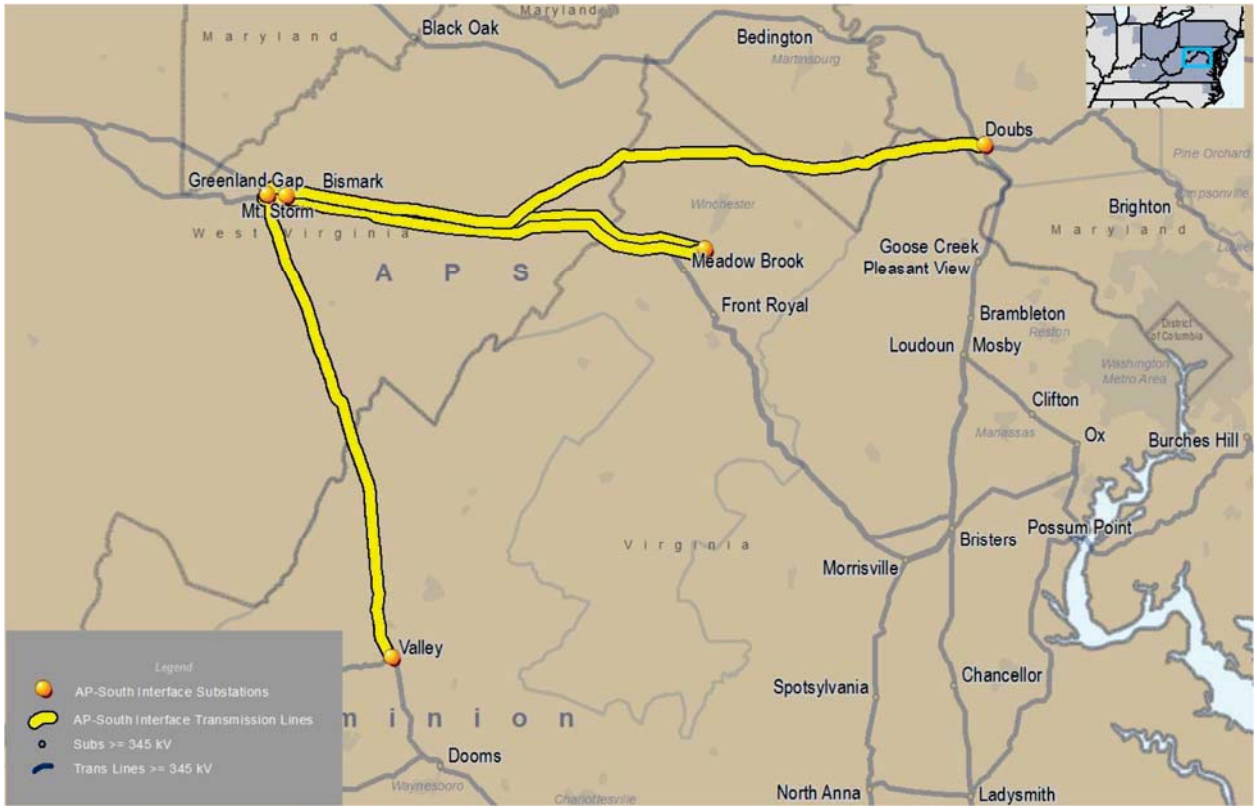


Figure 1: The AP-South Reactive Interface

The cost of congestion affecting the AP-South Reactive Interface since 2017 is shown on the following table, which also shows related congestion costs. The columns other than "AP South Congestion" show the historic costs of congestion on other transmission lines—

[23] A flowgate is a transmission facility or transmission element that limits the amount of power that can be reliably transferred over the bulk transmission system. A flowgate is typically a specified line, set of lines, or combination of lines and other transmission assets that link two nodes (busses) in the power system over which power flows.

not part of the AP-South Reactive Interface—that are in the same "electrical neighborhood" as the AP-South Reactive Interface.

	Congestion ($M)				
	AP South	Bla-Bed	Juniata-Dauphin 230 kV	Yorkana-Brunner Island 230 kV	Three Mile Island-Jackson 230 kV
2017	21.6	-	-	7.4	2.1
2018	20.5	-	-	1.3	1.6
2019	14.5	-	-	3.5	1.3
2020	0.4	-	2.5	-	0.7
2021	0.2	-	5.4	0.3	0.4
2022	122.2	63.8	51.1	-	-
2023	24.6	19.2	8.2	0.9	-
2024	69.1	36.3	5.3	6.3	4.6
2025	93.7	135.4	3.6	31.8	6.5
Total	$366.8	$254.7	$76.0	$51.5	$17.2

Q. PLEASE FURTHER DESCRIBE THE CONGESTION ASSOCIATED WITH THE REACTIVE INTERFACES, INCLUDING THE AP-SOUTH REACTIVE INTERFACE AND RELATED CONSTRAINTS.

A. Voltage or reactive constraints can limit the amount of energy that can be transferred into an area. In operations, PJM establishes limits on the total power flow over lines or combinations of lines to ensure that voltages on the system remain within acceptable levels. These lines or combinations of lines that are monitored to ensure voltages on the system remain within acceptable limits are often referred to as a reactive interface. Congestion occurs on these interfaces when more expensive generation must be turned on to control the flow across the lines that make up the reactive interface.

Specifically for the AP-South Reactive Interface and related constraints, if the sum of the flow on the four 500 kV lines that make up the interface exceeds calculated limits, it may result in a voltage collapse. In operations, PJM determines the AP-South Reactive

Interface and related constraints limitations based on system conditions. If the flows across the interface are expected to exceed the established limits, PJM operators will direct the operation of higher cost generation in Maryland and Virginia to increase output, while lower cost generation output will be reduced in other parts of PJM to prevent the flows across the interface from exceeding the established limits.

Original Project 9A (of which Project 9A-West is a part) was found to reduce congestion on the AP-South Reactive Interface and related constraints by providing a parallel path for energy to flow to eastern load centers, primarily in Maryland and Virginia. Project 9A West continues to provide this parallel path for energy to flow to those load centers, thus reducing congestion.

Q. HOW MANY MARKET EFFICIENCY PROJECTS WERE CONSIDERED AND APPROVED IN RESPONSE TO PJM'S 2014/2015 LONG-TERM PROPOSAL WINDOW?

A. There were 93 proposals submitted to address market efficiency needs in the 2014/15 Long-Term Proposal Window. Of those 93 proposals, 41 project proposals were submitted specifically to address congestion on the AP-South Reactive Interface.

Q. HAVE THE PROJECT 9A EAST OR PROJECT 9A WEST PORTIONS OF THE ORIGINAL PROJECT 9A BEEN BUILT?

A. No. The PaPUC denied Transource PA's separate applications for the siting of the proposed Project 9A in an order entered May 24, 2021, at PUC Docket Nos. A-2017-2640195 and A-2017-2640200. After the PUC rejected the siting of Original Project 9A in 2021, PJM placed Original Project 9A into a suspended status and removed the project

from the models in order to allow PJM to plan for system-wide reliability impacts and interconnection queue analysis while the PaPUC's decision was pending before the courts. In 2025, PJM completed its annual re-evaluation of Original Project 9A, determined that the western portion (Project 9A West) was still needed, and that the benefit/cost ratio of the Project 9A West had increased.

Q. PLEASE DESCRIBE THE STUDY AND ANALYSIS PJM CONDUCTED TO DETERMINE THAT PROJECT 9A WEST SHOULD BE REMOVED FROM SUSPENDED STATUS AND BUILT.

A. Since Original Project 9A was placed in suspension, a number of other RTEP projects have been approved or constructed that occupy the same physical location or right-of-way as the Original Project 9A's eastern components. Original Project 9A's Furnace Run-Conastone 230 kV lines are on the same rights-of-way that are now being utilized for the Chanceford-Conastone area 500 kV (2022 Window 3 Approved Projects). Furthermore, Chanceford 500 kV substation ties into the Peach Bottom-TMI 500 kV line, located in close proximity, and serves similar objectives to 9A-East's Furnace Run 500 kV substation but with 500 kV transmission. In 2025, this caused PJM to explore whether to modify Project 9A to remove the eastern portion and retain the western portion to, among other things, address the persistent congestion that remains on the AP-South Reactive Interface and related facilities.

Notwithstanding the developments in the RTEP that made proceeding with the eastern portion of Original Project 9A impractical given the subsequently approved upgrades, the 2025 re-evaluation of Original Project 9A and related configurations indicated a continued benefit-to-cost ratio greater than 1.25 for the configurations

constituting Project 9A West and demonstrating its continued need and ability to address persistent congestion at the AP-South Reactive Interface.

Although it was no longer practical to build the eastern portion of Original Project 9A, PJM's analysis determined that Project 9A West standing alone exceeded the 1.25 benefit-to-cost ratio—the 2025 re-evaluation showed a benefit-to-cost ratio of 3.85 for Project 9A West, with a projected load payment benefit of $1.107 billion over 15 years. Project 9A West therefore continues to address the market-efficiency planning needs on the AP-South Reactive Interface and related facilities to reduce persistent transmission congestion. Based on these findings, PJM recommended to the PJM Board in July 2025 that Original Project 9A be modified to remove the eastern portion and retain the western portion of the project.

On July 30, 2025, PJM obtained PJM Board approval to modify the scope of Original Project 9A to retain the western portion and remove the eastern portion of the project, terminate the project's suspended status, and restore the western portion of the project to the RTEP models.

Q. WHEN DID PJM APPROVE PROJECT 9A AND PROJECT 9A WEST?

A. The Original Project 9A was approved by the PJM Board on August 2, 2016, with an estimated cost of $320.19 million and a required in-service date by June 1, 2020. The expected 15-year congestion and load payment savings at that time were approximately $622 million and $269 million, respectively. As noted earlier, since that time continued system planning identified reliability-driven transmission solutions that addressed the needs previously served by the eastern portion of Original Project 9A. However, the congestion underlying the Project 9A West portion continues to require a solution, as

confirmed by PJM's most recent analyses in 2025. This is why, on July 30, 2025, the PJM Board approved PJM's recommendation to modify the scope of Original Project 9A to retain the western portion of Original Project 9A and remove the eastern portion of Original Project 9A, terminating the project's suspended status and restoring the project, as so modified, to the RTEP models.

Q. WERE TRANSOURCE PA AND/OR OTHER PJM TRANSMISSION OWNERS DIRECTED TO CONSTRUCT PROJECT 9A WEST BY A SPECIFIC DATE?

A. Yes. After the PJM Board approves a proposed market efficiency project, the successful project bidder (in this case, Transource Energy, Transource PA's direct parent) is obligated to complete the project once PJM and the successful entity execute a Designated Entity Agreement ("DEA"). Transmission projects that originate through an RTEP proposal window utilize the DEA to assign construction responsibility for the identified project to the "Designated Entity." The DEA is a two-party agreement between the Designated Entity and PJM. The terms and conditions of the agreement govern the construction period of the transmission project and define specific rights and obligations of the parties. On March 31, 2026, PJM and Transource Energy, on behalf of Transource PA and Transource MD, executed an amended DEA that is limited to the western portion of the Original 9A Project (*i.e.*, Project 9A West). On May 1, 2026, PJM filed the amended DEA with FERC for its review and acceptance.

Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

A. Yes, it does. However, I reserve the right to submit such additional testimony as may be necessary or appropriate.

VERIFICATION

I, Timothy J. Horger, Senior Director, PJM Forward Market Operations, hereby state that the facts set forth above 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).

Date: May 21, 2026

By: _____
Timothy J. Horger, Senior Director
PJM Forward Market Operations

STATEMENT 4

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 9A West Project in a Portion of Franklin County, Pennsylvania	:	Docket No. A-2026-_____

Transource Pennsylvania, LLC
9A West Project

Statement No. 4

Written Direct Testimony of
Barry A. Baker

Topics Addressed: **Summary of the Siting Study for the 9A West Project; and Selection of the Proposed Route for the 9A West Project.**

Dated: May 21, 2026

I. INTRODUCTION

Q. Please state your name and business address.

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

Q. By whom are you employed and in what capacity?

A. 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.

Q. What are your principal responsibilities in these positions?

A. In these roles, I am a Certified Project Manager and manage projects for siting and permitting of new electric transmission lines, substations, power plants, and other facilities. 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.

Q. Please explain what AECOM does in the context of transmission projects.

A. AECOM provides comprehensive life cycle services for electric transmission, substation, and distribution projects, from alternative route analyses, licensing and permitting, conceptual engineering, right-of-way services, and public involvement to detailed engineering and design, geotechnical engineering and subsurface investigation, and regulatory compliance.

Q. Please provide a summary of your education and professional work experience.

A. I received a Bachelor of Science with Honors degree in Environmental Science from the University of East Anglia in Norwich, England. A key focus of my education was on the use of Geographic Information Systems ("GIS") and computer applications for environmental problem solving. Additional continuing education relevant to my current position includes the following courses and programs:

- AECOM Lead Verifier for Environmental Planning and Permitting;
- AECOM Independent Technical Reviewer for Environmental Planning and Permitting;
- Over 50 Project Management Classes necessary for formal certification;
- Creating and Integrating Data for Natural Resource Applications (ESRI);
- Geoprocessing with ArcGIS Desktop (ESRI);
- Spatial Hydrology Using ArcView (ESRI);
- Introduction to ArcIMS (ESRI); and
- System Architecture Design for GIS (ESRI).

I have been employed by AECOM for the last twenty years in the roles previously discussed. In these positions, I have been responsible for electric transmission line siting studies, both as a Project Manager and as a technical lead for transmission line siting, as well as new power development throughout the eastern and mid-western U.S., including Pennsylvania, New Jersey, Maryland, New York, Connecticut, Ohio, Illinois, Virginia, Delaware, Massachusetts, Rhode Island, Wisconsin, West Virginia, and Florida. I also manage the Eastern U.S. Environmental Planning & Permitting Practice where I am responsible for a team of biologists, ecologists, and GIS specialists. Additionally, I am an AECOM Technical Lead designated for supporting and developing major electric transmission projects on the U.S. East Coast. Prior to joining AECOM, I held GIS and environmental development positions for other environmental and government consultants.

Q. Have you previously testified in public utility commission proceedings?

A. Yes. I have provided siting testimony before the Pennsylvania Public Utility Commission ("Commission" or "PaPUC"). I have also provided electric transmission line siting testimony before the New Jersey Board of Public Utilities ("BPU") and the Maryland Public Service Commission ("MD PSC"), along with testimony before the Virginia State Corporation Commission ("VA SCC"). These projects have included:

FirstEnergy: Carroll-Hunterstown Improvements Project (Docket #A-2025-3056951);

FirstEnergy: East Germantown–Germantown Project (Docket #A-2025-3053163);

PECO: Brandon Shores Project (Docket # A-2024-3051463);

FirstEnergy: Hunterstown–Orrtanna Project (Docket #A-2021-3025450);

FirstEnergy: Bedford North–Central City West Project (Docket #A-2016-2565296);

PPL Electric Utilities: Lake Naomi–Lake Harmony Project (Docket #A-2013-2367521);

PPL Electric Utilities: Northeast Pocono Project (Docket #A-2012-2340872);

PPL Electric Utilities: Blooming Grove - Jackson and Peckville - Jackson Project (Docket # A-2012-2304631);

PPL Electric Utilities: Effort Mountain Project (Docket #A-2010-2152104); and

PPL Electric Utilities: Appenzell Project (Docket #A-2010-2164476).

Transource PA, LLC: Independence Energy Connection Project (Docket #A-2017-2640195 & #A-2017-2640200);

Transource MD, LLC: Independence Energy Connection Project (Case No. 9471)

FirstEnergy: Carroll-Hunterstown Improvements Project (MD PSC Case Number 9803)

Public Service Electric & Gas ("PSE&G"): North Central Reliability Project (BPU Docket #EO11050323)

New Jersey Natural Gas: Southern Reliability Link Project (BPU Docket #GE15040402)

Dominion: Evergreen Mills 230 kV Transmission Line Project (Virginia) PUR-2019-00191

Q. What is the purpose of your direct testimony in this proceeding?

A. My direct testimony provides a summary of the Siting Study and explains the selection of the Proposed Route for the Rice-Ringgold 230 kV Transmission Line (the "9A West Project"), all in support for the application filed by Transource Pennsylvania, LLC's ("Transource PA") with the Commission for authorization to construct and site the 9A West Project ("Siting Application").

Q. Were any portions of the Siting Application prepared by you or under your supervision?

A. Yes. I am sponsoring certain attachments to Transource PA's Siting Application. Specifically, I am responsible for portions of the following attachments to the Siting Application:

- Attachment 1 Commission Cross-Reference
- Attachment 4 Siting Study
- Attachment 7 Agency Requirements

- Attachment 8 List of Government Agencies, Municipalities, and Other Public Entities Receiving the Application
- Attachment 9 List of Government Agencies, Municipalities and Other Public Entities Contacted
- Attachment 13 Agency Coordination

I was integrally involved in preparing these attachments to the Siting Application and provided oversight to AECOM technical staff that were also involved with their preparation. I also reviewed the complete Siting Application prior to assembly and submission to the Commission.

Q. What are your responsibilities in connection with the 9A West Project?

A. AECOM was involved with a prior siting assessment of this Study Area (as defined below) starting in 2016 in connection with what was then called the Independence Energy Connection ("IEC") Project. The alternative electric transmission line routes identified during that time were submitted in 2018 as part of a siting application filed with the PaPUC (the "2018 Siting Study") and, based upon our currently updated analyses and review, are predominantly still valid today. However, some modifications to Alternative Route A (as defined further below) were required near Chambersburg, Pennsylvania due to recent land development.

In 2025, Transource PA retained AECOM to re-evaluate the 2018 Siting Study to reflect current conditions applicable to the 9A West Project and create a new siting study (the "2026 Siting Study"). This process involved conducting field reviews to reassess the Study Area and collecting new stakeholder input, as described further below; updating the metrics analysis process to account for amended data sources; and updating the 2018 Siting

Study to address the new input and changes in the landscape and the data. The field reviews confirmed the need for modifying Alternative Route A due to new development and that the other alternatives, including the Proposed Route (as defined below), were still viable alternatives. Field reviews and evaluation of the revised metrics supported the 2018 Siting Study conclusion to select Alternative Route C as the Proposed Route for the current 9A West Project. I led the team that conducted the 2018 Siting Study and I am leading the current team updating the assessment and creating the new 2026 Siting Study for the 9A West Project. I was integrally involved in updating various attachments to the Siting Application, most notably Attachment 4 - Siting Study. In this capacity, I reviewed and provided oversight on all items prepared, coordinated and managed all team members, technical experts and writers, and helped assemble the documents submitted to the Commission.

Q. Please provide an overview of the 9A West Project.

A. As explained in the written direct testimony of Company witness Mr. Eric S. Williams (Transource PA Statement No. 2) and Mr. Timothy J. Horger (Transource PA Statement No. 3), PJM Interconnection L.L.C. ("PJM"), the regional transmission organization responsible for electrical grid planning and operation, identified a need to alleviate electrical network congestion constraints in Pennsylvania, Maryland, West Virginia, and Virginia. Electrical network congestion is a limitation on existing transmission line facilities that prevent power from flowing in the most optimal fashion for the economic efficiency of the system. To address these congestion constraints, PJM approved "Project

9A" as Baseline Upgrade Numbers b2743 and b2752. The 9A West Project is a major component of PJM's originally approved Project 9A.[1]

The 9A West Project approved by PJM involves (i) construction of the Rice 230/500 kV Substation and (ii) construction of the new Rice-Ringgold overhead, steel monopole, double-circuit 230 kV Transmission Line, typically 130 feet tall.

Upon receipt of all necessary approvals, the new Rice-Ringgold 230 kV Transmission Line will extend approximately 28 miles (of which 23.5 miles is located in PA), connecting the new Rice Substation to be located in Franklin County, Pennsylvania to the existing Ringgold Substation located near Smithsburg, Washington County, Maryland. This transmission line project is the 9A West Project that is the subject of the Siting Application. Specifically, Transource PA is seeking approval for the approximate 24-mile transmission line portion to be located in PA and the new Rice Substation to be located in PA.

As further explained by Mr. Eric S. Williams (Transource PA Statement No. 2) and Mr. Timothy Horger (Transource PA Statement No. 3), Transource PA is obligated and responsible for the construction, ownership, maintenance, and operation of the new Rice Substation in Pennsylvania, and the Pennsylvania portion of the new interstate Rice-Ringgold 230 kV Transmission Line between Maryland and Pennsylvania. Transource

[1]As noted by other witnesses, Transource PA's original request to obtain approval for the original 9A Project, also called the IEC Project (which included both 9A West and a related project called 9A East), was rejected by the PaPUC in an order entered May 24, 2021, at PaPUC Docket Nos. A-2017-2640195 (the 9A East Project) and A-2017-2640200 (collectively, "IEC Proceeding"). After the Commission's denial of the authorizations requested by Transource PA in the IEC Proceeding, transmission projects approved by PJM in 2022 utilizing existing rights of way and the Chanceford 500 kV substation eliminated the need for the Transource PA Furnace Run 500 kV substation, rendering the 9A East Project no longer necessary. Also, after the Commission's rejection of the IEC Project in 2021, PJM placed the IEC Project into a suspended status. In 2025, PJM completed a restudy of the IEC Project, determined that the 9A West Project portion of the IEC Project was still needed, and that the cost/benefit ratio of the 9A West Project had increased.

PA's affiliate, Transource Maryland, LLC ("Transource MD"), is obligated and responsible for the construction, ownership, maintenance, and operation of the Maryland portion (4.4 miles of transmission line) of the new interstate Rice-Ringgold 230 kV Transmission Line between Maryland and Pennsylvania.

