

## **Letters Received as of February 21, 2025 Regarding Proposed Transmission Upgrades in Advance of the PJM Board of Managers February, 2025 Meeting**

The following emails and letters were submitted to the Secretary of the PJM Members Committee - David Anders - pursuant to the Board Communications process and are being posted pursuant to that process. A response will be provided to these communications, which will be posted on the Board Communications page as well.

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**From:** Michelle Henry < >

**Sent:** Monday, January 27, 2025 8:18 AM

**To:** Anders, David < >

**Subject:** Opposition to Project 262 2024 Window 1 – (708) 765kV 261-mile transmission line

Attention:

The PJM Board of Managers  
Mark Takahashi, Chairman and  
Manu Asthana, PJM President and CEO  
PJM Interconnection L.L.C.  
2750 Monroe Boulevard  
Audubon, Pennsylvania 19408

I am strongly opposed to Project 262 of the 2024 Window 1 projects. For the reasons set forth below. I urge the PJM Board of Managers to reject PJM 2024 Window 1 Project 262.

This project was not competitively bid or awarded. Incumbent utilities FirstEnergy, American Electric Power and Dominion made a joint proposal thwarting competition. The utilities did not have to compete with each other to propose a project that was cost effective for ratepayers and the project bid did not include any cost caps! Additionally, the project is under bid as it is based on Guyed V-lattice tower construction. Not only won't this work across most of the terrain, Guyed V-lattice towers are possibly the foulest, most land use restrictive, intensive and invasive electric infrastructure available!

The Constructability and Financial Analysis of the project was not performed as required. The process for the analysis listed on PJM RTEP 2024 Window 1 Constructability Analysis Pg.16, required a review of land use mapping that identified residences within both 100 feet and 250 feet of the proposed line, along with identification of conservation easements, public land, and historic structures and districts in acres and the count as well as a Public Lands mapping review with types, acreage and counts (etc). PJM did not perform this analysis at all. The maps of the project indicate the project will be built on existing easements when PJM has stated that it will require a new easement 200' for its entire 261-mile length.

The impacts of this proposal are being intentionally trivialized and glossed over. The proposed route crosses 15 miles of private property and conservation easements in Western Loudoun County that would be subject to eminent domain takings of 200' easements. Another @365 acres of private property to be taken to support data center expansion. This impacts the same area in Western Loudoun County that is the target of the new 500kV transmission line that was approved by PJM's Board of Managers in August of 2024 (Alternate MARL Re-Route) which is expected to take additional easements as well!

Project 262 (similarly to Alternate MARL Re-Route) will cross Harpers Ferry National Park, the Appalachian Trail, and the C&O Canal National Park and will destroy the scenic and historic value of these assets.

This will be a third transmission tower even bigger than the other two - a 500kV plus a 500kV with a 138kV underbuild plus a 765kV Guyed V-lattice structure beside it! This will have a devastating effect on property owners all along the route and will render thousands of acres of property worthless!

Project 262 was rated the most risky project for its In-Service Date of 2029 due to both schedule and constructability risks. Project 262 is NOT the only solution for transmission nor is transmission the only solution for the data center expansion / projected energy load in Loudoun County, Virginia.

Once again, I urge the PJM Board of Managers to reject PJM 2024 Window 1 Project 262 .

Sincerely,  
Michelle Henry

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**From:** Corinne Pitts < >

**Sent:** Monday, January 27, 2025 8:47 AM

**To:** Anders, David < >

**Subject:** Opposition to Project 262 / 7082024 Window 1 – 765kV 261-mile transmission line  
To PJM Board of Managers,

Requesting you please consider the below factors and **deny** approval of Project 262.

As a homeowner along the Potomac River in Loudoun County, this project would have serious impacts to the natural, scenic and historic areas along the river. Harpers Ferry is a national treasure and is such a draw for outdoor enthusiasts around the world. Having this project cross through the park and obstruct views will destroy this beautiful and unique place.

Additionally I am very concerned about the effects it will have on wildlife in this area. There are numerous Peregrine falcons, bald eagles, and the RARE Allegheny woodrats in the Harpers Ferry area whose habitats could be affected by this construction. At my own home we have a bald eagle nest and they are very sensitive to sound and activity nearby, and this could disturb their nest and young eagles. The rare and diverse habitats along the Potomac need to be protected.

Please see below additional reasons to deny this project:

1) The project was not competitively bid or awarded. PJM utilities FirstEnergy, American Electric Power and Dominion made a joint proposal in order to thwart competition and fix prices. The utilities did not have to compete with each other to propose a project that was cost effective for ratepayers, and the project bid did not include any cost caps. Even then, project is under bid as it is based on "cheaper" Guyed V-lattice tower construction which will not work due to terrain. Guyed V-lattice towers are possibly the foulest, most land use restrictive, intensive and invasive electric infrastructure available!

2) PJM's Constructability and Financial Analysis of the project was not performed as required. PJM's stated process for the analysis required a review of land use mapping that identified residences within

both 100 feet and 250 feet of the proposed line, along with identification of conservation easements, public land, and historic structures and districts in acres and the count as well as a Public Lands mapping review with types, acreage and counts (etc). PJM did not perform this analysis at all.

3) PJM's maps of the project claim the project will be built on existing easements when PJM has stated that it will require a new easement for its entire 261-mile length. The proposed route crosses 15 miles of private property and conservation easements in Western Loudoun County that would be subject to eminent domain taking for a new 200' easement. This is another @365 acres of private property just in Loudoun to be taken to support data center expansion. This will have a devastating effect on property owners all along the route.

4)The project will cross Harpers Ferry National Park, the Appalachian Trail, and the C&O Canal National Park, it will run parallel down the view shed of the Potomac River and will destroy the scenic and historic value of these assets.

5) Project 262 was rated the most risky project for its In-Service Date of 2029 due to both schedule and constructability risks. PJM's Reliability Report states that PJM is attempting to manage this risk by extending the In Service Date to 2032.

6)The project is another extension cord to export coal-fired electric resources from West Virginia's aging coal generation plants (in this case John Amos built in 1971) into Virginia.

7) Project 262 is NOT the only solution for transmission nor is transmission the only solution for the data center expansion / projected energy load in Loudoun County, Virginia.

Thank you for your consideration,  
Corinne Pitts

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**Sent:** Monday, January 27, 2025 9:16 AM

**To:** Anders, David < >

**Subject:** Opposition to Project 262 2024 Window 1-(708) 765k 261-mile transmission line

I am strongly opposed to Project 262 of the 2024 Window 1 projects. For the reasons set forth below, I urge the PJM Board of Managers **to reject** PJM 2024 Window 1 Project 262.

This project was not competitively bid or awarded. Incumbent utilities FirstEnergy, American Electric Power and Dominion made a joint proposal thwarting competition. The utilities did not have to compete with each other to propose a project that was cost effective for ratepayers and the project bid did not include any cost caps! Additionally, the project is under bid as it is based on Guyed V-lattice tower construction. Not only won't this work across most of the terrain, ***Guyed V-lattice towers are possibly the foulest, most land use restrictive, intensive and invasive electric infrastructure available!***

The Constructability and Financial Analysis of the project was not performed as required. The process for the analysis listed on **PJM RTEP 2024 Window 1 Constructability Analysis Pg.16**, required a review of land use mapping that identified residences within both 100 feet and 250 feet of the proposed line, along with identification of conservation easements, public land, and historic structures and districts ***in acres*** and the count as well as a Public Lands mapping review with types, acreage and counts (etc). ***PJM did not perform this analysis at all.*** The maps of the project indicate the project will be built on existing easements when ***PJM has stated that it will require a new easement 200' for its entire 261-mile length.***

The impacts of this proposal are being intentionally trivialized and glossed over. The **proposed route crosses 15 miles of private property and conservation easements in Western Loudoun County** that would be subject to eminent domain takings of 200' easements. **Another @365 acres of private property to be taken to support data center expansion.** This impacts the same area in Western Loudoun County that is the target of the new 500kV transmission line that was approved by PJM's Board of Managers in August of 2024 (Alternate MARL Re-Route) which is expected to take additional easements as well!

Project 262 (similarly to Alternate MARL Re-Route) will cross ***Harpers Ferry National Park, the Appalachian Trail, and the C&O Canal National Park and will destroy the scenic and historic value of these assets.***

This will be a third transmission tower even bigger than the other two - a 500kV plus a 500kV with a 138kV underbuild plus a 765kV Guyed V-lattice structure beside it! This will have a devastating effect on property owners all along the route and will render thousands of acres of property worthless.

I moved to rural Loudoun for the natural beauty of the area, and this project will destroy that. This project is in direct violation of the zoning of our properties.

Project 262 *was rated the most risky project* for its In-Service Date of 2029 due to both schedule and constructability risks. ***Project 262 is NOT the only solution for transmission nor is transmission the only solution for the data center expansion / projected energy load in Loudoun County, Virginia.***

Once again, I urge the PJM Board of Managers **to reject** PJM 2024 Window 1 Project 262 .

Sincerely,  
Arva Estep  
Lovettsville, VA

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*January 27, 2025*

**VIA ELECTRONIC MAIL**

The PJM Board of Managers  
Mark Takahashi, Chairman and  
Manu Asthana, PJM President and CEO  
PJM Interconnection L.L.C.  
2750 Monroe Boulevard  
Audubon, Pennsylvania 19408

RE: Opposition to Project 262 2024 Window 1 – (708) 765kV 261-mile transmission line

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Project 262 (similarly to Alternate MARL Re-Route) will cross *the Monongahela National Forest, Appalachian National Scenic Trail, Chesapeake & Ohio Canal National Historical Park, Harpers Ferry National Historical Park, Potomac Heritage National Scenic Trail and it will run parallel down the view shed of the Potomac River and will destroy the scenic and historic value of these assets.*

This will be a third transmission tower even bigger than the other two - a 500kV plus a 500kV with a 138kV underbuild plus a 765kV Guyed V-lattice structure beside it! This will have a devastating effect on property owners all along the route and will render thousands of acres of property worthless!

**The proposed transmission line threatens to disrupt the natural beauty and ecosystems that define our rural town. Lovettsville is home to forests, wildlife, farmland, etc., which could be irreparably harmed by the construction and maintenance of such infrastructure. Clearing land for transmission towers and lines may lead to deforestation, soil erosion, and habitat destruction, endangering local wildlife and undermining efforts to preserve our natural heritage.**

**High-voltage transmission lines have been associated with potential health risks due to prolonged exposure to electromagnetic fields (EMFs). While research on this subject is ongoing, the possibility of increased health risks for residents, particularly children and the elderly, is a matter of significant concern. Additionally, transmission lines pose safety risks, such as the potential for fires and accidents during severe weather events.**

**The construction of a high-voltage transmission line could diminish property values in our town, as potential buyers may be deterred by the visual impact and perceived risks associated with living near such infrastructure. For many residents, their homes are their most significant investments, and a decrease in property value could cause undue financial hardship. Furthermore, the presence of transmission lines could deter tourism and other industries that rely on the town's rural charm.**

**I urge the power company to explore alternative solutions that do not require the construction of a high-voltage transmission line through our town. Options such as upgrading existing infrastructure, investing in underground lines, or pursuing renewable energy sources should be thoroughly evaluated. Moreover, the lack of transparent communication and genuine consultation with our community regarding this proposal is**

**unacceptable. Residents deserve to have their voices heard and their concerns addressed before any decisions are made.**

Project 262 *was rated the most risky project* for its In-Service Date of 2029 due to both schedule and constructability risks. *Project 262 is NOT the only solution for transmission nor is transmission the only solution for the data center expansion / projected energy load in Loudoun County, Virginia.*

Once again, I urge the PJM Board of Managers **to reject** PJM 2024 Window 1 Project 262.

