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

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-

Petition of Transource Pennsylvania, LLC for Confirmation of an Exemption from Local Zoning Regulation and for the Construction of Buildings in connection with the Construction of a Proposed Electric Substation in Greene Township, Franklin County, Pennsylvania
Docket No. P-2026-

Dear Secretary Homsher:


Enclosed for filing please find Transource PA's Motion to Consolidate the above referenced matters that have been filed today with the Pennsylvania Public Utility Commission under separate covers.

Copies of the Motion are being served according to the attached Certificate of Service.

Thank you for your attention to this matter.

Sincerely,

BUCHANAN INGERSOLL & ROONEY PC

By: 

John F. Povilaitis, Esquire

JFP/psm
Enclosure
cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

Application of Transource Pennsylvania, :
LLC filed Pursuant to 52 Pa. Code Chapter :
57, Subchapter G, for Approval of the : Docket No. A-2026-_____
Siting and Construction of the 230 kV :
Transmission Line known as Project 9A :
West in a Portion of Franklin County, :
Pennsylvania :

Petition of Transource Pennsylvania, LLC :
for Confirmation of an Exemption from :
Local Zoning Regulation and for the : Docket No. P-2026-_____
Construction of Buildings in connection :
with the Construction of a Proposed :
Electric Substation in Greene Township, :
Franklin County, Pennsylvania :

**MOTION OF TRANSOURCE PENNSYLVANIA, LLC TO CONSOLIDATE
PROCEEDINGS AND FOR TIMLEY DISPOSITION**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Transource Pennsylvania, LLC ("Transource PA" or the "Company") hereby files,
pursuant to 52 Pa. Code § 5.103 and 5.81, this Motion to Consolidate Proceedings (“Motion”) in
connection with three separate but interrelated matters simultaneously filed on May 21, 2026 by

Transource PA with the Pennsylvania Public Utility Commission (“PUC” or “Commission”) and, in connection therewith, represents as follows:

I. Background

1. 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.

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

3. Transource PA is an existing regulated transmission-only public utility in Peach Bottom Township, York County, 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.

4. On May 21, 2026, Transource PA filed an 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 Application”).

5. On May 21, 2026, Transource PA also filed, pursuant to the PaPUC’s regulations at 52 Pa. Code Section 57, Chapter 57, an Application for Approval of the Siting and

Construction of the 230 kilovolt (“kV”) Transmission Line known as the “9A West Project” in a Portion of Franklin County, Pennsylvania (“Siting Application”).

6. On May 21, 2026, Transource PA filed a Petition of Transource Pennsylvania, LLC for Confirmation of an Exemption from Local Zoning Regulation and for the Construction of Buildings in connection with the Construction of a Proposed Electric Substation in Greene Township, Franklin County, Pennsylvania (“Zoning Petition”).

7. As described further below and in the CPC Application, the Siting Application and the Zoning Petition all of which are incorporated by reference herein, such pleadings and related proceedings relate to Transource PA’s legal obligation to construct and operate a 230 kV electric transmission line extending from the new Rice Substation to the Pennsylvania-Maryland border, in a portion of Franklin County, Pennsylvania.

8. As further described in the CPC Application and the Siting Application, PJM Interconnection, L.L.C.¹ (“PJM”), a regional transmission organization approved by the Federal Energy Regulatory Commission (“FERC”) and responsible for 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, has directed that Transource PA construct and operate the 9A West Project.

II. Request for Consolidation of Proceedings and Timely Disposition

9. For the reasons set forth herein, Transource PA requests that the above captioned proceedings involving the CPC Application, the Siting Application and the Zoning Petition be

¹PJM 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>

formally consolidated into a single proceeding for all purposes including, hearings, briefing and a final decision by the PaPUC.

10. 52 Pa. Code § 5.81(a) provides that:

The Commission or presiding officer, with or without motion, may order proceedings involving a common question of law or fact to be consolidated. The Commission or presiding officer may make orders concerning the conduct of the proceeding as may avoid unnecessary costs or delay.²

11. Among the considerations for consolidation are: (a) whether additional issues exist that could cloud the determination of common issues; (b) whether consolidation will reduce litigation costs and decision-making for the parties and the Commission; (c) whether the issues in one proceeding go to the heart of an issue in the other proceeding; (d) whether consolidation will unduly protect a hearing or produce a disorderly or unwieldy record; (e) whether different statutory and legal issues are involved; (f) whether the party with the burden of proof differs in the proceedings; (g) whether consolidation will unduly delay the resolution of one of the proceedings; and (h) whether supporting data in both proceedings will be repetitive.³ As the Commission has previously determined, no single consideration, or group of these considerations, is dispositive of consolidation. Rather, all factors must be evaluated, and a balancing of those favoring and disfavoring consolidation is required.⁴