II. SITING STUDY

Q. Please describe the purpose of the 2026 Siting Study prepared for the 9A West Project.

A. The purpose of the 2026 Siting Study was to confirm the feasibility of the Alternative Routes identified for the 9A West Project, evaluate potential impacts associated with these Alternative Routes, and identify a Proposed Route to be constructed to meet Transource PA's obligation to construct the 9A West Project. The Siting Study provides Transource PA with a means to assess the human/built environment, natural environmental, and engineering variables associated with the different Alternative Routes identified for a transmission line that connects the new Rice Substation to be located in Franklin County, Pennsylvania, and the existing Ringgold Substation located near Smithsburg, Washington County, Maryland, so that a Proposed Route can be determined. A complete copy of the Siting Study, along with supporting materials and maps, is provided as Attachment 4 to the Siting Application. Importantly, given the passage of time since the 2018 Siting Study was completed and the IEC Project was placed into suspension by PJM, to prepare for the current Siting Application and this testimony, we reviewed and corroborated the entire Siting Study and updated it, where necessary, to address any field conditions and/or updated data sources that might have changed since the earlier Siting Study was conducted. Additionally, new stakeholder engagement and open houses were conducted and input

collected to help evaluate routes. All the Attachments I am sponsoring, including Attachment 4 – Siting Study -- have been similarly corroborated and updated, where appropriate.

Q. Please summarize the route development process used in the Siting Study.

A. The Siting Team conducted a detailed siting analysis to determine a location for the 9A West Project transmission line route that best balances human/built, environmental, and engineering considerations. The route development process is inherently iterative with modifications made throughout the siting analysis as a result of the identification of new constraints, input from agencies, landowners, and other stakeholders, periodic re-assessment of routes with respect to the siting criteria, and adjustments to the overall route network. This analysis included the determination of a Study Area, the compilation of an environmental inventory, identification and analysis of the Alternative Routes and, finally, selection of a Proposed Route.

The first step in the route development process is to identify the Study Area. The Study Area is the region in which transmission line route alternatives could be sited to practicably meet the functional requirements of a project. The Study Area is selected based on professional judgment, field reviews, the geographic characteristics of the region, and the physical endpoints of the project (i.e., substation locations).

Once the Study Area has been determined, the next step is to identify large area constraints and opportunity features within the Study Area. These areas are typically identified using a combination of readily available public data sources. The Siting Team uses this information to first develop an array of Conceptual Routes for the project adhering to a series of general siting and technical guidelines and factors.

Where two or more of these Conceptual Routes intersect, Study Segments are formed between two common nodes or points of intersection. As the route development process progresses, the Siting Team continues to evaluate new data and consider stakeholder input and modifies, if necessary, the Study Segments included in the network. Eventually, feasible Alternative Routes are developed by assembling the Study Segments that best meet the siting guidelines and factors into individual routes for analysis.

Alternative Routes are assessed and compared with land uses, natural and cultural resources, human/built environment, and engineering and construction concerns. Ultimately, through a quantitative and qualitative analysis and comparison of the Alternate Routes, the Siting Team identifies a Proposed Route.

A detailed description of the sources of information used to develop data for the Siting Study is provided in Appendix A of Attachment 4 to the Siting Application. A detailed description of the route development process used for the 9A West Project is provided in Section 2.0 of Attachment 4 (2026 Siting Study) to the Siting Application.

Q. Is this a typical transmission line route development process used in the industry?

A. Yes. This is a robust and proven process used successfully by public utilities and consultants for decades.

Q. Please summarize the guidelines and factors used to identify and evaluate the potential routes.

A. The Siting Team used a series of general siting guidelines and factors that represent accepted siting principles to direct the development, evaluation, and ultimate selection of the routes. These guidelines and factors also meet the expectations of the route evaluation and siting regulations provided in 52 Pa. Code §§ 57.71–57.76, which outline the procedure

for locating and constructing high voltage transmission lines; and 52 Pa. Code §§ 69.3101–69.3107, which supplement the existing regulations by providing additional guidelines on public notice, environmental impact analysis, and safety. The following guidelines and factors were used to identify and evaluate routes:

- Consider parallel alignments along existing utility rights-of-way or other infrastructure, such as roadways and railroads.
- Maximize the distance from residential dwellings, schools, daycare facilities, hospitals, and other community facilities.
- Consider stakeholder input.
- Minimize visibility from federal and state listed scenic roadways and designated scenic resources.
- Minimize conflict with designated public resource lands, recreation lands, nature preserves, or other conservation areas.
- Minimize conflict with existing and approved future development and land uses.
- Minimize potential environmental and land use impacts by avoiding circuitous routes.
- Minimize new crossings of large wetland complexes, critical habitat, and other unique or distinct natural resources.
- Minimize habitat fragmentation and impacts on designated areas of biodiversity concern.
- Avoid crossing hazardous waste sites or sites with active mineral extraction activities.
- One of the Alternative Routes should be less than 20% coincident with the Proposed Route.

Using these established routing guidelines, the Siting Team identified opportunity and constraint features within the Study Area that would take advantage of existing corridors to the extent practicable and minimize potential impacts to the natural and human (or built)

environment. Details of the opportunity and constraints used to develop Study Segments are included in Section 3.3 of Attachment 4 to the Siting Application.

Q. Please describe how the Proposed Route was selected.

A. Once the feasible Alternative Routes were identified, the Siting Team undertook a quantitative and qualitative analysis of potential impacts of each Alternative Route to the human/built environment, the natural environment and engineering considerations. The Alternative Routes were reviewed in detail and compared using a combination of information collected in the field, GIS data sources, public and regulatory input, resource documents referenced in the Siting Study, engineering considerations, and the collective knowledge and experience of the Siting Team.

The goal of the quantitative and qualitative analysis is to select a suitable route for the 9A West Project that considers stakeholder input to extent practicable and minimizes the overall impacts on land use and natural and cultural resources while avoiding circuitous routes, extreme costs, and non-standard design requirements. However, in practice, it is not usually possible to avoid or minimize all potential impacts. There are often inherent tradeoffs in potential impacts to every siting decision. For example, in heavily forested study areas, the route that avoids the most developed areas will likely have the greatest amount of forest clearing, while the route that has the least impact on vegetation and wildlife habitats often impacts more residences or farmland. Thus, an underlying goal of comparative analysis is to reach a reasonable balance between minimizing potential impacts on one resource versus increasing the potential impacts on another.

Using the quantitative and qualitative analysis described above, the Siting Team selected a Proposed Route that, on balance, best minimizes the overall impacts for the 9A

West Project. The rationale for selecting the Proposed Route is derived from the accumulation of the siting decisions made throughout the process, the knowledge and experience of the Siting Team, comments from landowners and other members of the public and regulatory agencies, field reviews, and the comparative analysis of potential impacts of each Alternative Route.

A detailed description of the process used to select the Proposed Route for the 9A West Project is provided in Section 3.0 of Attachment 4 to the Siting Application.

Q. Was public outreach part of the route selection process?

A. Yes. As described above, stakeholder input, including public outreach ,was an integral part of the route development and selection process.

Q. Please summarize the 9A West Project's public outreach.

A. Transource PA conducted extensive outreach with the public throughout the siting process. Open houses for the 9A West Project were conducted on March 16 and March 17, 2026. These events were noticed in the local papers and property owners within a 1,000-foot wide corridor along the three alternative routes were sent notification letters via mail informing them of these open houses. The first open house was held at a public venue in Greencastle, PA with the second open house being held in Hagerstown, MD. These open houses followed an open format where the public could attend at any time during the scheduled hours for each open house. Attendees were given comment cards and were encouraged to identify the location of their residences, places of business, property of concern, or other sensitive resources on the printed maps. Handwritten comments from the attendees were digitized and entered into a database with the unique identifier so the comment and the

parcel could easily be correlated. A description of the public open houses held for the 9A West Project is also provided in Section 2.5 of Attachment 4 to the Siting Application.

As a result of the March 2026 open house events, and notification efforts completed to date via landowner letters and newspaper notices, the 9A West Project has received a total of 84 new comments. These comments were received from either the open house event, mailed in comments, or comments left via the Project website.

A more recent website was established for the 9A West Project that can be found currently at Rice - Ringgold Transmission Line Project. This website contains the current project description, virtual open house materials, a mapper tool with the updated routes, and the ability to leave an online comment. A description of the 9A West Project website is provided in Section 2.5.2 of Attachment 4 to the Siting Application.

Previously in 2017, Transource PA conducted two rounds of public open houses during different phases of the siting process to inform the public about the IEC Project and to obtain information from landowners about their properties. The first round of IEC Project open houses was held June 12-15, 2017, and focused on a wide network of Study Segments with the goal of obtaining information from the public to help modify, eliminate or add Study Segments. Following the first round of open houses and subsequent qualitative and quantitative analysis, the second round of IEC Project open houses was held August 7-8, 2017, and focused on a refined set of Study Segments. A description of the public open houses held for the IEC Project is provided in Section 2.5 of Attachment 4 to the Siting Application.

In addition to the open houses, Transource PA established an IEC Project website that was updated throughout the various phases of the siting process for that earlier project.

The website provided access to maps. Through the website, members of the general public could submit comments about the IEC Project or add points to the map to provide specific information about resources or structures on their property. The IEC Project website also offered the public the ability to virtually review the printed materials presented at the open houses such as the explanatory boards and the large format Project maps. Transource PA monitored the comments provided through the website and provided answers to questions from the public. A description of the IEC Project website is provided in Section 2.5.2 of Attachment 4 to the Siting Application.

Q Did Transource PA meet with other stakeholders?

A. Yes, Transource PA met with local governmental officials, consulted with state agencies, and met with local school representatives concerning routes. Please see Attachment 13 for a comprehensive list of these engagements.

Q Were other route options presented by local stakeholders?

A Yes, several stakeholders within Franklin County and State Representatives requested consideration of options to parallel Interstate 81 or extend through sections of Michaux State Forest.

Q Was a route paralleling Interstate 81 considered?

A. Yes – the Interstate 81 corridor was considered and reviewed for opportunities during the 2018 Siting Study and again in 2026. During the 2026 Siting Study reassessment, governmental officials in the greater Chambersburg area requested that the Interstate 81 corridor that extends along the eastern side of Chambersburg be evaluated for potential paralleling opportunities. The Study Segment Development section (Section 3.5.3) of the

Siting Study report details the larger linear opportunities that were reviewed during the initial siting process, where effort was completed to review Interstate 81 as an opportunity for paralleling existing linear infrastructure. However, ultimately few segments were developed paralleling Interstate 81 for several reasons:

- To reach Interstate 81 from the Ringgold Substation and to even develop parallel opportunities would require the route to traverse across the landscape in a westerly direction. This is not in the direction that the route needs to go to reach the Rice Substation located to the north and would add approximately 4-miles more length compared to the other Route Alternatives before it reaches Interstate 81.
- These four miles represent additional property owner easements; stream and wetland crossings; additional structures on farmland; as well as further costs. It is quite reasonable to assume that both these additional property owners and the PaPUC might question why the Siting Team would take such a circuitous route since it deviates from reasonable and good siting principles.
- Even if the route reached the Interstate 81 corridor, it cannot parallel the highway the whole length because there is significant residential, retail, and commercial development along the corridor that would need to be routed around. Effectively, every time the route reaches an obstruction along the highway, the Siting Team would need to develop a strategy for diverting around it,adding yet more mileage and associated impacts.