Sincerely,

***Emmett George***  
***Lovettsville, VA***

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**From:** Desiree Peyman < >

**Sent:** Monday, January 27, 2025 1:11 PM

**To:** Anders, David < >

**Subject:** Opposition to Project 262 2024 Window 1 – (708) 765kV 261-mile transmission line

Attention:

The PJM Board of Managers

Mark Takahashi, Chairman and

Manu Asthana, PJM President and CEO

PJM Interconnection L.L.C.

2750 Monroe Boulevard

Audubon, Pennsylvania 19408

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would be subject to eminent domain takings of 200' easements. Another @365 acres of private property to be taken to support data center expansion. This impacts the same area in Western Loudoun County that is the target of the new 500kV transmission line that was approved by PJM's Board of Managers in August of 2024 (Alternate MARL Re-Route) which is expected to take additional easements as well!

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Project 262 was rated the most risky project for its In-Service Date of 2029 due to both schedule and constructability risks. Project 262 is NOT the only solution for transmission nor is transmission the only solution for the data center expansion / projected energy load in Loudoun County, Virginia. Once again, I urge the PJM Board of Managers to reject PJM 2024 Window 1 Project 262 .

Sincerely,  
Desiree Peyman

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**From:** Tara Ward < >

**Sent:** Monday, January 27, 2025 2:29 PM

**To:** Anders, David < >

**Subject:** Opposition to Project 262 2024 Window 1 – (708) 765kV 261-mile transmission line

Attention: The PJM Board of Managers Mark Takahashi, Chairman and Manu Asthana, PJM President and CEO PJM Interconnection L.L.C. 2750 Monroe Boulevard Audubon, Pennsylvania 19408 I am strongly opposed to Project 262 of the 2024 Window 1 projects. For the reasons set forth below. I urge the PJM Board of Managers to reject PJM 2024 Window 1 Project 262. This project was not competitively bid or awarded. Incumbent utilities FirstEnergy, American Electric Power and Dominion made a joint proposal thwarting competition. The utilities did not have to compete with each other to propose a project that was cost effective for ratepayers and the project bid did not include any cost caps! Additionally, the project is under bid as it is based on Guyed V-lattice tower construction. Not only won't this work across most of the terrain, Guyed V-lattice towers are possibly the foulest, most land use restrictive, intensive and invasive electric infrastructure available. The Constructability and Financial Analysis of the project was not performed as required. The process for the analysis listed on PJM RTEP 2024 Window 1 Constructability Analysis Pg.16, required a review of land use mapping that identified residences within both 100 feet and 250 feet of the proposed line, along with identification of conservation easements, public land, and historic structures and districts in acres and the count as well as a Public Lands mapping review with types, acreage and counts (etc). PJM did not perform this analysis at all. The maps of the project indicate the project will be built on existing easements when PJM has stated that it will require a new easement 200' for its entire 261-mile length. The impacts of this proposal are being intentionally trivialized and glossed over. The proposed route crosses 15 miles of private property and conservation easements in Western Loudoun County that would be subject to eminent domain takings of 200' easements. Another @365 acres of private property to be taken to support data center expansion. This impacts the same area in Western Loudoun County that is the target of the new 500kV transmission line that



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Tara Ward  
Brunswick, MD

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January 27, 2025

VIA ELECTRONIC MAIL

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Mark Takahashi, Chairman and  
Manu Asthana, PJM President and CEO  
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private property to be taken to support data center expansion. This impacts the same area in Western Loudoun County that is the target of the new 500kV transmission line that was approved by PJM's Board of Managers in August of 2024 (Alternate MARL Re-Route) which is expected to take additional easements as well!

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The proposed transmission line threatens to disrupt the natural beauty and ecosystems that define our rural town. Lovettsville is home to forests, wildlife, farmland, etc., which could be irreparably harmed by the construction and maintenance of such infrastructure. Clearing land for transmission towers and lines may lead to deforestation, soil erosion, and habitat destruction, endangering local wildlife and undermining efforts to preserve our natural heritage.

High-voltage transmission lines have been associated with potential health risks due to prolonged exposure to electromagnetic fields (EMFs). While research on this subject is ongoing, the possibility of increased health risks for residents, particularly children and the elderly, is a matter of significant concern. Additionally, transmission lines pose safety risks, such as the potential for fires and accidents during severe weather events.

The construction of a high-voltage transmission line could diminish property values in our town, as potential buyers may be deterred by the visual impact and perceived risks associated with living near such infrastructure. For many residents, their homes are their most significant investments, and a decrease in property value could cause undue financial hardship.

Furthermore, the presence of transmission lines could deter tourism and other industries that rely on the town's rural charm.

I urge the power company to explore alternative solutions that do not require the construction of a high-voltage transmission line through our town. Options such as upgrading existing infrastructure, investing in underground lines, or pursuing renewable energy sources should be thoroughly evaluated. Moreover, the lack of transparent communication and genuine consultation with our community regarding this proposal is unacceptable. Residents deserve to have their voices heard and their concerns addressed before any decisions are made.

Project 262 was rated the riskiest project for its In-Service Date of 2029 due to both schedule and constructability risks. Project 262 is NOT the only solution for transmission nor is transmission the only solution for the data center expansion / projected energy load in Loudoun County, Virginia.

Once again, I urge the PJM Board of Managers to reject PJM 2024 Window 1 Project 262.

Sincerely,  
Megan Rettew  
Lovettsville, VA

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*January 27, 2025*

**VIA ELECTRONIC MAIL**

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Manu Asthana, PJM President and CEO  
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Sincerely,

***Terri Barnett***  
***Lovettsville, VA***

---

**From:** Charles Lathrop < >

**Sent:** Tuesday, January 28, 2025 7:58 AM

**To:** Anders, David < >

**Subject:** Subject: Opposition to Project 262 / 708 2024 Window 1 – 765kV 261-mile transmission line

As a landowner adjacent to the current right of way that this line would expand, I'm opposed to this proposed project for the following reasons:

1) The project was not competitively bid or awarded. PJM utilities FirstEnergy, American Electric Power and Dominion made a joint proposal in order to thwart competition and fix prices. The utilities did not have to compete with each other to propose a project that was "cost effective" for ratepayers, and the project bid did not include any cost caps. Even then, the project is under bid as it is based on "cheaper" Guyed V-lattice tower construction which will not work due to terrain. Guyed V-lattice towers are possibly the foulest, most land use restrictive,

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3) PJM's maps of the project claim the project will be built on existing easements when PJM has stated that it will require a new easement for its entire 261-mile length. The proposed route crosses 15 miles of private property and conservation easements in Western Loudoun County that would be subject to eminent domain taking for a new 200' easement. This is another @365 acres of private property just in Loudoun to be taken to support data center expansion. This will have a devastating effect on property owners all along the route.

4)The project will cross the Monongahela National Forest, Appalachian National Scenic Trail, Chesapeake & Ohio Canal National Historical Park, Harpers Ferry National Historical Park, Potomac Heritage National Scenic Trail and it will run parallel down the view shed of the Potomac River and will severely impact / destroy the scenic and historic value of these assets.

5) Project 262 was rated the most risky project for its In-Service Date of 2029 due to both schedule and constructability risks. PJM's Reliability Report states that PJM is attempting to manage this risk by extending the In Service Date to 2032.

6)The project is another extension cord to export coal-fired electric resources from West Virginia's aging coal generation plants (in this case John Amos built in 1971) into Virginia. While I am not opposed to coal as a source of power generation, I'm furious that as Virginia citizens and property owners we're expected to shoulder the burden for the General Assembly's and Dominion's poor policy choices and lack of planning for the explosive growth of the data center industry as well as Federal and State goals for electrification and the grid capacity required to support it.

7) Project 262 is NOT the only solution for transmission nor is transmission the only solution for the data center expansion / projected energy load in Loudoun County, Virginia. The focus should be on expanding Virginia's natural gas power generation, re-starting SW Virginia's coal plants and fast-tracking nuclear power generation rather than buying power from out of state because the pie-in-the sky "green" energy (solar/wind/battery) plans mandated under VCEA are pathetically inadequate for current and future power needs in Virginia and the region.

Charles Lathrop  
Lovettsville, VA

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**From:** Helen Lightner < >

**Sent:** Tuesday, January 28, 2025 9:11 AM

**To:** Anders, David < >

**Subject:** Opposition to Project 262 2024 Window 1 – (708) 765kV 261-mile transmission line

Attention: The PJM Board of Managers Mark Takahashi, Chairman and Manu Asthana, PJM President and CEO PJM Interconnection L.L.C. 2750 Monroe Boulevard Audubon, Pennsylvania 19408 I am strongly opposed to Project 262 of the 2024 Window 1 projects. For the reasons set forth below. I urge the PJM Board of Managers to reject PJM 2024 Window 1 Project 262. This project was not competitively bid or awarded. Incumbent utilities FirstEnergy, American Electric Power and Dominion made a joint proposal thwarting competition. The utilities did not have to compete with each other to propose a project that was cost effective for ratepayers and the project bid did not include any cost caps! Additionally, the project is under bid as it is based on Guyed V-lattice tower construction. Not only won't this work across most of the terrain, Guyed V-lattice towers are possibly the foulest, most land use restrictive, intensive and invasive electric infrastructure available! The Constructability and Financial Analysis of the project was not performed as required. The process for the analysis listed on PJM RTEP 2024 Window 1 Constructability Analysis Pg.16, required a review of land use mapping that identified residences within both 100 feet and 250 feet of the proposed line, along with identification of conservation easements, public land, and historic structures and districts in acres and the count as well as a Public Lands mapping review with types, acreage and counts (etc). PJM did not perform this analysis at all. The maps of the project indicate the project will be built on existing easements when PJM has stated that it will require a new easement 200' for its entire 261-mile length. The impacts of this proposal are being intentionally trivialized and glossed over. The proposed route crosses 15 miles of private property and conservation easements in Western Loudoun County that would be subject to eminent domain takings of 200' easements. Another @365 acres of private property to be taken to support data center expansion. This impacts the same area in Western Loudoun County that is the target of the new 500kV transmission line that was approved by PJM's Board of Managers in August of 2024 (Alternate MARL Re-Route) which is expected to take additional easements as well! Project 262 (similarly to Alternate MARL Re-Route) will cross Harpers Ferry National Park, the Appalachian Trail, and the C&O; Canal National Park and will destroy the scenic and historic value of these assets. This will be a third transmission tower even bigger than the other two - a 500kV plus a 500kV with a 138kV underbuild plus a 765kV Guyed V-lattice structure beside it! This will have a devastating effect on property owners all along the route and will render thousands of acres of property worthless! Project 262 was rated the most risky project for its In-Service Date of 2029 due to both schedule and constructability risks. Project 262 is NOT the only solution for transmission nor is transmission the only solution for the data center expansion / projected energy load in Loudoun County, Virginia. Once again, I urge the PJM Board of Managers to reject PJM 2024 Window 1 Project 262 . Sincerely,

Helen Lightner

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**From:** KATHLEEN NUNES <>

**Sent:** Tuesday, January 28, 2025 12:42 PM

**To:** Anders, David <>

**Subject:** Opposition to Project 262 2024 Window 1 – (708) 765kV 261-mile transmission line

Attention: The PJM Board of Managers Mark Takahashi, Chairman and Manu Asthana, PJM President and CEO PJM Interconnection L.L.C. 2750 Monroe Boulevard Audubon, Pennsylvania 19408

I am strongly opposed to Project 262 of the 2024 Window 1 projects. For the reasons set forth below.