²See *Pa. Pub. Util. Comm'n v. Pittsburgh Water and Sewer Auth.*, Docket No. R-2021-3024773, Prehearing Order issued June 8, 2021 (Consolidating Pittsburgh Water's R-2021 Rate Case Proceedings to use combined water, wastewater, and stormwater revenue requirements.). See, e.g., additional cases that have been consolidated for adjudication, *Re Middletown Taxi Co.*, 50 Pa. PUC 263 (1976); for hearing, *City of York v. York Telephone and Telegraph Co.*, 43 Pa. PUC 240 (1967); for briefing, *Clepper Farms, Inc. v. Grantham Water Co.*, 41 Pa. PUC 749 (1965); or for all purposes, *Commonwealth of Pa. v. Respond Power LLC*, Docket No. C-2014-2427659 and *Pa. Pub. Util. Comm'n v. Respond Power LLC*, Docket No. C-2014-2438640 (Interim Order dated Oct. 28, 2014).

³ See *Pa. Pub. Util. Comm'n v. City of Lancaster Sewer Fund*, Docket No. R-2012-2310366, at 3-4 (Second Prehearing Order Nov. 26, 2012).

⁴ *Id.* at 3.

12. The CPC Application, the Siting Application and the Zoning Petition are interrelated and raise common issues of law and fact. Indeed, Transource PA must be a certificated public utility via the granting of a certificate of public convenience in Pennsylvania (as requested in the CPC Application) in order to file and obtain the relief requested in the Siting Application to obtain the PaPUC's approval to site the 230 kV electric transmission line that is an integral part of the 9A West Project and to file and seek the relief requested in the Zoning Petition.

13. Formal consolidation of the CPC Application, the Siting Application and the Zoning Petition as requested herein for all purposes is warranted and in the public interest, the interest of the parties, and in the interest of the PaPUC. Consolidation of the above-captioned proceedings will promote the efficient use of the time and resources of the parties and the PaPUC and will not delay the resolution of the proceedings. Consolidation of the CPC Application, the Siting Application and the Zoning Petition will advance administrative economy. For example, consolidation for purposes of the discovery and hearing will avoid the need for the parties to submit testimony in two separate proceedings. Similarly for purposes of briefing and adjudication, consolidation will avoid the need for multiple briefs to be filed, two Recommended Decisions to be served, and two separate PaPUC orders to be entered. Thus, consolidation of the above-captioned proceedings will avoid unnecessary costs or delay, is plainly in the public interest and consistent with the standards for consolidation specified in 52 Pa. Code § 5.81(a).

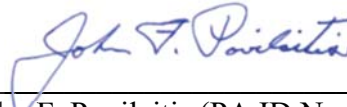
14. The Designated Entity Agreement ("DEA") between PJM and Transource PA for the 9A West Project has a projected in-service date of January 19, 2029. In Order for Transource PA to meet that projected in-service date, Transource PA requests that a final decision on the

consolidated proceedings should be issued no later than February 22, 2027 to allow for unanticipated contingencies and timely completion of construction.

III. CONCLUSION

WHEREFORE, Transource Pennsylvania, LLC respectfully requests that the Pennsylvania Public Utility Commission (i) consolidate the Siting Application, the CPC Application and the Zoning Petition for all purposes including, without limitation, hearings, briefing and a final decision, (ii) set a procedural schedule that allows for a final PUC decision by no later than February 22, 2027 and (iii) grant Transource PA such other relief as may be just and reasonable under the circumstances.

Respectfully submitted,



Dated: May 21, 2026

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Attorneys for Transource Pennsylvania, LLC

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Franklin County, Pennsylvania :

CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served a copy of the Motion to Consolidate Proceedings and for Timely Disposition on the following persons in the manner specified in accordance with the requirements of 52 Pa. Code §1.54:

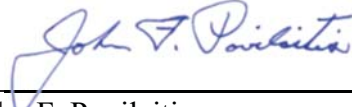
Via Certified Mail, Return Receipt Requested:

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 Office of Consumer Advocate
555 Walnut Street 5th Floor Forum Place
Harrisburg, Pennsylvania 17101-1923
Attn: Darryl A. Lawrence, Consumer Advocate

Date: May 21 2026



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