While the Interstate 81 corridor was considered, the Siting team reasonably concluded that using that corridor would result in more impacts on the surrounding population than either the Alternative Routes or the Proposed Route, and would shift the

concerns to different and more property owners. Note that route options parallelling Interstate 81 near Chambersburg and points north to the Rice Substation were identified and that sections of the Proposed Route are in fact located along this highway corridor.

Q. Were other Route options surrounding the I-81 Corridor re-assessed in 2026?

A. Yes. During the Siting Study update in 2026 the original Alternative Route A alignment required realignment due to new residential development that occurred after the original Siting Study was conducted. As a consequence of this new residential development, a possible Route realignment was developed that paralleled additional portions of I-81. This potential modification to Route A was identified and would have extended along an approximate 2.9-mile section of the highway, including a new crossing of U.S. Route 30. Most of this alignment took advantage of open lands that border the highway, but the remaining portions involved the route being near several commercial buildings, needing to cross back and forth over the highway to avoid residentially constrained areas, and having to traverse a 0.3 mile part of the Chambersburg Area Middle School property. Despite the complexity of the route, it was considered a potentially viable revision to the previous Alternative Route A and was moved forward for further evaluation and presented to the public during the open house events conducted in March 2026. Further coordination with government officials in March and April 2026, however, revealed that plans to rebuild the middle school closer to the highway could result in significant additional constraints to the route. Review of the proposed school plans concluded the Proposed Route would be too close to the proposed school buildings for reasonable development. Because of these engineering constraints, this potential re-route to Alternative Route A was removed from further review. Following these updates, another revised Alternative Route A was

developed to connect to Alternative Routes B and C through this area and is the route option discussed in the Siting Study. The Siting Study further details the Alternative Route A iterations and maturation in this area and provides an overview figure detailing the changes that have occurred along this route from 2017 to 2026.

Q. Was a route to the east crossing the South Mountain/Michaux State Forest area considered to avoid residential areas?

A. Yes. Segments through the South Mountain/Michaux State Forest area were also reviewed and considered in the Study Segment Development (Section 3.5.3) portion of the 2018 Siting Study, but excluded from further evaluation once full routes were developed. In 2026, local governmental officials asked Transource PA to again review this area in an effort to avoid residential areas. However, the Siting Team reconfirmed that routes crossing the South Mountain/Michaux State Forest were unreasonable for the following reasons:

- The siting review noted that there are no reasonable opportunities to parallel existing infrastructure that extend through the South Mountain/Michaux State Forest area that flows in the north – south direction required for the route. It was further noted that any route through the South Mountain/Michaux State Forest would be longer in length and the amount of environmental impacts to threatened and endangered species, streams, and wetlands would be significantly greater than other identified alternative routes. Pennsylvania environmental regulations require that reasonable alternatives must be considered to show that a proposed route with wetland and waterway impacts is the least impactful alternative. Any route proposed through the South Mountain/Michaux State Forest could not reasonably meet this burden, resulting in a high risk that Transource PA would be denied the necessary permits to construct the 9A West Project.

- During the 2018 routing study, segments that crossed through the western portion of South Mountain/State Forest were considered. Segments that might cut further through the heart of the forest were dismissed as any segments in this area would not be reasonably considered by the Department of Conservation and Natural Resources ("DCNR"), which manages Michaux State Forest, due to the extensive impacts and forest fragmentation. Western edge segments were developed, however. Some additional details are included in the Siting Study.
- A meeting was held with DCNR to discuss opportunities for developing routes through the State Forest lands; solicit their feedback around potential impacts with their preference to have the route avoid this last vestige of forested habitat within this larger geographical area due to the extensive environmental impacts; and to further review the State Forest Environmental Review process.
- After segment analysis was conducted, it was clear that any route through the South Mountain/Michaux State Forest area would result in extensive impacts to the natural environment including:
    - South Mountain/Michaux State Forest has some of the largest remaining habitat in the broader area for numerous threatened and endangered species (see the Siting Study that illustrates the Natural Areas, including two DCNR classified Natural Areas).
    - For the Mt. Cydonia Ponds Natural Area – large area of vernal ponds – any route not crossing the ponds themselves would cross adjacent areas to ponds that contain the same unique functions and rare species.

- For the Meeting of Pines Natural Area – an area of unique mixture of five pine species – any new line would bisect this natural area.
- PA Natural Heritage Program also notes two ecological natural areas that are coexistent with the two DCNR Natural Areas listed above – both areas contain species of special concern (plants, amphibians, reptiles, birds).

- This area of Michaux State Forest is also part of the South Mountain Important Bird Area ("IBA").
- The level of impacts to head waters and other streams in the forest would be extensive and would involve crossing a significantly larger number of streams through the state forest when compared to the proposed and alternative routes, and the resulting riparian impacts would be extensive. Note as well that these streams, such as Red Run, are high-quality value streams requiring elevated protection from PaDEP.
- Wetland impacts would be much more significant through these areas. Prime wetland areas are typically located along riparian corridors and within threatened and endangered habitat areas. For example, there is a large palustrine forested ("PFO") wetland bordering the high quality Red Run stream.
- Red Run is also a Pennsylvania Fish and Boat Commission classified Wild Trout Stream which means wetlands are considered Exceptional Value ("EV") including the PFO wetland noted above.
- The permanent wetland impacts including conversion of forested wetland would need to be mitigated likely with replacement through options such as offsite creation or mitigation credit purchase at 2:1 to 3:1 ratios, of the final resulting permanent impact acreage.

- Any route through this area, in addition to forested wetland impacts, would also require extensive upland forest impacts and result in substantial forest and habitat fragmentation.
- A route through this area could extend for approximately 5 miles through state forest lands and account for close to 80 acres of forest clearing. The forest is considered habitat for several species of state or federally protected bats.
- From a permitting perspective, Chapter 105 (Wetland and Waterway) regulations of the Pennsylvania Department of Environmental Protection ("PaDEP") requires that for any permanent wetland impacts, evidence must be provided showing there is no less impactful and reasonable alternative route that would reduce total wetland and environmental impacts. Without such evidence, PaDEP has the right to deny a permit approval. Given that there is an opportunity to traverse open land in upland areas that is less environmentally impactful, the Siting Team concluded that it seems unlikely that any less impactful route through South Mountain/Michaux State Forest could be shown or developed.
- Under Chapter 102 (National Pollutant Discharge Elimination System ("NPDES")) regulations, the route will also need to show evidence of limiting impacts to riparian corridors and as noted above, any route through South Mountain/Michaux State Forest would only increase the amount of riparian impacts.
- DCNR has an extensive process for ROW licensing on their property involving a State Forest Environmental Review ("SFER"). Like the Chapter 105 and 102 regulations, the SFER requires the proponent to show that no reasonable and less impactful alternative could be reasonably developed.

- Additionally, the SFER is a seven-step extensive process that would potentially add significant schedule impacts to the 9A West Project.
- Options to parallel existing infrastructure were evaluated, but existing infrastructure running through the South Mountain/Michaux State Forest land traverse west - east and are not in the direction of the proposed transmission line. Any new corridors running north to south would only further fragment the forest.
- The Proposed Route parallels the largest amount of existing transmission infrastructure through large open areas of the Study Area and is therefore very much aligned with PaPUC and PaDEP expectations.
- The landscape of the South Mountain makes constructability of the 9A West Project more challenging than development through open farmland (e.g., more access roads, larger crane pads, additional forest clearing, and steep slopes with landslide risks).
- Even with western segment routes through the forest area, there are still homes and development located along the western edge of the forest that would be impacted.

Q. Did Transource PA consider local comprehensive plans and zoning ordinances in selecting the Proposed Route for the 9A West Project?

A. Yes. Preliminarily, I note that I have been advised by legal counsel for Transource PA that public utility facilities, such as transmission lines and the non-building related components and structures of electric substations, are generally exempt from local land use and zoning regulations and authority. However, as required by the Commission's interim siting guidelines found at 52 Pa. Code, §69.1101 (2)(3) and §69.3104 (1), local zoning ordinances and comprehensive land use plans were reviewed by Transource PA to evaluate the impact of the Proposed Route on these local ordinances and plans. Transource PA evaluated the

Proposed Route's consistency with the zoning ordinances and comprehensive plans of the government entities through which the Proposed Route would pass. Transource PA has also reviewed the 9A West Project with representatives of Franklin County, Southampton Township, Greene Township, Guilford Township, Quincy Township, and Washington Township Planning Commissions as detailed within Attachment 13. A discussion of Transource PA's review of the local zoning ordinances and land use comprehensive plans is provided in Section 5.2.8 of Attachment 4 to the Siting Application.

III. PROPOSED ROUTE

Q. Please describe the feasible Alternative Routes identified by the Siting Team for the 9A West Project.

A. Using the siting process described above, the Siting Team identified three (3) Alternative Routes for the 9A West Project that were carried forward for further analysis to determine a Proposed Route. These three Alternative Routes are illustrated in Figure 7 of Attachment 4. Attachment 4 Siting Study (Section 3.5.5) details those changes that have occurred to the respective Alternative Routes from the 2018 Siting Study to the 2026 Siting Study with their final alignment descriptions described in detail below. The adjustments were developed to account for residential or commercial developments that have taken place during this time frame; or to address specific planned development relayed to the Siting Team during stakeholder engagement.

Alternative Route A (30.1 miles – of which 23.5 miles is in PA; less than 20% coincident with Proposed Route**)**

- Alternative Route A exits the Rice Substation and turns west for 1.3 miles traveling across agricultural fields and through a small, forested area. Rice Road is spanned halfway along this section.

- Turning sharply to the south and southwest, the route extends for 1.3 miles across more agricultural fields and other small, forested area before reaching Mickey Inn Road, which is bordered at the crossing location by a few residential parcels. Black Gap Road (State Route ("SR") 997) is also spanned in this section.

- Continuing to the south and southwest, the route extends across a mix of agricultural and forested lands for 1.6 miles to another crossing of the active Norfolk Southern rail line. Conococheague Creek, which is designated by the PaDEP as a Cold Water Fishes ("CWF")[2] stream, is spanned in this section. A dense residential community along Sycamore Grove Road will be bordered by the route, which starts to parallel the FE Letterkenny-Grand Point 138 kV line that extends through this community. This section also crosses a portion of the Eastern Greene Township Rural Historic District that borders both sides of a Norfolk Southern rail line.