I urge the PJM Board of Managers to reject PJM 2024 Window 1 Project 262. This project was not competitively bid or awarded. Incumbent utilities FirstEnergy, American Electric Power and Dominion made a joint proposal thwarting competition. The utilities did not have to compete with each other to propose a project that was cost effective for ratepayers and the project bid did not include any cost caps! Additionally, the project is under bid as it is based on Guyed V-lattice tower construction. Not only won't this work across most of the terrain, Guyed V-lattice towers are possibly the foulest, most land use restrictive, intensive and invasive electric infrastructure available! The Constructability and Financial Analysis of the project was not performed as required. The process for the analysis listed on PJM RTEP 2024 Window 1 Constructability Analysis Pg.16, required a review of land use mapping that identified residences within both 100 feet and 250 feet of the proposed line, along with identification of conservation easements, public land, and historic structures and districts in acres and the count as well as a Public Lands mapping review with types, acreage and counts (etc). PJM did not perform this analysis at all. The maps of the project indicate the project will be built on existing easements when PJM has stated that it will require a new easement 200' for its entire 261-mile length. The impacts of this proposal are being intentionally trivialized and glossed over. The proposed route crosses 15 miles of private property and conservation easements in Western Loudoun County that would be subject to eminent domain takings of 200' easements. Another @365 acres of private property to be taken to support data center expansion. This impacts the same area in Western Loudoun County that is the target of the new 500kV transmission line that was approved by PJM's Board of Managers in August of 2024 (Alternate MARL Re-Route) which is expected to take additional easements as well! Project 262 (similarly to Alternate MARL Re-Route) will cross Harpers Ferry National Park, the Appalachian Trail, and the C&O; Canal National Park and will destroy the scenic and historic value of these assets. This will be a third transmission tower even bigger than the other two - a 500kV plus a 500kV with a 138kV underbuild plus a 765kV Guyed V-lattice structure beside it! This will have a devastating effect on property owners all along the route and will render thousands of acres of property worthless! Project 262 was rated the most risky project for its In-Service Date of 2029 due to both schedule and constructability risks.

Project 262 is NOT the only solution for transmission nor is transmission the only solution for the data center expansion / projected energy load in Loudoun County, Virginia. Once again, I urge the PJM Board of Managers to reject PJM 2024 Window 1 Project 262 .

Sincerely,

Kathleen Nunes

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**From:** Brian Wallace < >

**Sent:** Tuesday, January 28, 2025 6:47 PM

**To:** Anders, David < >

**Subject:** Opposition to Project 262 2024 Window 1 – (708) 765kV 261-mile transmission line

Attention: The PJM Board of Managers Mark Takahashi, Chairman and Manu Asthana, PJM President and CEO PJM Interconnection L.L.C. 2750 Monroe Boulevard Audubon, Pennsylvania 19408 I am strongly opposed to Project 262 of the 2024 Window 1 projects. For the reasons set forth below. I urge the PJM Board of Managers to reject PJM 2024 Window 1 Project 262. This project was not competitively bid or awarded. Incumbent utilities FirstEnergy, American Electric Power and Dominion made a joint proposal thwarting competition. The utilities did not have to compete with each other to propose a project that was cost effective for ratepayers and the project bid did not include any cost caps! Additionally, the project is under bid as it is based on Guyed V-lattice tower construction. Not only won't this work across most of the terrain, Guyed V-lattice towers are possibly the foulest, most land use restrictive, intensive and invasive electric infrastructure available! The Constructability and Financial Analysis of the project was not performed as required. The process for the analysis listed on PJM RTEP 2024 Window 1 Constructability Analysis Pg.16, required a review of land use mapping that identified residences within both 100 feet and 250 feet of the proposed line, along with identification of conservation easements, public land, and historic structures and districts in acres and the count as well as a Public Lands mapping review with types, acreage and counts (etc). PJM did not perform this analysis at all. The maps of the project indicate the project will be built on existing easements when PJM has stated that it will require a new easement 200' for its entire 261-mile length. The impacts of this proposal are being intentionally trivialized and glossed over. The proposed route crosses 15 miles of private property and conservation easements in Western Loudoun County that would be subject to eminent domain takings of 200' easements. Another @365 acres of private property to be taken to support data center expansion. This impacts the same area in Western Loudoun County that is the target of the new 500kV transmission line that was approved by PJM's Board of Managers in August of 2024 (Alternate MARL Re-Route) which is expected to take additional easements as well! Project 262 (similarly to Alternate MARL Re-Route) will cross Harpers Ferry National Park, the Appalachian Trail, and the C&O Canal National Park and will destroy the scenic and historic value of these assets. This will be a third transmission tower even bigger than the other two - a 500kV plus a 500kV with a 138kV underbuild plus a 765kV Guyed V-lattice structure beside it! This will have a devastating effect on property owners all along the route and will render thousands of acres of property worthless!



Project 262 was rated the most risky project for its In-Service Date of 2029 due to both schedule and constructability risks. Project 262 is NOT the only solution for transmission nor is transmission the only solution for the data center expansion / projected energy load in Loudoun County, Virginia. Once again, I urge the PJM Board of Managers to reject PJM 2024 Window 1 Project 262 . Sincerely,  
Brian Wallace  
Resident of Loudoun County, Virginia

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**From:** Andy < >

**Sent:** Tuesday, January 28, 2025 7:29 PM

**To:** Anders, David < >

**Subject:** Opposition to Project 262 2024 Window 1 – (708) 765kV 261-mile transmission line

Attention: The PJM Board of Managers Mark Takahashi, Chairman and Manu Asthana, PJM President and CEO PJM Interconnection L.L.C. 2750 Monroe Boulevard Audubon, Pennsylvania 19408 I am strongly opposed to Project 262 of the 2024 Window 1 projects. For the reasons set forth below. I urge the PJM Board of Managers to reject PJM 2024 Window 1 Project 262. This project was not competitively bid or awarded. Incumbent utilities FirstEnergy, American Electric Power and Dominion made a joint proposal thwarting competition. The utilities did not have to compete with each other to propose a project that was cost effective for ratepayers and the project bid did not include any cost caps! Additionally, the project is under bid as it is based on Guyed V-lattice tower construction. Not only won't this work across most of the terrain, Guyed V-lattice towers are possibly the foulest, most land use restrictive, intensive and invasive electric infrastructure available! The Constructability and Financial Analysis of the project was not performed as required. The process for the analysis listed on PJM RTEP 2024 Window 1 Constructability Analysis Pg.16, required a review of land use mapping that identified residences within both 100 feet and 250 feet of the proposed line, along with identification of conservation easements, public land, and historic structures and districts in acres and the count as well as a Public Lands mapping review with types, acreage and counts (etc). PJM did not perform this analysis at all. The maps of the project indicate the project will be built on existing easements when PJM has stated that it will require a new easement 200' for its entire 261-mile length. The impacts of this proposal are being intentionally trivialized and glossed over. The proposed route crosses 15 miles of private property and conservation easements in Western Loudoun County that would be subject to eminent domain takings of 200' easements. Another @365 acres of private property to be taken to support data center expansion. This impacts the same area in Western Loudoun County that is the target of the new 500kV transmission line that was approved by PJM's Board of Managers in August of 2024 (Alternate MARL Re-Route) which is expected to take additional easements as well! Project 262 (similarly to Alternate MARL Re-Route) will cross Harpers Ferry National Park, the Appalachian Trail, and the C&O Canal National Park and will destroy the scenic and historic value of these assets. This will be a third transmission tower even bigger than the other two - a 500kV plus a 500kV with a 138kV underbuild plus a 765kV Guyed V-lattice structure beside it! This will have a devastating effect on property owners all along the route and will render thousands of acres of property worthless! Project 262 was rated the most risky project for its In-Service Date of 2029 due to both schedule

and constructability risks. Project 262 is NOT the only solution for transmission nor is transmission the only solution for the data center expansion / projected energy load in Loudoun County, Virginia. Once again, I urge the PJM Board of Managers to reject PJM 2024 Window 1 Project 262 . Sincerely,

Andy Rider  
Resident of Loudoun County

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**From:** Jeff Chapman < >

**Sent:** Wednesday, January 29, 2025 11:31 AM

**To:** Anders, David < >

**Subject:** Opposition to Project 262 2024 Window 1 – (708) 765kV 261-mile transmission line

Attention: The PJM Board of Managers Mark Takahashi, Chairman and Manu Asthana, PJM President and CEO PJM Interconnection L.L.C. 2750 Monroe Boulevard Audubon, Pennsylvania 19408 I am strongly opposed to Project 262 of the 2024 Window 1 projects. For the reasons set forth below. I urge the PJM Board of Managers to reject PJM 2024 Window 1 Project 262. This project was not competitively bid or awarded. Incumbent utilities FirstEnergy, American Electric Power and Dominion made a joint proposal thwarting competition. The utilities did not have to compete with each other to propose a project that was cost effective for ratepayers and the project bid did not include any cost caps! Additionally, the project is under bid as it is based on Guyed V-lattice tower construction. Not only won't this work across most of the terrain, Guyed V-lattice towers are possibly the foulest, most land use restrictive, intensive and invasive electric infrastructure available! The Constructability and Financial Analysis of the project was not performed as required. The process for the analysis listed on PJM RTEP 2024 Window 1 Constructability Analysis Pg.16, required a review of land use mapping that identified residences within both 100 feet and 250 feet of the proposed line, along with identification of conservation easements, public land, and historic structures and districts in acres and the count as well as a Public Lands mapping review with types, acreage and counts (etc). PJM did not perform this analysis at all. The maps of the project indicate the project will be built on existing easements when PJM has stated that it will require a new easement 200' for its entire 261-mile length. The impacts of this proposal are being intentionally trivialized and glossed over. The proposed route crosses 15 miles of private property and conservation easements in Western Loudoun County that would be subject to eminent domain takings of 200' easements. Another @365 acres of private property to be taken to support data center expansion. This impacts the same area in Western Loudoun County that is the target of the new 500kV transmission line that was approved by PJM's Board of Managers in August of 2024 (Alternate MARL Re-Route) which is expected to take additional easements as well! Project 262 (similarly to Alternate MARL Re-Route) will cross Harpers Ferry National Park, the Appalachian Trail, and the C&O; Canal National Park and will destroy the scenic and historic value of these assets. This will be a third transmission tower even bigger than the other two - a 500kV plus a 500kV with a 138kV underbuild plus a 765kV Guyed V-lattice structure beside it! This will have a devastating effect on property owners all along the route and will render thousands of acres of property worthless!

Project 262 was rated the most risky project for its In-Service Date of 2029 due to both schedule and constructability risks. Project 262 is NOT the only solution for transmission nor is transmission the only solution for the data center expansion / projected energy load in Loudoun County, Virginia. Once again, I urge the PJM Board of Managers to reject PJM 2024 Window 1 Project 262 . Sincerely,

Jeff Chapman

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From: Laurie Jackman < >  
Sent: Thursday, January 30, 2025 10:24 AM  
To: Anders, David < >  
Subject: Opposition to Project 262 2024 Window 1 – (708) 765kV 261-mile transmission line

To the PJM Board of Managers;  
Mark Takahashi, Chairman and  
Manu Asthana, PJM President and CEO  
PJM Interconnection L.L.C.  
2750 Monroe Boulevard  
Audubon, Pennsylvania 19408

I am strongly opposed to Project 262 of the 2024 Window 1 projects. For the reasons set forth below. I urge the PJM Board of Managers to reject PJM 2024 Window 1 Project 262.

This project was not competitively bid or awarded. Incumbent utilities FirstEnergy, American Electric Power and Dominion made a joint proposal thwarting competition. The utilities did not have to compete with each other to propose a project that was cost effective for ratepayers and the project bid did not include any cost caps! Additionally, the project is under bid as it is based on Guyed V-lattice tower construction. Not only won't this work across most of the terrain, Guyed V-lattice towers are possibly the foulest, most land use restrictive, intensive and invasive electric infrastructure available!