- Crossing to the south side of the railroad line, the route extends 0.9 miles southeast across agricultural lands to I-81, with portions still paralleling the FE Letterkenny-Grand Point 138 kV line. A large farm and several residential parcels located along Grande Point Road are passed in this area which are within the Eastern Greene Township Rural Historic District.

- At this point, the route crosses to the east side I-81 and parallels the FE Letterkenny-Grand Point 138 kV line to the southeast for 0.8 miles, crossing Walker Road, to the Grand Point Substation, where the route turns sharply to the south for 1.0 miles to U.S. Route 30. The Lost Acres Airport is located approximately 0.6 mile west of the route.

- Prior to crossing commercial lined U.S. Route 30, the route first crosses over to the west side of the transmission line, which is now the FE Grand Point-Allegheny Energy 138 kV line, and then spans the highway. The route turns sharply west and then south for 0.5 miles to bypass around a commercial building. After going around the building, the route again parallels the FE Grand Point-Allegheny Energy 138 kV line for 0.3 mile.

- Alternative Route A deviates from the transmission line corridor to bypass around homes present along the line. Along this section, the route extends for 0.7 miles to the southwest and spans Falling Spring Branch (HQ-CWF), crosses Falling Spring Road, and traverses through a forested area that contains several homes. Within the forest, the route turns south, travels across an agricultural field and spans the FE Grand Point-Allegheny Energy 138 kV line near Henry Lane.

[2] The PaDEP develops water quality standards for all surface waters of the Commonwealth. These standards, which are designed to safeguard Pennsylvania's streams, rivers and lakes, consist of both use designations and the criteria necessary to protect those uses. https://www.pa.gov/agencies/dep/programs-and-services/water/clean-water/water-quality/stream-redesignations The designation "HQ" stands for High Quality Waters, while "CWF" stands for Cold Water Fishes.

- After crossing this road, the route travels for 1.4 miles to the southwest across agricultural fields before crossing Cider Press Road and turning south toward Wayne Road (SR 316).

- After crossing SR 316, the route extends for 2.0 miles crossing open fields, spanning the CSX Lurgan Division railroad line, paralleling and crossing Stone Quarry Road, crossing New Franklin Road, and spanning the FE Fayetteville-Allegheny Energy 115 kV transmission line, before turning sharply west to intersect with Helman Road.

- From Helman Road, Alternative Route A crosses open farm lands for 1.7 miles to the southwest before turning sharply to the southeast to cross Swamp Fox Road (SR 914).

- After crossing SR 914, the route traverses approximately 5.3 miles to the southeast through existing agricultural fields, making turns to avoid structures and spanning several local roads, until it reaches the west side of the active CSX Lurgan Division railroad line.

- Alternative Route A parallels the west side of the CSX railroad tracks for approximately 0.9 mile to the Buchanan Trail East (SR 16) crossing, where the route crosses the commercial-lined road and the railroad tracks to continue paralleling the east side of the tracks for approximately 2.4 miles. The route crosses one unnamed WWF stream in this section as well as crossing Barr Road and McDowell Road.

- The route turns sharply to the southeast for approximately 1.4 miles across predominantly agricultural fields toward Leitersburg Road (SR 2002), crossing Marsh Run (WWF) and the FE Reid-West Waynesboro 69 kV transmission line along the alignment.

- After crossing SR 2002, the route spans the Pennsylvania/Maryland state line and turns for 1.0 mile to the southeast to parallel Leiters Mill Road (was Leitersburg Road in Pennsylvania) until it reaches Millers Church Road, where the route turns sharply east, crossing both roads.

- The route continues east and southeast for 1.8 miles through agricultural fields, crossing an unnamed tributary to Antietam Creek, Antietam Creek, and then paralleling Battletown Road before intersecting with Leitersburg Pike (Maryland (MD) 60).

- After spanning MD 60, Alternative Route A extends 1.5 miles across agricultural lands to Poplar Grove Road, spanning Ringgold Pike (MD 418) and three unnamed tributaries to Little Antietam Creek.

- Turning east, the route extends for 0.6 mile over agricultural lands to intersect with the Ringgold-West Waynesboro 138 kV transmission line, which it parallels to the southwest for 0.4 mile. This section spans Newcomer Road and Gardenhour Road, crosses Little Antietam Creek and two tributaries, and extends through an orchard.

- Extending out for 0.5 mile to the southwest from the transmission line, Alternative Route A bypasses around residential structures along Rowe Road and traverses agricultural lands before spanning over to the south side of the FE Reid-Ringgold 138 kV transmission line.

- The route turns east for 0.8 mile and extends into the southeastern corner of the Ringgold Substation, spanning the FE Ringgold-East Hagerstown 138 kV transmission line four times and Smithsburg Pike (MD 64) along the alignment.

Alternative Route B (31.0 miles – of which 24.4 miles is in PA)

- Alternative Route B exits the Rice Substation from the southeast corner and spans 0.2 miles east over the active Norfolk Southern railroad and to the east side of I-81, where it turns to the south to parallel I-81 for 1.1 miles to SR 696. Along this stretch the route crosses Pine Stump Road, Mountain Run (CWF), and is within 0.5 miles of the Rocktop Airport that is located to the east past SR 696.

- The route turns sharply east to cross SR 696 perpendicularly and travels approximately 0.6 mile to the east-southeast through an agricultural field before turning sharply to the southwest.

- Travelling southwest for 0.7 mile, the route crosses Phillaman Run (CWF) and then crosses Black Gap Road (SR 997) in a perpendicular fashion. Alternative Route B follows the outer edge of the parking lot for the Chambersburg Mall for 0.6 mile on the eastern and northern sides of the mall and then heads west to intersect with I-81 again.

- After reaching the eastern side of I-81, Alternative Route B turns sharply south, and parallels the interstate for approximately 1.4 miles; at this location I-81 and the route generally travel in a western direction. Along this section, Alternative Route B traverses the edge of agricultural fields and crosses an unnamed stream (CWF) and the Conococheague Creek (CWF) stream.

- Alternative Route B turns sharply to the southwest and travels 0.4 until it reaches the existing FE Letterkenny-Grand Point 138 kV transmission line. The route stays to the east of this system and parallels it south for approximately 1.6 miles toward U.S. Route 30, spanning along agricultural fields, around the Grand Point Substation, and over Walker Road. The Lost Acres Airport is located approximately 0.6 mile west of the route.

- Prior to crossing U.S. Route 30 which is lined with commercial businesses, the route first crosses over to the west side of the transmission line, which is now the FE Grand Point-Allegheny Energy 138 kV line, and then spans the highway. The route turns sharply west and then south for 0.5 miles to bypass around the commercial building. After going around the building, the route again parallels the FE Grand Point-Allegheny Energy 138 kV line for 0.5 mile.

- Alternative Route B deviates from the transmission line corridor for 1.1 mile to bypass around homes along the line. Along this section, the route extends to the southwest and spans Falling Spring Branch (HQ-CWF), crosses Falling Spring Road, and traverses through a forested area that contains several homes. Within the forest, the route turns south, travels across an agricultural field and spans the FE Grand Point-Allegheny Energy 138 kV line near Henry Lane.

- After crossing this road, Alternative Route B extends to the southeast for approximately 4.6 miles over agricultural fields to Yohe Road, where it intersects with the FE Fayetteville-West Waynesboro 138 kV transmission line. This section involves crossing of two unnamed WWF streams, one CWF stream, several local roadways, and the FE Fayetteville-Allegheny 69 kV line.

- As the route crosses Yohe Road, it also spans to the east side of the FE Fayetteville-West Waynesboro 138 kV transmission line and then turns sharply to the south to parallel this existing line for approximately 1.0 mile; an unnamed CWF stream is crossed in this section, as is Stamey Hill Road.

- At this point, Alternative Route B turns sharply to the west and spans to the west side of the FE Fayetteville-West Waynesboro 138 kV transmission line and travels for approximately 1.0 mile across agricultural fields, Buttermilk Road, and one CWF stream and intersects with the CSX Lurgan Division railroad corridor.

- The route turns to the southwest and parallels the CSX railroad for approximately 4.5 miles, with some deviations to bypass around residential and agricultural facilities adjacent to the railroad line. This stretch crosses Wayne Highway (SR 316), several local roads, and three unnamed CWF streams.

- At this point, Alternative Route B crosses to the west side of the CSX rail line and parallels the west side of the CSX railroad tracks for approximately 0.9 mile to the Buchanan Trail East (SR 16) crossing, where the route crosses the commercial building-lined road and the railroad tracks to continue paralleling the east side of the tracks for approximately 2.4 miles. The route crosses one unnamed WWF stream in this section as well as crossing Barr Road and McDowell Road.

- The route turns sharply to the southeast for approximately 1.3 miles across predominantly agricultural fields toward Leitersburg Road (SR 2002), crossing Marsh Run (WWF) and the FE Reid-West Waynesboro 69 kV transmission line along the alignment.

- After crossing SR 2002, Alternative Route B spans the Pennsylvania/Maryland state line and turns for 1.0 mile to the southeast to parallel Leiters Mill Road (was Leitersburg Road in Pennsylvania) until it reaches Millers Church Road, where the route turns sharply east, crossing both roads.

- The route continues east and southeast for 1.8 miles through agricultural fields, crossing an unnamed tributary to Antietam Creek and Antietam Creek, and paralleling Battletown Road before intersecting with Leitersburg Pike (Maryland (MD) 60).

- After spanning MD 60, Alternative Route B extends 1.5 miles across agricultural lands to Poplar Grove Road, spanning Ringgold Pike (MD 418) and three unnamed tributaries to Little Antietam Creek.

- Turning east, the route extends for 0.6 mile over agricultural lands to intersect with the Ringgold-West Waynesboro 138 kV transmission line, which it parallels to the southwest

for 0.4 mile. This section spans Newcomer Road and Gardenhour Road, crosses Little Antietam Creek and two tributaries, and extends through an orchard.

- Extending out for 0.5 mile to the southwest from the transmission line, Alternative Route B bypasses around residential structures along Rowe Road and traverses agricultural lands before spanning over to the south side of the FE Reid-Ringgold 138 kV transmission line.

- The route turns east for 0.8 mile and extends into the southeastern corner of the Ringgold Substation, spanning the FE Ringgold-East Hagerstown 138 kV transmission line and Smithsburg Pike (MD 64) along the alignment.

Alternative Route C (27.9 miles – of which 23.5 miles is in PA)

- Alternative Route C exits the Rice Substation from the southeast corner and spans 0.2 miles east over the active Norfolk Southern railroad and to the east side of I-81, where it turns to the south to parallel I-81 for 1.1 miles to SR 696. Along this stretch the route crosses Pine Stump Road, Mountain Run (CWF), and is within 0.5 miles of the Rocktop Airport that is located to the east past SR 696.

- Alternative Route C turns sharply east to cross SR 696 perpendicularly and travels approximately 0.6 mile to the east-southeast through an agricultural field before turning sharply to the southwest.

- Travelling southwest for 0.7 mile, Alternative Route C crosses Phillaman Run (CWF) and then crosses Black Gap Road (SR 997) in a perpendicular fashion. Alternative Route C traverses for 0.6 mile around the perimeter of the Chambersburg Mall, generally following the outer edge of the parking lot on the northern and eastern sides of the mall, and then heading west to parallel with I-81 again.

- After reaching the eastern side of I-81, Alternative Route C turns sharply south and parallels the interstate for approximately 1.4 miles and at this location I-81 and the route generally travel in a western direction. Along this section, Alternative Route C traverses the edge of agricultural fields and crosses an unnamed stream (CWF) and the Conococheague Creek (CWF).

- Alternative Route C turns sharply to the southwest and travels 0.4 miles until it reaches the existing FE Letterkenny-Grand Point 138 kV transmission line. The route stays to the east of this system and parallels it south for approximately 1.6 miles toward U.S. Route 30, spanning along agricultural fields, around the Grand Point Substation, and over Walker Road. The Lost Acres Airport is located approximately 0.6 miles west of the route.

- Prior to crossing commercial building-lined U.S. Route 30, Alternative Route C first crosses over to the west side of the transmission line, which is now the FE Grand Point-Allegheny Energy 138 kV line and then spans the highway. The route turns sharply west and then south for 0.5 miles spanning across a parking lot and bypassing around a commercial building. After going around the building, the route again parallels the FE Grand Point-Allegheny Energy 138 kV line for 0.5 mile.

- Alternative Route C deviates from the transmission line corridor for 1.1 mile to bypass around homes along the line. Along this section, the route extends to the southwest and spans Falling Spring Branch (HQ-CWF) stream, crosses Falling Spring Road, and traverses through a forested area where homes are present to the east. Within the forest, the route turns south, travels across an agricultural field and spans the FE Grand Point-Allegheny Energy 138 kV line near Henry Lane.

- After crossing this road, Alternative Route C extends to the southeast for approximately 4.6 miles over agricultural fields to Yohe Road, where it intersects with the FE Fayetteville-West Waynesboro 138 kV transmission line. This section involves crossing two unnamed WWF streams, one CWF stream, several local roadways, and the FE Fayetteville-Allegheny 69 kV line.

- As Alternative Route C crosses Yohe Road, it also spans to the east side of the FE Fayetteville-West Waynesboro 138 kV transmission line and then turns sharply to the south to parallel this existing line for approximately 1.7 miles; an unnamed CWF stream is crossed in this section, as is Stamey Hill Road.

- A 0.6 mile deviation from the colocation is required in the vicinity of the Manheim Road crossing due residential development that has built up adjacent to the transmission line, and the route then parallels the existing line for 0.5 miles on the eastern side.

- At Hess Benedict Road, Alternative Route C crosses over to the west side of the FE Fayetteville-West Waynesboro 138 kV transmission line to avoid agricultural and residential structures. The route parallels the line for another 3.7 miles, traversing agricultural fields, crossing Orphanage Road, Wayne Highway (SR 316), and Buchanan Trail East (SR 16), as well as an unnamed CWF stream.

- After crossing SR 16 and spanning the FE Antrim-West Waynesboro 69 kV lines, Alternative Route C turns sharply to the west and parallels this line for approximately 0.4 miles. This stretch includes a crossing of Cold Springs Road and an unnamed CWF stream.

- Turning to the south and then east, Alternative Route C extends for 1.2 miles to Marsh Road. The route traverses an agricultural field to avoid agricultural and residential structures, and crosses an unnamed CWF stream, the FE Reid-West Waynesboro 69 kV line, and the FE Ringgold-West Waynesboro 138 kV line.

- After crossing Marsh Road and an unnamed CWF stream, Alternative Route C turns sharply south to parallel the east side of the FE Ringgold-West Waynesboro 138 kV line for 2.1 miles. Alternative Route C crosses agricultural fields, Hagerstown Road (SR 316), the FE West Waynesboro-East Waynesboro 138 kV line, and the West Branch Antietam Creek (CWF) along this stretch. The route extends away from the transmission line corridor to avoid residential structures near the southern end of this section prior to crossing Lyons Road.

- Spanning to the west side of the FE Ringgold-West Waynesboro 138 kV line, Alternative Route C turns south and crosses the Pennsylvania/Maryland state line. The route generally

parallels the transmission line for approximately 2.6 miles until it intersects with Gardenhour Road. Some deviations are required along this stretch to avoid agricultural operations and structures. The route in this section crosses Rocky Forge Road, Ringgold Pike (SR 418), Poplar Grove Road, and Newcomer Road, as well as numerous crossings of various tributaries to Little Antietam Creek.

- Alternative Route C crosses Gardenhour Road paralleling the existing transmission line for 0.4 miles and traverses through an orchard.

- Alternative Route C extends out for 0.6 miles to the southwest from the transmission line to bypasses around residential structures along Rowe Road and traverses agricultural lands before spanning over to the south side of the FE Reid-Ringgold 138 kV transmission line.

- Alternative Route C turns east for 0.7 miles and extends into the southeastern corner of the Ringgold Substation, spanning the FE Ringgold-East Hagerstown 138 kV transmission line and Smithsburg Pike (MD 64) along the alignment.

Q. What route was selected as the Proposed Route for the 9A West Project?

A. Based on an updated qualitative and quantitative review of information obtained from GIS data, field reconnaissance, agency consultation and updated public outreach as well as engineering considerations for the 9A West Project, the Siting Team selected Alternative Route C as the Proposed Route.

Q. Please explain why Alternative Route C was selected as the Proposed Route.

A. The Proposed Route has an approximate length of 27.9 miles (approximately 23.5 miles in Pennsylvania and approximately 4.4 miles in Maryland). Being a more direct alignment between the proposed Rice and Ringgold Substations it will cross the least number of parcels (129) and impacts the fewest landowners (102) compared to the other alternatives. The alignment avoids the more populated sections of the Study Area by crossing agricultural lands adjacent to Interstate 81 and paralleling an existing transmission line corridor south past Waynesboro as it extends into the Ringgold Substation. Additionally, the Proposed Route spans U.S. Route 30 in a commercial retail area thereby minimizing

the residentially dense areas along this corridor. As a result, the Proposed Route has the fewest residences within 500 feet (112) compared to the other alternatives.

Of the three routes, the Proposed Route crosses a similar amount of cropland compared with the other alternatives and has the least amount of pasture/rangeland crossed.

Environmentally, the Proposed Route would span a low number of streams (22) and have minimal impact on riparian areas. As noted previously, streams and floodplains will be crossed at right angles and spanned with structures typically placed outside these regulated areas. Since one of the streams crossed will be the HQ-CWF designated Falling Spring Branch waterway, the construction of this alignment will involve additional stormwater permitting requirements focused on the preservation of the water quality level. In terms of wetlands, this alignment would cumulatively cross the least wetland area relative to the other alternatives. Similar to streams and floodplains, wetland areas will be spanned to further minimize potential impact.

The Proposed Route has the least amount of tree clearing (39 acres) compared to the other options, which reduces the forest fragmentation effects and potential impacts to threatened and endangered species that use forest habitats, such as bat species. In terms of other potential threatened and endangered habitat areas, the Proposed Route would cross three natural areas in Pennsylvania and one Sensitive Species Project Review Area ("SSPRA") in Maryland, that are comprised predominantly of open meadows that can be spanned by the transmission lines therefore minimizing potential impacts on the plant or animal communities.

From an engineering perspective, the Proposed Route parallels existing linear features such as roads, railroads, and existing transmission lines, for 43% of the total length

of the transmission line, which may allow for the use of existing access roads for maintenance. Overall, the Proposed Route is the preferred route from an engineering and constructability perspective. In addition, the Proposed Route will not interfere with any airport operations or quarries. Although the Proposed Route crosses more existing electric transmission lines than some of the other routes considered, Transource PA will work with the incumbent utilities to ensure proper clearances in order to safely operate and maintain the facilities. Our updating of the information gathering and siting analysis demonstrates that Alternative Route C continues to be the optimal solution for Project 9A West.

A detailed explanation of the metrics driving the selection of Alternative Route C as the Proposed Route for the 9A West Project is provided in Attachment 4 to the Application.

Q. Please explain what consideration was given to agricultural land uses present along the Proposed Route?

A. This more direct route will help minimize impacts to agricultural lands, farming operations, and orchard areas since many of the alignments across these areas were identified and actively reviewed during early coordination with the landowners. Transmission lines and agricultural land uses are not incompatible land uses. Farming, animal husbandry, and plant husbandry can continue underneath the transmission lines for most crops, farm animals, and orchards. Many of the national standards for transmission line design are specifically in place to ensure that typical farm machinery can continue to operate in the vicinity of and under transmission lines.

The new structures for the Project were initially designed to consist of lattice towers, which are typically more flexible to adjust to the changing terrain. Coordination

with the landowners, especially those owning agricultural lands, however, concluded that a monopole design would result in less impact to the farmer in terms of a smaller area of inaccessible farmland and easier maneuverability with large farm equipment. As a consequence of this coordination and input, Transource modified the proposed structure design to use monopoles, thereby reducing the potential farming impact.

Other key requests during this coordination were to span fields or parallel property lines or access roads where feasible, and to provide specially engineered structures near orchards to allow the orchard trees to remain in production under the ROW. Transource PA worked with landowners to understand any immediate plans to expand farming operations that included buildings and worked to minimize impact where possible. Transource PA has also worked to minimize impacts through selective siting of pole locations and alignment with the goal of not impacting the ability to crop farm. Currently, the potential cumulative area that would be directly affected by pole placement, with an assumed 10-foot diameter, accounts for less than 0.5 acre across the approximate 28-mile alignment of the Proposed Route.

Q. What is the current status of easement acquisition for the Proposed Route?

A. Currently, of the 108 parcels crossed in Pennsylvania, ROW easements have been secured for 68 of the parcels (63%), and in Maryland, of the 21 parcels crossed, ROW easements have been secured for 18 of the parcels (86%).

IV. COMPLIANCE WITH POTENTIAL PERMIT AND MITIGATION REQUIREMENTS

Q. Please summarize Transource PA's efforts to minimize the anticipated impacts and potential permit and mitigation requirements of the Proposed Route for the 9A West Project.

A. Efforts were made during the siting process to minimize impacts on existing and future land uses, as well as avoid sensitive natural resources, such as wetlands and streams. Where potential impacts are unavoidable, best management practices will be employed, and Transource PA will obtain and comply with any necessary permits.