The Constructability and Financial Analysis of the project was not performed as required. The process for the analysis listed on PJM RTEP 2024 Window 1 Constructability Analysis Pg.16, required a review of land use mapping that identified residences within both 100 feet and 250 feet of the proposed line, along with identification of conservation easements, public land, and historic structures and districts in acres and the count as well as a Public Lands mapping review with types, acreage and counts (etc). PJM did not perform this analysis at all. The maps of the project indicate the project will be built on existing easements when PJM has stated that it will require a new easement 200' for its entire 261-mile length.

The impacts of this proposal are being intentionally trivialized and glossed over. The proposed route crosses 15 miles of private property and conservation easements in Western Loudoun County that would be subject to eminent domain takings of 200' easements. Another @365 acres of private property to be taken to support data center expansion. This impacts the same area in Western Loudoun County

that is the target of the new 500kV transmission line that was approved by PJM's Board of Managers in August of 2024 (Alternate MARL Re-Route) which is expected to take additional easements as well!

Project 262 (similarly to Alternate MARL Re-Route) will cross Harpers Ferry National Park, the Appalachian Trail, and the C&O Canal National Park and will destroy the scenic and historic value of these assets.

This will be a third transmission tower even bigger than the other two - a 500kV plus a 500kV with a 138kV underbuild plus a 765kV Guyed V-lattice structure beside it! This will have a devastating effect on property owners all along the route and will render thousands of acres of property worthless!

Project 262 was rated the most risky project for its In-Service Date of 2029 due to both schedule and constructability risks. Project 262 is NOT the only solution for transmission nor is transmission the only solution for the data center expansion / projected energy load in Loudoun County, Virginia.

Once again, I urge the PJM Board of Managers to reject PJM 2024 Window 1 Project 262 .

Sincerely,

L. Jackman  
Lovettsville, VA

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Kimberly J. Carrick

New Freedom, PA

Mark Takahashi, Chairman  
Manu Asthana, PJM President and CEO  
PJM Interconnection L.L.C.  
2750 Monroe Boulevard  
Audubon, Pennsylvania 19408

Re: Project 262

Dear Mr. Takahashi and Mr. Asthana:

As a ratepayer in the PJM territory I am writing to voice my opposition to the proposed Project 262.

The citizens of West Virginia have sacrificed enough in the name of coal fired energy. Properties have already been taken from people in West Virginia to provide cheaper coal power to the "green" state of Virginia. A lot of this imported coal energy is to power data centers that make massive profits. In the case of Project 262 it is a huge, 261 mile long extension cord, traveling through 14 counties, crossing historic parks and landmarks.

This project will take even more properties and in some cases will cause the complete destruction of peoples' homes. The project will require new greenfield rights of way that will be 200 feet wide for 261 miles!

The ratepayers within PJM are already struggling with high electric bills. Please don't add the cost of this project to our bills.

Sincerely,

Kimberly J. Carrick

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**Nicholas Potts**  
Charles Town, WV

February 8, 2025

**The PJM Board of Managers**  
Mark Takahashi, Chairman and  
Manu Asthana, PJM President and CEO  
PJM Interconnection L.L.C.  
2750 Monroe Boulevard  
Audubon, Pennsylvania 19408  
Dear Mr. Takahashi & Mr. Asthana,

I am writing to you to speak out against the hastily and poorly planned Project 262. This is a 261 mile long 765kV transmission line project across West Virginia that has been put into motion without an understanding of the impact it will have on the populations of the areas that the line goes through. The maps that were used to have the project be approved are over fifteen years old from the first 'PATH' project. The areas that were rural farmland and woods in 2010 are now developments where people have purchased homes to settle down, and this project would cause devastating disruption to their lives.

Specifically, the areas that the route plans to run through Jefferson County, WV, are much more developed and it will be difficult to mitigate the property damage to run a transmission line through the currently identified route. It would be much easier to run the route to the data centers in Loudoun County by keeping the route in Virginia by building the transmission line along Route 7 in Virginia where it is less developed. If this additional electricity is being used to fuel the growth of the data center businesses in Virginia then Virginia needs to be the primary state the route is run through.

Yes, I am aware that PJM does not handle the exact determination of the location of the transmission line, but the project was approved with the general idea of the route laid out by PJM to follow the previously abandoned project. I would like to close with a question. If the previous project failed, largely due to people pushing back against it, why would you try to renew the project with the same route? I implore you to please reject Project 262, and find another solution that does not destroy Jefferson County.

Sincerely,  
Nicholas Potts

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February 11, 2024

The PJM Board of Managers  
Mark Takahashi, Chairman and  
Manu Asthana, PJM President and CEO  
PJM Interconnection L.L.C.  
2750 Monroe Boulevard  
Audubon, Pennsylvania 19408

RE: Opposition to Project 262 2024 Window 1 – (#708) 765kV 261-mile transmission line

I am strongly opposed to Project 262 of the 2024 Window 1 projects and urge the PJM Board of Managers **to reject** PJM 2024 Window 1 Project 262.

The impacts of this proposal are intentionally understated.

The 200ft easement for the 765kv line is a new greenfield easement for the entire 261 miles. The maps of the project indicate that segments of the project will be built on existing easements when **the redacted proposal states that it will require a new 200' easement for its entire 261-mile length** .

A new 765kV Transmission line will not fit in the existing ROW anywhere along its length. The map should show a "green" line for the entire length marking half "pink" is a gross misrepresentation of the land acquisition and property impact!

The Constructability and Financial Analysis of the project was not performed. The process for the analysis listed on PJM RTEP 2024 Window 1 Constructability Analysis Pg.16, required a review of land use mapping that identified the count of residences within 100 feet and 250 feet of the proposed line, along with identification of conservation easements (acres) , public land (acres and count) , and historic structures and districts and archeological sites as well as a Public Lands mapping review with types, acreage and counts (etc). **PJM did not perform the required "desktop" analysis at all.**

**Project 262(Proposal 708) will take at least 6,352 acres of land** from rural property owners across 14 West Virginia counties, 3 Virginia counties and 1 Maryland county. Homes and farms will be taken and lives destroyed. Project 262 (Proposal 708) will also impact 32 conservation easements. It crosses the Monongahela National Forest, Appalachian National Scenic Trail, Chesapeake & Ohio Canal National Historical Park, Harpers Ferry National Historical Park, Potomac Heritage National Scenic Trail and it will run parallel down the view shed of the Potomac River. Project 262 will destroy the scenic and historic value of these parks - all of which are also impacted by the 500kv line that was approved in August of 2024.

**Also not mentioned in the risk analysis is the complexities of simultaneously siting and building a 500kv line with an in-service date of 2032 and the proposed 765kv of Project 262 (Proposal 708) with an in-service date of 2029 in the same corridor through Jefferson County, WVA and Loudoun County, Virginia.**

Project 262 (708) is being proposed to go through the exact same area in Jefferson County, WVA and Loudoun County, Virginia where PJM approved a 500kv line just in August of 2024. **This will be a third transmission tower even bigger than the other two - a 500kV plus a the new 500kV that has not been constructed with a 138kV under built plus a 765kV Guyed V-lattice structure beside it!** Even worse is the use of **guyed V-lattice tower construction - this takes up the most land and is the most land use restrictive structure that could possibly be used.**

Project 262 will have a devastating effect on property owners all along the route. Homes that are not demolished outright will be seriously devalued and thousands of acres of property will be made worthless! In Loudoun alone 365 acres is impacted by just Project 262.

I grew up in western Loudoun County, my parents home is in the path of this transmission line. It's not just their home that could be taken, this is a rural family subdivision. My grandparents subdivided their property for their children and grandchildren and my great-aunt has an adjacent lot. There are multiple family homes, my Aunt and Uncle's house as well as my Grandparent's home already exist and there are lots for my generation. This is three generations, no matter whose property is taken by eminent domain and forced to host these lines we will all be devastated.

Neither First Energy, Dominion nor Transource have any experience building a 765kV transmission line. The ONLY utility with any experience building a 765kV line is AEP (American Electric Power) the parent company of Transource.

Even with all the missing analysis and understated risk. Project 262 was rated the most risky project for its In-Service Date of 2029 due to both schedule and constructability risks.

***Project 262 is NOT the only solution for transmission nor is transmission the only solution for the data center expansion / projected energy load in Loudoun County, Virginia.***

Once again, I urge the PJM Board of Managers to **reject** PJM 2024 Window 1 Project 262 . **Do NOT approve** Project 262.

Sincerely,

Jaime Ghiorzi

Philidelphia, PA

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February 12, 2025

The PJM Board of Managers  
Mark Takahashi, Chairman and  
Manu Asthana, PJM President and CEO  
PJM Interconnection L.L.C.  
2750 Monroe Boulevard  
Audubon, Pennsylvania 19408

RE: Opposition to Project 262 2024 Window 1 – (#708) 765kV 261-mile transmission line

We are strongly opposed to Project 262 in the recommended 2024 Window 1 Projects. This proposal for a two hundred and sixty one (261) mile overhead 765 kV line, with an accompanying two hundred foot (200) easement, across fourteen counties in West Virginia, three counties in Virginia and one county in Maryland is preposterous and outrageous on its face. A family's home is usually their greatest financial investment. Placing a 130 - 140 foot guyed V-lattice tower on someone's land or over their land will render that land worthless. The anguish and fear of financial loss to hundreds of people across the tri-state area cannot be measured in dollars and cents. This proposal is nothing more than sheer greed.

We urge the PJM Board of Managers to reject PJM 2024 Window 1 Project 262 for the reasons stated below:

1. The project was not competitively bid, the proposal is a "joint" proposal by a cartel of three incumbent transmission owners whom did not form a separate entity to bid the solution. Project 262 2024 Window 1 – (#708) 765kV 261-mile transmission line was underbid, there is no way it will be permitted to be built with guyed-wires and V-lattice structure. The independent cost estimate \$2,288.97M includes a contingency of 30%. The estimate of the incumbent cartel \$1,944.99M is \$343.98M below the independent estimate. That is 17% less than the independent estimate to state this is "within 11 - 20%" of the independent estimate is a stretch considering there are no cost caps.

The assessment that the cost estimate on a \$1,944.99M project being under bid by 17%, as compared to the independent estimate being considered "low to medium" risk is ludicrous. This estimate doesn't even account for inflation!

The proposed in-service date of December 2029 is considered "aggressive" (constructibility analysis pg 28). That is a bit understated considering PJM just approved a 500kV line in this same corridor in August of 2024 and slipped the in-service date for that transmission line (Alternate MARL Reroute) to 2032. Now we are being told a 765kV transmission line can be built concurrently in that same corridor by 2029 and it is only a "medium-high" schedule risk?

This project will not meet the 2029 in-service date which was specified as part of the 2024 Window 1 solution requirements, PJM is already projecting a 3 year slip before the project is even approved.