As part of the permitting process, any required waterway, wetland, or floodplain encroachment permits will be obtained from the applicable jurisdictional state and federal agencies prior to construction, and Transource PA will comply with all special conditions placed on the permits. In addition, to address water quality standards within watersheds along the 9A West Project corridor, Transource PA will comply with the regulations of the National Pollutant Discharge and Elimination System permit program, obtain the required soil erosion and sedimentation control permits, and follow the specified conditions required for the permit.

A detailed discussion of Transource PA's efforts to minimize the anticipated impacts and potential permit and mitigation requirements of the proposed 9A West Project is provided in Section 5.2 of Attachment 4 to the Siting Application, including potential impacts to land use; natural features; rare, threatened, and endangered species; cultural resources; community features and conserved lands; and agency requirements and permits. Additionally, Attachment 7 details the current status of any required environmental studies along with the associated permit applications.

Q. Does this conclude your testimony at this time?

A. Yes. However, I reserve the right to file such additional testimony as may be necessary or appropriate during the course of this proceeding.

VERIFICATION

I, Barry A. Baker, Vice-President – Environmental Planning & Permitting – Eastern U.S., AECOM Corporation, hereby state that the facts set forth above 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).

Date: May 21, 2026

By: Barry A. Baker
Barry A. Baker, Vice-President –
Environmental Planning & Permitting –
Eastern U.S.
AECOM

STATEMENT 5

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 County, Pennsylvania	:	Docket No. A-2026-_____

Transource Pennsylvania, LLC
9A West Project

Statement No. 5

Direct Testimony of
Jacob Clouse

Topics Addressed: **Design and Safety Features of the 9A West Project; Electric and Magnetic Fields Policy and Practices of Transource PA**

Dated: May 21, 2026

Q. Please state your name and business address.

A. My name is Jacob Clouse. My business address is Burns & McDonnell, 9400 Ward Parkway, Kansas City, MO 64114.

Q. By whom are you employed?

A. I am employed by Burns & McDonnell Engineering Company, Inc. ("BMcD") as a transmission line engineer.

Q. Please provide a summary of your education and professional work experience.

A. I earned a Bachelor of Science in Civil Engineering from the University of Missouri-Columbia. I have been employed by BMcD for over 13 years in the overhead transmission department.

Q. What are your responsibilities in connection with the 9A West Project ("9A West Project")?

A. I oversee the transmission line engineering services that BMcD is providing to Transource Pennsylvania, LLC ("Transource PA") on the 9A West Project.

Q. What is the purpose of your direct testimony in this proceeding?

A. First, I will explain the major design features of the transmission lines associated with the proposed new double-circuit Rice-Ringgold 230 kV Transmission Line. Second, I will explain the safety features incorporated into the design of the 9A West Project. Finally, I will address the Electric and Magnetic Fields Policy and Practices of Transource PA that will be utilized in the 9A West Project.

Q. Please describe the portions of the Siting Application that you are sponsoring.

A. I am sponsoring Attachment 5, the Engineering Description and Safety Practices, and Attachment 11, the Electric and Magnetic Fields Policy and Practices of Transource PA.

Q. Please provide an overview of the 9A West Project.

A. As explained in the written direct testimony of Timothy J. Horger (Transource PA Statement No. 3), PJM Interconnection L.L.C. ("PJM") identified a need to alleviate transmission congestion constraints in Pennsylvania, Maryland, West Virginia, and Virginia. To address these congestion constraints, PJM approved "Project 9A" as Baseline Upgrade Numbers b2743 and b2752. Project 9A West is a major component of Project 9A.[1]

The 9A West Project approved by PJM involves (i) construction of the Rice Substation and (ii) construction of a new overhead double-circuit 230 kV interstate transmission lines, the new Rice-Ringgold 230 kV Transmission Line.

Upon receipt of all necessary approvals for the Company's preferred route, the new Rice-The Ringgold 230 kV Transmission Line will extend approximately 29 miles, connecting the existing Ringgold Substation located near Smithsburg, Washington County, Maryland, and the new Rice Substation to be located in Franklin County, Pennsylvania.

[1] As noted by other witnesses, Transource PA's original attempt to obtain approval for the original 9A Project, also called the IEC Project (which included both 9A West and a related project called 9A East), was rejected by the PUC in an order entered May 24, 2021, at PUC Docket Nos. A-2017-2640195 (the 9A East Project) and A-2017-2640200 (the 9A West Project) (collectively, "IEC Proceeding"). After the Commission's denial of the authorizations requested by Transource PA in the IEC Proceeding, transmission projects approved by PJM in 2022 utilizing existing rights of way and the Chanceford 500 kV substation eliminated the need for the Transource PA Furnace Run 500 kV substation, rendering the 9A East Project no longer necessary. Also, after the Commission's rejection of the IEC Project in 2021, PJM placed the IEC Project into a suspended status. In 2025, PJM completed a restudy of the IEC Project, determined that the 9A West Project portion of the IEC Project was still needed, and that the cost/benefit ratio of the 9A West Project had increased.

This transmission line project is referred to as the 9A West Project and is the subject of this Siting Application.

As further explained by Eric S. Williams in Transource PA Statement No. 2, Transource PA is obligated and responsible for the construction, ownership, maintenance, and operation of the new Rice Substation in Pennsylvania and the Pennsylvania portion of the new interstate Rice-Ringgold 230 kV Transmission Line between Maryland and Pennsylvania. Transource PA's affiliate, Transource Maryland, LLC ("Transource MD"), is obligated and responsible for the construction, ownership, maintenance, and operation of the Maryland portion of the new interstate Rice-Ringgold 230 kV Transmission Line.

Q. What is the National Electrical Safety Code?

A. The National Electrical Safety Code ("NESC") is a set of rules designed to safeguard people during the installation, operation, and maintenance of electric power lines. The NESC contains the basic provisions considered necessary for the safety of employees and the public. Although it is not intended as a design specification, its provisions establish minimum design requirements.

Q. Will the Rice-Ringgold 230 kV Transmission Line for the 9A West Project comply with the NESC standards?

A. Yes.

Q. Please explain the safety features incorporated into the design of the Rice-Ringgold 230 kV Transmission Line associated with the 9A West Project.

A. For the Rice-Ringgold Transmission Line, Transource PA has developed design specifications and safety rules that meet or surpass all requirements specified by the NESC.

A detailed description of the project's design and safety specifications, and how they meet the NESC standards can be found in Attachment 5 to the Siting Application.

In addition to meeting the NESC standards, the Rice-Ringgold 230 kV Transmission Line will also be designed to meet the recommendations outlined in the American Society of Civil Engineers (ASCE) Manual 74 ("Guidelines for Electrical Transmission Line Structural Loading"). To facilitate safe operation of the transmission line, high speed line protection will be installed, de-energizing the line nearly instantaneously if there were to be an operational problem.

Pertaining to occupational safety for construction, maintenance, and related activities, Transource PA conducts evaluations of contractors that exceed those required by law. Transource PA conducts safety and health audits on potential contractors. During these audits, Transource PA not only looks for compliance with Federal, State, and Local regulations, but also assesses the overall safety and health culture of the contractor. Once the contractor has satisfactorily completed the audit, they are eligible to be awarded work that is within the scope of services provided by that contractor.

A description of the safety features incorporated into the design of the 230 kV transmission lines associated with the 9A West Project is provided in Attachment 5 to the Siting Application.

Q. Please describe the design of the Rice-Ringgold 230 kV Transmission Line associated with the 9A West Project?

A. The Rice-Ringgold 230 kV Transmission Line associated with the 9A West Project will be a 230 kV double-circuit transmission line. The 230 kV double-circuit design will utilize twelve power conductors (two in each of the six phase positions) and two overhead ground

wires. The power conductors will be 795 kcmil[2] 26/7 Aluminum Conductor Steel Supported ("ACSS") "Drake". The overhead ground wires will provide lightning protection and in some cases communication between circuit breakers that remove the line from service should a fault on the line be detected.

Q. Please describe the principal types of 230 kV structures that will be used for the Pennsylvania portion of the 9A West Project.

A. The Pennsylvania portion of the new Rice-Ringgold 230 kV Transmission Line will be sited to extend approximately 24.2 miles between the Maryland border and the new Rice Substation to be located in Franklin County, Pennsylvania. The Pennsylvania portion of the new 9A West Project will require the installation of approximately 155 structures with an average height of 130 feet. The spans between the structures will be approximately 800 feet.

The Pennsylvania portion of the new 9A West Project will consist of tubular steel monopole and multi-pole structures. Typical design diagrams similar to those that will be installed for the 9A West Project are included in Attachment 5.

Q. What is the current status of engineering work on the 9A West Project?

A. Ninety percent of the project engineering was completed by May 2021. Final design has now been completed and updated. The final design includes the transmission line, final structure design, final material design, and final foundation design. The final design does not include any lattice towers, which limits the permanent footprint of structures.

[2] A kcmil is a thousand circular mils. A circular mil is the cross-sectional area of a wire one mil in diameter, where 1 kcmil = 0.5067 mm^2.

Q. Please describe the Electric and Magnetic Fields Policy and Practices of Transource PA.

A. Attachment 11 of the Siting Application, the Electric and Magnetic Fields Policy and Practices of Transource PA, describes these Policies and Practices. Electric and Magnetic Fields ("EMF") are a common and unavoidable feature of modern life and are produced by many everyday sources, including household wiring and appliances, as well as electric transmission lines. Transource PA addresses EMF concerns through a combination of informational, technical and line siting strategies, including adherence to accepted industry standards and prudent engineering and siting practices as described in more detail in Attachment 11.

Q. Does this complete your direct testimony?

A. Yes, it does. However, I reserve the right to file such additional testimony as may be necessary or appropriate during the course of this proceeding.

VERIFICATION

I, Jacob Clouse, Transmission Line Engineer, Burns & McDonnell Engineering Company, Inc., hereby state that the facts set forth above 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).

Date: May 21, 2026

By: _____

Jacob Clouse, Transmission Line Engineer
Burns & McDonnell Engineering Company, Inc.

STATEMENT 6

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 County, Pennsylvania	:	Docket No. A-2026-_____

Transource Pennsylvania, LLC
9A West Project

Statement No. 6

Direct Testimony of
Michael Mechler

Topics Addressed: **Process used by Transource PA to acquire the Rights-of Way and Easements necessary for the 9A West Project; Transource PA's Policy Regarding the Landowner's Use of the Right-of-Way Area; Transource PA Vegetation Management Practices; Summary of the Status of Negotiations with Landowners.**

Dated: May 21, 2026

Q. Please state your name and business address.

A. Michael Mechler, 701 Cedar Lake Blvd., Ste 200, Oklahoma City, OK 73114

Q. By whom are you employed and in what capacity?

A. I am employed by Western Land Services Inc. ("WLS"), as Director of Right-of-Way and Infrastructure where I oversee the management and strategic direction of all Right-of-Way related activities for our project portfolios to ensure alignment with client organizational goals and efficient resource allocation.

Q. **What is your educational background?**

A. I graduated from Mount St. Joseph University with a Bachelors of Science – Business Administration degree and a Master's in Business Administration from Eastern University in Organizational Management.