*These companies are already queuing up a "scope change" for a 20% cost increase with a 3 year schedule slip.*

2. None of the incumbent utilities that submitted the joint proposal have ANY experience building a 765kV transmission line. Neither FirstEnergy, Dominion nor Transource have ever built a 765kv transmission line. The ONLY utility with any experience building a 765kV line is AEP (American Electric Power), the parent company of Transource. The risk assessment statement on pg 24 states:

"FirstEnergy, including its participation in the joint venture, has significant experience with the proposed equipment and the capabilities to construct Proposal 708 as submitted. *The proposing entity experience and capability risk is considered low.*"

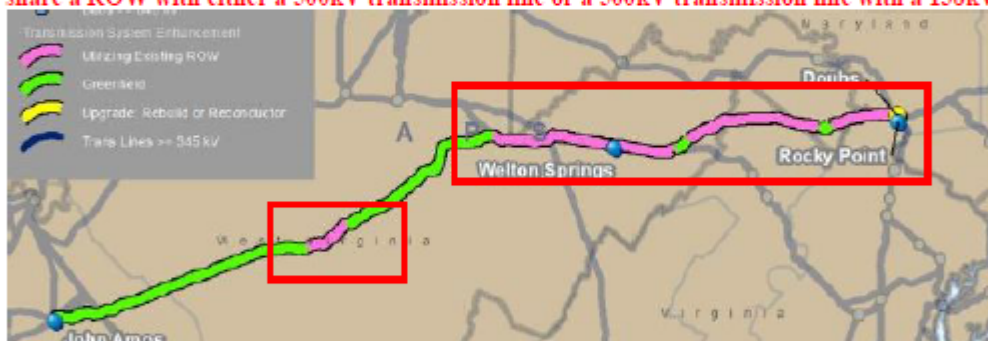
**The proposing entity experience and capability risk assessment as stated is totally and completely false. These companies have ZERO experience building a 765kV transmission line that makes for a HIGH risk.**

3. The risk analysis fails to mention that the exact same communities in Jefferson County, West Virginia and Loudoun County Virginia are impacted by a 500kv transmission line (Alternate MARL Re-route) approved by the PJM Board in August of 2024.

**Transource, Dominion and First Energy would be simultaneously siting and building a 500kv line with an in-service date of 2032 and the proposed 765kv of Project 262 with an in-service date of 2029 in the same corridor through Jefferson County, WVA and Loudoun County, Virginia.**

This would be a third transmission tower even bigger than the other two - a 500kV plus a the new 500kV that has not been constructed with a 138kV under built plus a 765kV guyed V-lattice structure beside it!

4. **The impacts of this proposal are intentionally and grossly understated. The redacted proposal for Proposal 708 of Project 262 explicitly states it requires a new 200' easement for its entire 261-mile length.** The Constructability Analysis fails to mention a new 200' easement is required for the entire 261 mile length of the transmission line. The PJM TEAC charts and Constructability Analysis map should show a "green" line for the entire length of the transmission line. The "pink" segment implying utilization of the existing ROW is a gross misrepresentation of the land acquisition and property impact. A 765kV transmission line cannot share a ROW with either a 500kV transmission line or a 500kV transmission line with a 138kV under built.



5. **A Constructability and Financial Analysis of the project was not performed - there is nothing in the analysis that would indicate a desktop review was conducted as required.** The constructability analysis appears to have been cut and pasted from the redacted proposal - with the exception of the part about needing a new 200' easement. PJM failed to do any analysis on Land-Use impacts. They did not even bother identifying the number of residences or lots impacted.

The process for the analysis listed on PJM RTEP 2024 Window 1 Constructability Analysis Pg.16 states:

" (a) **Conduct a desktop review** to identify significant barriers that might add additional risk to the project, and determine whether the proposed project area (a study area that is defined for each project) can support the economical construction of the electric transmission and/or substation facilities.

The following target information will be referenced by as required and as allowable by available public data sources:

- National Wetland Inventory mapping from United States Fish and Wildlife Service (USFWS), which will include counts and acreages of:
  - Total Non-Tidal Wetlands
  - Wetlands of Special State Concern
  - Subaqueous Lands
  - Total Wetlands
  - Non-Tidal (Non-Forested) Wetlands
  - Non-Tidal (Forested) Wetlands
- Mapping of specially designated wetlands, streams or rivers, which will include:
  - Non-Tidal Waterbodies (Count/Acres)
  - 100-Year Flood Plain (Acres)
  - Watershed Boundaries (Count)
  - Outstanding and Exceptional Waters (Count)
  - Wild and Scenic Rivers (Count)
  - United States Geologic Survey Blue Line Streams (Count)
- United States Department of Agriculture(USDA)/The Natural Resources Conservation Service (NRCS) Land Cover mapping, which will include acreages of:
  - Sub-Aquatic Vegetation
  - Forested Uplands
  - Unforested Uplands
  - Agricultural Lands
- Land-Use mapping, which will include:
  - Residences within 100 feet (Count)
  - Residences within 250 feet (Count)
  - Land Zoned Conservation (Acres)
  - Rural Legacy (Acres)
  - Program Open Space (Acres)
  - Private Conservation Easements (Acres & Count)
  - Public Land (Acres & Count)
  - Parcels Crossed (Count)
  - Green Infrastructure/Green Acres program (Acres)
  - National Estuarine Research Reserve Project Areas (Acres & Count)
  - Natural Heritage Areas (Acres & Count)
  - Environmental Trust Easements (Acres & Count)
  - Forest Legacy Easements (Acres & Count)
  - Tidelands
- Public Lands mapping review, which will include the types, counts and acreages of the following:
  - State/National Forests
  - Natural Areas
  - Preserves
  - Game Lands
  - Recreation Areas
- Cultural Resources mapping review, including the count of previously identified resources, which will include the types, counts, and acreages of the following:
  - Listed and Eligible Historic Structures
  - Listed and Eligible Historic Districts
  - Listed and Eligible Archeological Sites
- Aquatic Resource mapping, including the count of Submerged Historic Resources (if applicable)



- Online distribution data of rare, threatened and endangered species within a 0.5- mile radius of the study area

Project 262 will take at least 6,352 acres of land from rural property owners across 14 West Virginia counties, 3 Virginia counties and 1 Maryland county. Homes and farms will be taken and lives destroyed.

Project 262 will also impact 32 conservation easements.

Project 262 crosses the Monongahela National Forest, Appalachian National Scenic Trail, Chesapeake & Ohio Canal National Historical Park, Harpers Ferry National Historical Park, Potomac Heritage National Scenic Trail and it will run parallel down the view shed of the Potomac River. Project 262 will destroy the scenic and historic value of these assets. ALL of these parks and scenic areas are also impacted by the 500kv line that was approved in August of 2024, this will significantly decrease the enjoyment of the visitors to these sites.

In terms of land use the risk analysis fails to mention that the exact same communities in Jefferson County, West Virginia and Loudoun County Virginia are already being impacted by a 500kv transmission line (Alt MARL Re-route) approved by the PJM Board in August of 2024

Project 262 will have a devastating effect on property owners all along the route. Homes that are not demolished outright will be seriously devalued and thousands of acres of property will be made worthless! In Loudoun alone, 365 acres would be impacted by Project 262 - Proposal 708.

Again, for these communities in Jefferson County West Virginia and Loudoun County Virginia, this will be a third transmission tower even bigger than the other two - a 500kV plus a the new 500kV that has not been constructed with a 138kV under built plus a 765kV guyed V-lattice structure beside it! Even worse is the use of guyed V-lattice tower construction - this takes up the most land and is the most land use restrictive structure that could possibly be used.

6. There is NO NIETC transmission corridor here. In fact, the Mid-Atlantic Transmission corridor encompassed MULTIPLE paths not just one and all of it was CANCELED.

### Mid-Atlantic



Western Loudoun County is a scenic rural area along the Potomac River, mostly farmland, rural homes, orchards and gardens. Our properties are in the path of these transmission lines - our house, the homes of two

of my children and their families, multiple lots with wells and septic for our grandchildren as well as the property of our sister/sister-in-law. This is a rural family subdivision which could very well be destroyed. This is three generations, no matter whose property is taken by eminent domain and forced to host these lines we will all be devastated.

On page 148 is the constructability review of a 230kV transmission line 4 miles greenfield overhead and 4 miles greenfield underground, this line is characterized as having "difficulties due to historical county government opposition and land owner opposition" and has a "high" constructability risk.

Compare that "high risk" to Project 262 - Proposal 708 on page 23:

**Constructability Summary**

The proposal is a long set of lines crossing multiple states and has its fair share of tricky areas as any project this ambitious would. The Welton Springs to Rocky Point line segment crosses national parks like the Appalachian Trail, Harpers Ferry and the C&O Canal. PJM anticipates that permitting and land acquisition will be notable risks for this project. A high risk was assessed for constructability.

Project 262 - Proposal 708 is a "high" constructability risk because "it has its fair share of tricky areas"?

What is the technical definition of "tricky" we're not familiar with that term?

This is "tricky":

- a 765kV transmission line with guyed wire V-lattice structures,
- needing new 261 mile 200' greenfield easement
- across 14 counties in West VA, 3 Counties in VA across the Potomac River and into Frederick County, Maryland,
- along the same corridor as the PATH transmission line which was denied in 2012 due to landowner opposition
- the SECOND HVAC transmission line to be proposed inside of 6 months across two of those counties
- to be built con-currently as the 500kV transmission line with a 138kV under build
- across 32 conservation easements and 6 national and state parks
- by a cartel of three incumbent transmission owners none of whom have ever built a 765kV transmission line

Talk about an understatement! *This is not a constructability analysis: it is intentionally devoid of content and slanted to promote the preferred project of incumbent transmission owners.*

Even with all the missing analysis and understated risk. Project 262, was rated the most risky project for its In-Service Date of 2029 due to both schedule and constructability risks.

*Project 262 is NOT the only solution for transmission nor is transmission the only solution for the data center expansion / projected energy load in Loudoun County, Virginia.*

Once again, we urge the PJM Board of Managers to reject PJM 2024 Window 1 Project 262 . Do NOT approve Project 262.

Sincerely,

Alfred and Irene Ghiorzi

Lovettville, VA

February 5, 2024  
The PJM Board of Managers  
Mark Takahashi, Chairman and  
Manu Asthana, PJM President and CEO  
PJM Interconnection L.L.C.  
2750 Monroe Boulevard  
Audubon, Pennsylvania 19408

RE: Opposition to Project 262 2024 Window 1 – (#708) 765kV 261-mile transmission line

I am strongly opposed to Project 262 of the 2024 Window 1 projects and urge the PJM Board of Managers **to reject** PJM 2024 Window 1 Project 262.

Project 262 (708) will have a major destructive impact on my family and my home. My home is in western Loudoun County, Virginia. This area is rural, much of it is farms. There are conservation and open space easements along the Potomac River. My grandparents subdivided their land for their children and grandchildren. There are multiple family homes already and lots for my generation. Three generations will be impacted. These are our homes, orchards, berry patches, mature trees, landscaping, barns and sheds. No matter whose property is taken by eminent domain and forced to host these lines this will be devastating for us all.

The impact of Project 262's 765kV 261 miles of guyed V-lattice towers is grossly understated and intentionally misleading. **The redacted proposal states that Proposal 708 of Project 262 will require a new 200' easement for its entire 261-mile length.** The maps of the project indicate that segments of the project will be built on existing easements. A new 765kv Transmission line will not fit in the existing ROW. The map is a gross misrepresentation of the land acquisition and property impact. Nowhere in the constructability analysis does it clearly state that a new 200' easement is required.

PJM RTEP 2024 Window 1 Constructability Analysis, identifies the process for the analysis on Pg.16 . It required a review of land use mapping that identified the count of residences within 100 feet and 250 feet of the proposed line, along with identification of conservation easements (acres) , public land (acres and count) , and historic structures and districts and archeological sites as well as a Public Lands mapping review with types, acreage and counts (etc). **PJM did not perform the required "desktop" analysis. Proposal 708 of Project 262 will take least 6,352 acres of land** for its easements - across 14 West Virginia counties, 3 Virginia counties and 1 Maryland county. This is going to destroy hundreds of acres of private property as well as taking homes, this will be 'life' destroying for many families. Project 262 will also impact 32 conservation easements. It crosses the Monongahela National Forest, Appalachian National Scenic Trail, Chesapeake & Ohio Canal National Historical Park, Harpers Ferry National Historical Park, Potomac Heritage National Scenic Trail and it will run parallel down the view shed of the Potomac River.

This project will destroy homes and seriously devalue properties all along the route. The construction will destroy thousands of acres of property, much of it farmland will be worthless. How do you farm around guyed wires, how do you place a house or outbuildings? Who wants to live under or beside two 500kv lines a 138kV transmission line and a 765kV transmission line? The cumulative health effects of living near and under these lines has never been studied. In Loudoun alone 365 acres is impacted by just Project 262.

**The risk analysis does not mention that Project 262 (708) is being proposed to go along the exact same corridor in Jefferson County, WVA and Loudoun County, Virginia where PJM approved a 500kv line just in August of 2024. Has any transmission company simultaneously sited and built a 500kv line and a 765kV guyed-wire line along the same corridor?**

The not yet built 500kv has an in-service date of 2032 and the proposed 765kv of Project 262 has an in-service date of 2029. How can a 765kV transmission line in the same corridor through Jefferson County, WVA and Loudoun County, Virginia be built three years earlier than the 500kV transmission line whose schedule slipped from 2029 to 2032 in August of 2024?

**This will be a third transmission tower even bigger than the other two - a 500kV plus a the new 500kV that has not been constructed with a 138kV under built plus a 765kV Guyed V-lattice structure beside it! Even worse is the use of guyed V-lattice tower construction - this takes up the most land and is the most land use restrictive structure that could possibly be used.**

Neither First Energy, Dominion nor Transource have any experience building a 765kV transmission line. The ONLY utility with any experience building a 765kV line is AEP (American Electric Power) the parent company of Transource.

Even with all the missing analysis and understated risk. Project 262 was rated the most risky project for its In-Service Date of 2029 due to both schedule and constructability risks.

***Project 262 is NOT the only solution for transmission nor is transmission the only solution for the data center expansion / projected energy load in Loudoun County, Virginia.***

Once again, I urge the PJM Board of Managers to **reject** PJM 2024 Window 1 Project 262 . **Do NOT approve** Project 262.

Sincerely,  
Julianne Ghiorzi  
Norfolk, VA

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February 12, 2025

The PJM Board of Managers  
Mark Takahashi, Chairman and  
Manu Asthana, PJM President and CEO  
PJM Interconnection L.L.C.  
2750 Monroe Boulevard  
Audubon, Pennsylvania 19408

RE: Opposition to Project 262 2024 Window 1 – (#708) 765kV 261-mile transmission line

We stand together in staunch opposition to Project 262 of the recommended 2024 Window 1 Projects, particularly Proposal #708 the 765kV 261-mile transmission line from John Amos to a new substation in Frederick Maryland. We urge the PJM Board of Managers to reject PJM 2024 Window 1 Project 262 for the reasons stated below:

1. Project 262 was not competitively bid

Project 262 is a joint proposal by three incumbent transmission owners whom did not form a separate entity to bid the solution. This was anti-competitive as they did not have to bid against one another. Project 262 is the product of three incumbent transmission owners, the bid was not competitive bid and there are no cost caps.

2. The cost estimate is under bid and the assessment that the cost escalation risk is "low to medium" is not sound

The cartel's bid of \$1.94B is \$343.98M below the independent cost estimate of \$2.29B which indicates to us that the project was underbid by roughly 17% to start with.

The PATH transmission line that was defeated in 2012 was approximately \$1.9B. MISO has a transmission cost estimation guide<sup>1</sup> which has historically escalated costs year over year at a rate of 2.5%, in 2024 an escalation rate of 5.0% was used to escalate from 2023 to 2024 dollars.

Our calculation, based on PATH's 2012 cost, using MISO's transmission cost estimate guide for the ensuing 13 years, suggests that the cost of this proposal is closer to \$2.55B.

The most likely cost of Project 262, is roughly 31% more than these companies bid which is more expensive than the upper limit of the independent estimate that had a 30% buffer. Since there are no cost caps the sky is the limit, cost increases will just be submitted under a rate case and rubber stamped as usual.

The assessment that the cost estimate is a "low to medium" risk is a gross misrepresentation of the potential for this project's costs to escalate precipitously. This project's cost has no upper limit its cost risk is HIGH. A significant factor in the cost escalation is the use of an unacceptable "cheaper" guyed wire and V-lattice structure that will not work over most of the terrain, nor will it be permitted through residential or rural communities.

*Three incumbent transmission owners wrote themselves a blank check to build this project.*

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<sup>1</sup> MISO Transmission Cost Estimate Guide Available here:  
<https://cdn.misoenergy.org/20240131%20PSC%20Item%2005%20Transmission%20Cost%20Estimation%20Guide%20for%20MTEP%2024631525.pdf>



3. The constructability analysis (pg 28) states the in-service date of December 2029 is considered "aggressive", when in fact there is no way this transmission line can be built by 2029.

In August of 2024 the PJM Board of Managers approved a "scope change" to 500kV transmission line (Alternate MARL Re-Route) which shifted the route of the project and also caused the InService date of 2029 to slip three years to 2032. The Alternate MARL Re-Route is in the same corridor as Project 262.

**Now we are being told building a 765kV transmission line concurrently in that same corridor by 2029 is only a "medium-high" schedule risk but a 500kV transmission line that was approved 6 months ago cannot be completed until three years later in 2032?**

**This project will not meet the 2029 in-service date which was specified as part of the 2024 Window 1 solution requirements.** Project 262 does not have a chance of being completed by 2029. At best, this project has 3 year slip to at least 2032 even before the project is even approved.

4. None of the incumbent utilities that submitted the joint proposal have ANY experience building a 765kV transmission line.

Neither FirstEnergy, Dominion nor Transource have ever built a 765kv transmission line. The ONLY utility with any experience building a 765kV line is AEP (American Electric Power), the parent company of Transource. The risk assessment statement on pg 24 states:

*"FirstEnergy, including its participation in the joint venture, has significant experience with the proposed equipment and the capabilities to construct Proposal 708 as submitted. The proposing entity experience and capability risk is considered low."*

**The proposing entity experience and capability risk assessment as stated is totally and completely false. These companies have ZERO experience building a 765kV transmission line. That makes for a proposing entity and capability of HIGH, not low.**

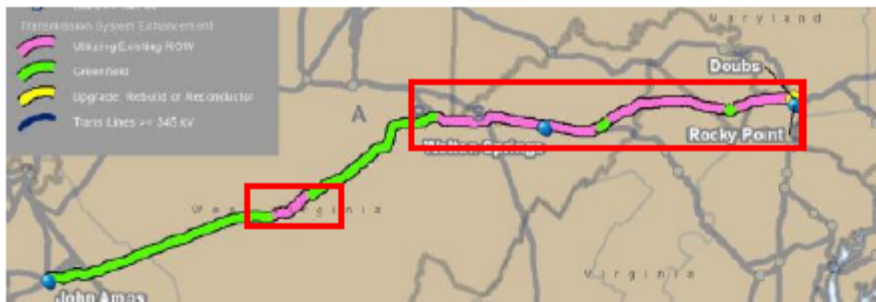
5. The risk analysis fails to mention that the exact same communities in Jefferson County, West Virginia and Loudoun County, Virginia are impacted by a 500kv transmission line (Alternate MARL Re-route) approved by the PJM Board in August of 2024.

**Transource, Dominion and First Energy would be simultaneously siting and building a 500kv line with an in-service date of 2032 and the proposed 765kv of Project 262 with an in-service date of 2029 in the same corridor through Jefferson County, WVA and Loudoun County, Virginia.**

6. The property impacts of this proposal are intentionally and grossly understated.

The redacted proposal for Proposal 708 of Project 262 explicitly states it requires a new 200' easement for its entire 261 mile length. Yet, the Constructability Analysis fails to mention a new 200' easement is required for the entire 261 mile length of the transmission line.

The PJM TEAC charts and Constructability Analysis map should show a "green" line indicating Greenfield, for the entire length of the transmission line. **The "pink" segment implying utilization of the existing ROW is a gross misrepresentation of the land acquisition and property impact. A 765kV transmission line cannot share a ROW with either a 500kV transmission line or a 500kV transmission line with a 138kV under built.**



7. A Constructability and Financial Analysis of the project was not performed - there is nothing in the analysis that would indicate a desktop review was conducted as required .

The process for the analysis listed on PJM RTEP 2024 Window 1 Constructability Analysis Pg.16 states:

" (a) Conduct a desktop review to identify significant barriers that might add additional risk to the project, and determine whether the proposed project area (a study area that is defined for each project) can support the economical construction of the electric transmission and/or substation facilities.

The following target information will be referenced by as required and as allowable by available public data sources:

- National Wetland Inventory mapping from United States Fish and Wildlife Service (USFWS), which will include counts and acreages of:
  - Total Non-Tidal Wetlands
  - Wetlands of Special State Concern
  - Subaqueous Lands
  - Total Wetlands
  - Non-Tidal (Non-Forested) Wetlands
  - Non-Tidal (Forested) Wetlands
- Mapping of specially designated wetlands, streams or rivers, which will include:
  - Non-Tidal Waterbodies (Count/Acres)
  - 100-Year Flood Plain (Acres)
  - Watershed Boundaries (Count)
  - Outstanding and Exceptional Waters (Count)
  - Wild and Scenic Rivers (Count)
  - United States Geologic Survey Blue Line Streams (Count)
- United States Department of Agriculture(USDA)/The Natural Resources Conservation Service (NRCS) Land Cover mapping, which will include acreages of:
  - Sub-Aquatic Vegetation
  - Forested Uplands
  - Unforested Uplands
  - Agricultural Lands
- Land-Use mapping, which will include:
  - Residences within 100 feet (Count)
  - Residences within 250 feet (Count)
  - Land Zoned Conservation (Acres)
  - Rural Legacy (Acres)
  - Program Open Space (Acres)
  - Private Conservation Easements (Acres & Count)

- Public Land (Acres & Count)
- Parcels Crossed (Count)
- Green Infrastructure/Green Acres program (Acres)
- National Estuarine Research Reserve Project Areas (Acres & Count)
- Natural Heritage Areas (Acres & Count)
- Environmental Trust Easements (Acres & Count)
- Forest Legacy Easements (Acres & Count)
- Tidelands

- Public Lands mapping review, which will include the types, counts and acreages of the following:
  - State/National Forests
  - Natural Areas
  - Preserves
  - Game Lands
  - Recreation Areas
- Cultural Resources mapping review, including the count of previously identified resources, which will include the types, counts, and acreages of the following:
  - Listed and Eligible Historic Structures
  - Listed and Eligible Historic Districts
  - Listed and Eligible Archeological Sites
- Aquatic Resource mapping, including the count of Submerged Historic Resources (if applicable)
- Online distribution data of rare, threatened and endangered species within a 0.5- mile radius of the study area

Project 262 will impact 32 conservation easements. Plus, Project 262 crosses the Monongahela National Forest, Appalachian National Scenic Trail, Chesapeake & Ohio Canal National Historical Park, Harpers Ferry National Historical Park, Potomac Heritage National Scenic Trail and it will run parallel down the view shed of the Potomac River. Project 262 will destroy the scenic and historic value of these assets. *ALL of these parks and scenic areas would also be impacted by the 500kv line that was approved by the PJM BOM in August of 2024, this will significantly decrease the enjoyment of the visitors to these sites.*

Project 262 will take at least 6,352 acres of land from rural property owners across 14 West Virginia counties, 3 Virginia counties and 1 Maryland county. Homes that are not demolished outright will be seriously devalued and thousands of acres of property will be made worthless! This will destroy lives and lifetime investments. Project 262 will have a devastating effect on property owners all along the route. In Loudoun County, 365 acres would be impacted by Project 262 - Proposal 708.