Q. Are you a member of any professional organizations?

A. I am a Project Management Professional ("PMP") with the Project Management Institute ("PMI"). I am also a member of the International Right-of-Way Association ("IRWA").

Q. Please describe your employment history.

A. I worked as a Right-of-Way / Senior Right-of-Way agent with EnSite USA from February 2016 – September 2019. I was employed by Contract Land Staff as a Senior Right-of-Way agent from January 2020 – February 2020. From March 2020 – February 2025 I was employed by O.R. Colan holding the following positions throughout my tenure; Assistant Project Manager, Project Manager, Project Manager II, and Divisional Director. At WLS I am the Director of Right-of-Way and Infrastructure.

Q. What are your responsibilities in connection with the 9A West Project to be constructed and developed by Transource Pennsylvania LLC ("Transource PA")?

A. As the Director of Right-of-Way Infrastructure, I am responsible for overseeing and managing right-of-way ("ROW") projects for our clients. In addition, I am currently serving as the Project Manager / Right-of-Way Supervisor for the 9A West Project. WLS is contracted as the ROW service vendor through Transource PA and is providing all necessary ROW services for the successful acquisition of easement agreements from affected landowners for the 9A West Project.

Additionally, I am responsible for resource allocation for WLS to staff the 9A West Project in order to meet all ROW project deadlines. I collaborate with Transource PA and its affiliates to effectively allocate resources, including budget, personnel, and timelines, to support the successful execution of the 9A West Project.

Q. What is the purpose of your direct testimony in this proceeding?

A. The purpose of my direct testimony in this proceeding is to describe the ROW and land services activities performed by WLS on behalf of Transource PA for the 9A West Project in support of Transource PA's pending application with the Pennsylvania Public Utility Commission ("Commission" or "PaPUC") for authorization to site the transmission line and related facilities that comprise the 9A West Project ("Siting Application"). My testimony explains WLS' role as Transource PA's ROW service provider, including route-level property research, landowner outreach, acquisition of easements and related property rights, coordination with landowners and local stakeholders, and support of permitting and survey access activities.

In addition, my testimony establishes that WLS' ROW efforts have been conducted in a manner consistent with industry standards and applicable PaPUC standards and practices, with an emphasis on good-faith negotiations, respectful engagement with affected landowners, and minimizing impacts to private property. My testimony demonstrates and confirms that Transource PA has the ability, through WLS, to acquire the necessary property interests to construct, operate, and maintain the 9A West Project in a timely and responsible manner.

Q. Please provide an overview of the 9A West Project.

A. The 9A West Project approved by PJM involves the (i) construction of the Rice Substation and (ii) construction of the new Rice-Ringgold overheard double-circuit 230 kV Transmission Line.

Upon receipt of all necessary approvals the new Rice-Ringgold 230 kV Transmission Line will extend approximately 29 miles, connecting the existing Ringgold Substation located near Smithsburg, Washington County, Maryland, and the new Rice Substation to be located in Franklin County, Pennsylvania. As noted above, this transmission line project is referred to as the 9AWest Project.

Transource PA is responsible for the construction, ownership, maintenance, and operation of the new Rice Substation in Pennsylvania; and the Pennsylvania portion of the new interstate Rice-Ringgold 230 kV Transmission Line. Transource PA's affiliate, Transource Maryland, LLC ("Transource MD"), is responsible for the construction, ownership, maintenance, and operation of the Maryland portion of the new interstate Rice-Ringgold Transmission Line.

Q. Please describe the portions of the Siting Application that you are sponsoring.

A. I am responsible for Attachment 6, which provides a list of the owners of properties that will be traversed by the Rice-Ringgold Transmission Line associated with the 9A West Project. I also am responsible for Attachment 12, which describes Transource PA's plan for managing vegetation along the route for the 9A West Project and Attachment 14, which provides the information that Transource PA has sent to fully notify landowners from whom it has yet to secure necessary ROW that may be affected by the proposed 9A West Project.

Q. Please explain Transource PA's policy regarding dealings with landowners impacted by the 9A West Project.

A. WLS and Transource PA treat landowners with honesty and respect during the ROW acquisition process. Where the 9A West Project impacts private property and there is a need for an easement or access across private property, each property owner will be fairly compensated for any land rights needed by Transource PA. WLS, as the agent for Transource PA, will review the fair market value for the property and extend an offer for the land rights still needed for the 9A West Project consistent with Transource PA's guidance and direction. If damage occurs as part of the construction activities, Transource PA will work with each landowner to restore the property to the greatest extent possible and will offer compensation for any crop loss or damages, as appropriate.

Q. Did Transource PA provide information to landowners whose properties may be subject to a right-of-way or easement agreement?

A. Yes. There are two large categories of property owners impacted by the 9A West Project. The first group includes landowners with whom Transource PA previously negotiated the

land rights needed for the 9A West Project, as the Project was originally contemplated in 2016-2017. Most of these property rights were in the form of executed option agreements that Transource PA has been exercising over the last several months in preparation for meeting its obligation to construct and develop the 9A West Project. In exercising its rights under the existing option agreements, Transource PA has been contacting the relevant property owners – and sometimes their successors who are bound by the same option agreements - to advise them of the 9A West Project and of Transource PA's desire to exercise the existing options.

The second category of property owners are those with whom Transource PA has not yet finalized easement agreements for the 9A West Project. Prior to attempting to contact these landowners, Transource PA has provided and will continue to provide information to fully notify them that Transource PA plans to negotiate to acquire of ROW and easements. The information provided to landowners included the name of the proposed project, a brief description of the 9A West Project, and a description of their legal rights and Transource PA's legal rights regarding the 9A West Project. This information includes the two notices that are required by the Commission in its regulations at 52 Pa. Code § 57.91. The first notice references Transource PA's power of eminent domain, that is, the power to condemn land rights to construct facilities needed to provide electric utility services to the public. The second notice provides information related to the right-of-way maintenance practices for the 9A West Project. This information and notices are included in Attachment 14 to the Siting Application.

All landowners who have provided ROW to Transource PA, as well as landowners from whom ROW is still needed, will continue to receive information updating them on the status of the 9A West Project.

Q. For property owners from whom Transource PA has not yet obtained the necessary ROW for the 9A West Project, what does Transource PA do after providing the required PaPUC notices to landowners?

A. Pursuant to 52 Pa. Code § 57.91(a), Transource PA must wait at least fifteen (15) days after the landowner receives the notices provided in Attachment 14 to the Siting Application before commencing activities. Transource PA will then contact the property owner(s) via telephone or in person to request a convenient time to meet so that we may explain the details of the 9A West Project and answer any questions the property owner(s) may have about the project.

Q. Please explain Transource PA's policy regarding the landowner's use of the right-of-way area.

A. Transource PA anticipates acquiring all the ROW and easements needed for the Rice-Ringgold Transmission Line. About 66% of the needed ROW route within Pennsylvania has already been obtained. Our desire and hope is to acquire the remaining property rights via private negotiations and avoid the use of eminent domain, which would only be used as a last resort. The owners of property traversed by the ROW will still be permitted to use their property provided it does not interfere with Transource PA's safe and reliable operation of the aerial transmission line. Certain landowner activities will be prohibited within the ROW, such as: planting or cultivating any trees; placing any temporary or permanent building, structure, improvement or obstruction, including but not limited to,

storage tanks, billboards, signs, sheds, dumpsters, light poles, water impoundments, above ground irrigation systems, swimming pools or wells; or permitting any alteration of the ground elevation over or within the right-of-way. However, Transource PA may, on a case-by-case basis, grant an exception to a prohibited activity in certain circumstances where it is reasonable to do so and the activity does not interfere with Transource PA's rights and ability to safely and reliably operate the transmission line.

Q. Does Transource PA have a formal plan for addressing vegetation management along its transmission line ROW that is applicable to Project 9A West?

A. Yes. I am sponsoring Attachment 12 of the Siting Application, which is American Electric Power's, Transource PA's affiliate, Transmission Vegetation Management Program ("TVMP") dated July 31, 2025. The TVMP describes, among other things, how Transource PA and its affiliates seek to ensure compliance with relevant reliability standards through its management of vegetation along the transmission line ROW. The goal of the TVMP is to minimize encroachments from vegetation located adjacent to transmission line ROW, thereby preventing vegetation-related outages that could impact system reliability and ultimately service to customers.

Q. Please explain the status of Transource PA's attempts to acquire ROW and/or easements for the 9A West Project.

A. There are a total of 102 landowners (85 in Pennsylvania) and 129 parcels (108 in Pennsylvania) along the route selected for the proposed 9A West Project. Transource PA is continuing to negotiate with all affected landowners who have not yet provided ROW by agreement to reach a reasonable and mutually acceptable right-of-way agreement. Transource PA has not yet been able to complete negotiations and acquire all the ROW

needed for the entire 9A West Project. In the event Transource PA is unable to acquire all the ROW needed for the entire 9A West Project, Transource PA will promptly file and serve separate applications seeking Commission approval to exercise the power of eminent domain to acquire rights-of-way and easements for the proposed 9A West Project. Although Transource PA's strong preference is to reach agreement with all landowners on ROW, if any such condemnation applications become necessary, Transource PA will request that they be consolidated with this Siting Application proceeding for the 9A West Project and considered during its pendency.

Q. Does this complete your direct testimony?

A. Yes, it does. However, I reserve the right to file such additional testimony as may be necessary or appropriate during the course of this proceeding.

VERIFICATION

I, Michael Mechler, Director of Right-of-Way and Infrastructure, Western Land Services, Inc., hereby state that the facts set forth above 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).

Date: May 21, 2026

By: Michael Mechler

Michael Mechler, Director of Right-of-Way and Infrastructure
Western Land Services, Inc.

VERIFICATION

I, Evan K. Dean, Managing Director, Transmission Joint Ventures Governance and Operations, hereby state that the facts set forth above 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).

Date: May 21, 2026

By: _____

Evan K. Dean, Managing Director
Transmission Joint Ventures Governance
and Operations

BEFORE THE
PENNSYLVANIA PUBLIC UTILTIY 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 County, Pennsylvania	:	Docket No. P-2026-_____

CERTIFICATE OF SERVICE

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

Via Certified Mail, Return Receipt Requested

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 Office of Small Business Advocate
555 Walnut Street, 1st Floor Forum Place
Harrisburg, Pennsylvania 17101
Attn: NazArah Sabree

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

Pennsylvania Office of Consumer Advocate
555 Walnut Street 5th Floor Forum Place
Harrisburg, Pennsylvania 17101-1923
Attn: Darryl A. Lawrence, Consumer Advocate

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

Guildford Township Supervisors
Attn: Don Clapper, Chairman
115 Spring Valley Road
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.
5400 Westheimer Court
Houston, TX 77056

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

Dominion Energy
5000 Dominion Boulevard
Glen Allen, VA 23060

Date: May 21, 2026

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