The risk analysis fails to mention that the exact same communities in Jefferson County, West Virginia and Loudoun County Virginia will be impacted by the 500kv transmission line (Alt MARL Re-route) approved by the PJM BOM in August of 2024. This would be a third transmission tower even bigger than the other two - a 500kV plus a the new 500kV that has not been constructed with a 138kV under built plus a 765kV guyed V-lattice structure beside it! The use of guyed V-lattice tower construction is not acceptable and the transmission line will not be permitted with this configuration. A guyed V-lattice tower takes up the most land and is the most land use restrictive structure that could possibly be used.

*Are there any other locations in PJM that have two 500kV transmission lines plus a 138kV and a 765 kV transmission line in the same corridor?*

8. The Mid-Atlantic Transmission corridor encompassed MULTIPLE paths not just the Mt Storm - Doubs corridor and all of it was entirely CANCELED. So the "preference" that is being given to projects in an NIETC corridor is baseless.



The constructability summary (pg 23) for Project 262 Proposal #708 is vacuous and totally lacking in any meaningful insight.

#### Constructability Summary

The proposal is a long set of lines crossing multiple states and has its fair share of tricky areas as any project this ambitious would. The Welton Springs to Rocky Point line segment crosses national parks like the Appalachian Trail, Harpers Ferry and the C&O Canal. PJM anticipates that permitting and land acquisition will be notable risks for this project. A high risk was assessed for constructability.

Project 262 - Proposal 708 is a "high" constructability risk because "it has its fair share of tricky areas"? "Tricky" are you kidding me?

A cartel of three incumbent transmission owners none of whom have ever built a 765kV transmission line is going to build a 261 mile, 765kV transmission line with guyed wire V-lattice structures, in a new 261 mile 200' greenfield easement, across 14 counties in West VA, 3 Counties in VA across the Potomac River and into Frederick County, Maryland. This is the SECOND HVAC transmission line to be proposed inside of 6 months across two of those counties and along the same corridor as the PATH transmission line which was denied in 2012 due to landowner opposition. "Historical landowner opposition" is sufficient enough of a reason to reject other proposals, and somehow the historical opposition to the PATH transmission line plus the double whammy of a 500kV plus a 765kV somehow isn't going to incite sufficient landowner opposition to rule out this project? Expecting the project to get all the necessary permits to across 32 conservation easements and 6 national and state parks seems farfetched. seriously, you expect three companies with no experience building a 765kV transmission line will complete it three years sooner then the 500kV transmission line with a 138kV under build that was approved in August of 2024.

*This is not a constructability analysis it is pure propaganda, it is intentionally devoid of content and slanted to promote the preferred project of incumbent transmission owners.*

We live in Western Loudoun by the Potomac River. Our home and property is in the path of these transmission lines. It is not just our home that would be impacted as we live in a rural family subdivision. Our house, my parents house, the home of my brother and his family as well as two lots with wells and septic for the next generation and the property of our Aunt will be impacted. Land and homes are a major financial investment and this could very well destroy three generations of our family's financial wealth. No matter whose property is taken by eminent domain and forced to host these lines we will all be devastated.

*Project 262 is NOT the only solution for transmission nor is transmission the only solution for the data center expansion / projected energy load in Loudoun County, Virginia. Project 262 is a boondoggle and a money pit.*

Once again, we urge the PJM Board of Managers to reject PJM 2024 Window 1 Project 262 . Do NOT approve Project 262.

Sincerely,

Dr. Thomas Ghiorzi &  
Dr. Joyce Ghiorzi

[Redacted]  
Lovettsville, VA [Redacted]

February 14, 2025

The PJM Board of Managers  
Mark Takahashi, Chairman and  
Manu Asthana, PJM President and CEO  
PJM Interconnection L.L.C.  
2750 Monroe Boulevard  
Audubon, Pennsylvania 19408

RE: Opposition to Project 262 2024 Window 1 – (#708) 765kV 261-mile transmission line

We are strongly opposed to Project 262 (Proposal 708) of the 2024 Window 1 projects and urge the PJM Board of Managers to reject PJM 2024 Window 1 Project 262 .

The impacts of this project, especially Proposal #708 , are ridiculously incomplete and totally out of touch with reality. The intent appears to be to deceive the Board by intentionally minimizing the impact this will have on the communities it traverses. The documents contradict themselves . The redacted proposal states that the transmission line will require a new 200' easement for its entire 261-mile length. However, the map implies over half will utilize the existing ROW. The map should show a "greenfield" line for the entire length. Any implication that the existing ROW can be used is not only intentionally misleading but also a flagrant misrepresentation of the land acquisition and property impact to landowners along the route.

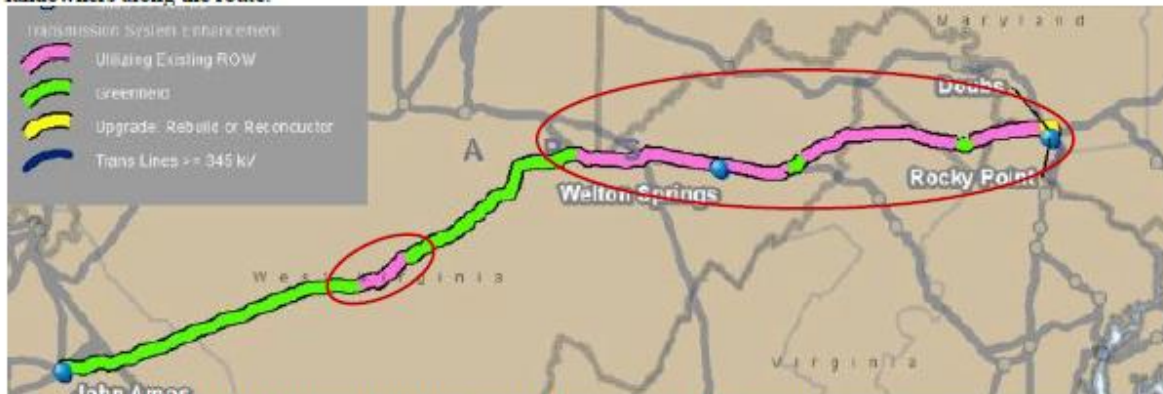


Figure 1: 12/03/2024 PJM TEAC Reliability Update Item 11 pg 78 Proposal

There is NO WAY a 765kV transmission line will fit within the existing ROW. The existing ROW contains a 500kV transmission in a 200' easement and a 138kV in a 100' easement. A 765kV line on guyed wire V-Lattice is not going to fit adjacent to the row either. Between the new developments and the roads there is no space left for "parallel" easements without taking out homes. *This is a new 200' greenfield easement through 14 West Virginia counties, 3 Virginia counties and 1 Maryland county, multiple conservation easements and both state and federal parks. Any representation to the contrary is deceptive propaganda.*

PJM did not perform the desktop review required by their own process for the analysis which is described in PJM RTEP 2024 Window 1 Constructability Analysis on Pg.16 and 17.

" (a) **Conduct a desktop review** to identify significant barriers that might add additional risk to the project, and determine whether the proposed project area (a study area that is defined for each project) can support the economical construction of the electric transmission and/or substation facilities.

The following target information will be referenced by as required and as allowable by available public data sources:

- National Wetland Inventory mapping from United States Fish and Wildlife Service (USFWS), which will **include counts and acreages** of:
  - Total Non-Tidal Wetlands
  - Wetlands of Special State Concern
  - Subaqueous Lands
  - Total Wetlands
  - Non-Tidal (Non-Forested) Wetlands
  - Non-Tidal (Forested) Wetlands
- Mapping of specially designated wetlands, streams or rivers, which will include:
  - Non-Tidal Waterbodies (**Count/Acres**)
  - 100-Year Flood Plain (**Acres**)
  - Watershed Boundaries (**Count**)
  - Outstanding and Exceptional Waters (**Count**)
  - Wild and Scenic Rivers (**Count**)
  - United States Geologic Survey Blue Line Streams (**Count**)
- United States Department of Agriculture(USDA)/The Natural Resources Conservation Service (NRCS) Land Cover mapping, which will **include acreages** of:
  - Sub-Aquatic Vegetation
  - Forested Uplands
  - Unforested Uplands
  - Agricultural Lands
- Land-Use mapping, which will include:
  - **Residences within 100 feet (Count)**
  - **Residences within 250 feet (Count)**
  - **Land Zoned Conservation (Acres)**
  - **Rural Legacy (Acres)**
  - **Program Open Space (Acres)**
  - **Private Conservation Easements (Acres & Count)**
  - **Public Land (Acres & Count)**
  - **Parcels Crossed (Count)**
  - **Green Infrastructure/Green Acres program (Acres)**
  - **National Estuarine Research Reserve Project Areas (Acres & Count)**
  - **Natural Heritage Areas (Acres & Count)**
  - **Environmental Trust Easements (Acres & Count)**
  - **Forest Legacy Easements (Acres & Count)**
  - **Tidelands**
- Public Lands mapping review, which will include the types, counts and acreages of the following:
  - State/National Forests
  - Natural Areas
  - Preserves
  - Game Lands
  - Recreation Areas
- Cultural Resources mapping review, including the count of previously identified resources, which will include the types, counts, and acreages of the following:
  - Listed and Eligible Historic Structures
  - Listed and Eligible Historic Districts
  - Listed and Eligible Archeological Sites



- Aquatic Resource mapping, including the count of Submerged Historic Resources (if applicable)
- Online distribution data of rare, threatened and endangered species within a 0.5- mile radius of the study area"

Project 262 (Proposal 708) will take at least 6,352 acres of land. This will have grievous impacts on rural property owners and rural towns. Project 262 (Proposal 708) would cross 14 West Virginia counties, 3 Virginia counties and 1 Maryland county. Clearly, PJM neither compiled nor compared impacts between this project and any of the other projects proposed. Making a recommendation in the absence of any substantive data is a travesty.

The risk analysis fails to mention that the exact same communities in Jefferson County, West Virginia and Loudoun County, Virginia are being targeted for a 500kv transmission line (Alt MARL Re-route) which this board approved in the same corridor in August of 2024.

Two massive electrical infrastructure projects, zigzagging through the same communities. Homes, farms and businesses will be taken and lives destroyed. The magnitude of the destruction is being trivialized. For these communities, this will be a third transmission tower more massive than the others. Homeowners and property owners in these counties would be forced to live with a massive infrastructure corridor for the sole purpose of providing energy to the data centers based on their speculative business plans. If approved, this would create a 550' path to host the existing 500kV plus the new 500kV that has not been approved or constructed with a 138kV under built plus the now proposed 765kV on a guyed V-lattice structure beside it. **For comparison purposes, a square 5 acre property is 511' x 511' - this is just about 5 acres wide!**

The guyed V-lattice tower construction is the foulest part of the proposal - this takes up the most land and is the most land use restrictive structure that could possibly be used. Farming, mowing, tending, vineyards - agricultural businesses - none of this is doable around guyed V-lattice structures. **For PJM to claim to have done a "Land Use" analysis to the extent that is required for the desktop review, without actually doing the review, and then recommend a 261 mile 765kV guyed V-lattice structure across these properties, businesses and parks is unconscionable.**

Project 262 (Proposal 708) traverses 32 conservation easements and crosses the Monongahela National Forest, Appalachian National Scenic Trail, Chesapeake & Ohio Canal National Historical Park, Harpers Ferry National Historical Park, Potomac Heritage National Scenic Trail and would run parallel down the Potomac River. This structure would be the dominant feature of the landscape for miles. There will not be any ridge line or view shed left unaffected. This project will destroy the view shed of multiple treasured recreational areas for every visitor. This affects everyone, whether boating, hiking, biking, taking photographs or just standing on a bridge enjoying the view. The C&O Canal alone has millions of visitors each year and so does the Appalachian Trail, Harpers Ferry has half a million. These parks are frequented by local residents of West Virginia, Virginia and Maryland as well as vacationers from all other states.

ALL of these parks and scenic areas are also being targeted by the 500kv line that was approved in August of 2024.

Further, the desktop review required the PJM to:

"b) Identify those permits and agency consultations that are complex and require long lead times, therefore, potentially significantly affecting the project in-service date. Specifically, evaluate federal and state authorizations required for potential impacts to sensitive environmental resources such as wetlands; rivers and streams; coastal zone management areas; critical habitats; wildlife refuges; conservation land; and rare,

threatened and endangered species. The assessment will result in a preliminary list of potential siting issues and permits that could impact cost and/or schedule, including estimated agency review times."

The statement "Coordination with USDA, USFWS, NPS *and numerous state and local agencies* will be required." on Pg 21 of the PJM RTEP 2024 Window 1 Constructability Analysis, doesn't accurately reflect the permitting requirements. Especially since multiple federal and state parks would now be impacted by both a 500kV transmission line and a 765Kv transmission line. PJM obviously "fluffed" over this section as well.

The risk analysis fails to consider that Transource, Dominion and First Energy would be simultaneously siting and building a 500kv line with an in-service date of 2032 and the proposed 765kv of Project 262 with an in-service date of 2029 in the same corridor through Jefferson County, WVA and Loudoun County, Virginia and through the same set of national and state parks!

On pg 24 of the PJM RTEP 2024 Window 1 Constructability Analysis is the patently false assertion: "FirstEnergy, including its participation in the joint venture, has significant experience with the proposed equipment and the capabilities to construct Proposal 708 as submitted. *The proposing entity experience and capability risk is considered low.*" Neither First Energy, Dominion nor Transource have any experience building a 765kV transmission line. None of these companies has ever built a 765kV transmission line. AEP (American Electric Power), the parent company of Transource is the only utility with any experience building a 765kV line.

The constructability analysis summary refers to this project as being "tricky", to be clear the constructability analysis is a total farce. Neither the cost estimate nor schedule risk assessments are accurate either.

On a personal level, both the 500kV transmission line and the now proposed Project 262 (Proposal #708), put our home and the homes of our family members in the path of these transmission lines. This includes the homes of both of our brother/brother-in-law and his family, our parents/in-laws home, our Aunts property and two lots which already have wells and septic for future generations. All of this is in the path of this transmission line. This is a rural family subdivision which could very well be destroyed along with the lifestyle we all enjoy.

Project 262 was rated the most risky project for its In-Service Date of 2029 due to both schedule and constructability risks. The risks are intentionally understated, glossed over and blatantly propagandized! The project is clearly underbid (there is no way it will be permitted to be built with guyed-wires and V-lattice) and there are no cost caps. On top of all of this, Project 262 is a non-competitive "joint" proposal by a cartel of three incumbent transmission owners whom didn't form a separate entity to bid the project

*Project 262 is NOT the only solution for transmission nor is transmission the only solution for the data center expansion / projected energy load in Loudoun County, Virginia.*

We urge the PJM Board of Managers to reject PJM 2024 Window 1 Project 262 . Do NOT approve Project 262.

Sincerely,

Alfred P. Ghiorzi & Mary Ghiorzi  
[Redacted]  
Lovettsville, VA [Redacted]



February 17, 2025

The PJM Board of Managers Mark Takahashi,  
Chairman and Manu Asthana,  
PJM President and CEO PJM Interconnection, L.L.C.  
2750 Monroe Boulevard Audubon, Pennsylvania 19408

RE: Transource Project 9-A

This is a request from a rate payer to cancel Transource Project 9-A. The PJM TEAC's recommendation to retain the Transource Project 9-A is an attempt to bail out a suspended project that has spent well over \$100M without beneficial results and the ratepayers you serve deserve better than this. It's time to move forward and cancel Project 9-A once and for all. This is not a market efficiency project as approved by PJM a decade ago, Project 9-A was suspended in 2021 after the Pennsylvania PUC denied a permit for the project. PJM has since determined that Project 9-A will actually cause more congestion and reliability issues and its current benefit/cost ratio is 0.81. Project 9A will not break even; it appears to be obsolete and will cost consumers.

Furthermore Project 9-A by the TEAC has lacked transparency and PJM has not followed the rules, specifically section 1.5.7(f) of Schedule 6 in the Operating Agreement. A suspended project must be reviewed annually and if there are changes in costs and benefits, PJM must review the changes and make a recommendation to PJM's Board of Managers on whether the project should be retained. Retention of the project should be an act of the Board of Managers, not PJM's TEAC. The TEAC is asking the Board of Managers to give them another chance to create a need for Project 9-A. However, the Board of Managers must independently evaluate the TEAC's treatment of Project 9-A over the past several years and cancel this project once and for all.

As ratepayers, we are already struggling under the enormous financial weight of the numerous projects and reviving Project 9-A is an unnecessary financial burden. Please don't add to our financial stress by approving bad projects.

Sincerely,

Lantz W. Sourbier

Chambersburg, PA

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February 28, 2025

The PJM Board of Managers  
Mark Takahashi, Chairman and  
Manu Asthana, PJM President & CEO  
PJM Interconnection LLC  
2750 Monroe Boulevard

Audubon, Pennsylvania 19408

RE: 2024 Window 1, Project 262, 765kV 261-mile transmission line

Dear Board Members,

We write to respectfully request you to reconsider and reject the TEAC's recommendation of Project 262 (also known as Project 708).

The proposal for a two hundred and sixty-one (261) mile overhead 765kV line, with an accompanying two hundred (200) foot easement will have a dramatic effect on the environment and residents of Jefferson County, WV. Please see below a summary of the reasons you should reject PJM 2024 Window 1 Project 262:

1. There was no competitive bid on the project, but rather the "win" was granted to the three incumbent transmission owners (Dominion, FirstEnergy and American Electric Power). The bid amount was \$343.98M and 17% less than the independent cost estimate determined.

Additionally, the project has an in-service date of December 2029, which is already projected to be extended three years (to 2032) due to the lack of a proper analysis as required in accordance with PJM Manual 14F 8.1.2.

Project 262 proposes expansion of the existing right-of-way, more than doubling the current right-of-way. The maps of the project state the project will "use" the existing right-of-way, incorrectly disregarding the additional land that would be required to include this new project. The current right-of-way is already surrounded by homes, schools, parks, solar farms and other developments. To expand, many families risk the loss of their homes, often times a family's greatest investment.

2. Neither Dominion nor FirstEnergy have any experience building a 765kV transmission line. Though AEP (American Electric Power) has experience, the risk assessment specifically lists that FirstEnergy has significant experience and the risk is low. However, this is completely inaccurate.

3. The risk analysis also fails to mention that the exact same communities are already impacted by a new 500kV transmission line on top of the existing line. This parallel siting has a definite risk of destroying existing communities. Choosing an alternate path in pure greenfield would be able to avoid existing homes and other obstacles. Additionally, a more direct alternate route would parallel Route 7, completely avoiding crossing through Harpers Ferry National Park and the C&O Canal.

It is unethical to play political favors in the construction of new transmission lines, and PJM should rather take every effort to avoid the current damage proposed.

4. In the mid-2000s a nearly identical project was proposed and approved, known as the Potomac-Appalachian Transmission Highline (PATH) Project. However, after immense

opposition, the project was suspended in 2011 and cancelled in 2012. The PATH project is widely known for its negative reputation, and renaming the project does not sever the connection this project has with such a horrible reputation. Since then, there are only more residents and opponents to Project 262.

Given these facts and the impact Project 262 will have on the existing community of Jefferson County, WV we strongly request you to reject this project.

Sincerely,

Delaney Ivins-O'Keefe & John Dudley Jr.

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**From:** O'Brien, Mike < >

**Sent:** Saturday, February 15, 2025 10:47 AM

**To:** Anders, David < >

**Subject:** Opposition to Project 262 / 708 2024 Window 1 – 765kV 261-mile transmission line

***February 15, 2025***

**VIA ELECTRONIC MAIL**

The PJM Board of Managers  
Mark Takahashi, Chairman and  
Manu Asthana, PJM President and CEO  
PJM Interconnection L.L.C.  
2750 Monroe Boulevard  
Audubon, Pennsylvania 19403

RE: Opposition to Project 262 2024 Window 1 – (708) 765kV 261-mile transmission line

I am strongly opposed to Project 262 of the 2024 Window 1 projects. For the reasons set forth below, I urge the PJM Board of Managers **to reject** PJM 2024 Window 1 Project 262.

This project was not competitively bid or awarded. Incumbent utilities FirstEnergy, American Electric Power and Dominion made a joint proposal thwarting competition. The utilities did not have to compete with each other to propose a project that was cost effective for ratepayers and the project bid did not include any cost caps! Additionally, the project is under bid as it is based on Guyed V-lattice tower construction. Not only won't this work across most of the terrain, ***Guyed V-lattice towers are possibly the foulest, most land use restrictive, intensive and invasive electric infrastructure available!***

The Constructability and Financial Analysis of the project was not performed as required. The process for the analysis listed on **PJM RTEP 2024 Window 1 Constructability Analysis Pg.16**, required a review of land use mapping that identified residences within both 100 feet and 250 feet of the proposed line, along with identification of conservation easements, public land, and historic structures and districts ***in***

*acres* and the count as well as a Public Lands mapping review with types, acreage and counts (etc). ***PJM did not perform this analysis at all.*** The maps of the project indicate the project will be built on existing easements when ***PJM has stated that it will require a new easement 200' for its entire 261-mile length.***

The impacts of this proposal are being intentionally trivialized and glossed over. The **proposed route crosses 15 miles of private property and conservation easements in Western Loudoun County** that would be subject to eminent domain takings of 200' easements. **Another @365 acres of private property to be taken to support data center expansion.** This impacts the same area in Western Loudoun County that is the target of the new 500kV transmission line that was approved by PJM's Board of Managers in August of 2024 (Alternate MARL Re-Route) which is expected to take additional easements as well!

Project 262 (similarly to Alternate MARL Re-Route) will cross ***the Monongahela National Forest, Appalachian National Scenic Trail, Chesapeake & Ohio Canal National Historical Park, Harpers Ferry National Historical Park, Potomac Heritage National Scenic Trail and it will run parallel down the view shed of the Potomac River and will destroy the scenic and historic value of these assets.***

This will be a third transmission tower even bigger than the other two - a 500kV plus a 500kV with a 138kV underbuild plus a 765kV Guyed V-lattice structure beside it! This will have a devastating effect on property owners all along the route and will render thousands of acres of property worthless!

***As a 30 year resident of western Loudoun County, I object to our land and our scenic views being further destroyed for the benefit of businesses that value profits over people. The impact on parks and historic areas is completely unacceptable, not to mention private property owners. It's pretty clear that there is some deception and manipulation going on here. Please put a stop to this.***

Project 262 ***was rated the most risky project*** for its In-Service Date of 2029 due to both schedule and constructability risks. ***Project 262 is NOT the only solution for transmission nor is transmission the only solution for the data center expansion / projected energy load in Loudoun County, Virginia.***

Once again, I urge the PJM Board of Managers **to reject** PJM 2024 Window 1 Project 262 .

Sincerely,

Michael and Tessa O'Brien  
Lovettsville, VA

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February 17, 2025

The PJM Board of Managers  
Mark Takahashi, Chairman and  
Manu Asthana, PJM President and CEO  
PJM Interconnection L.L.C.  
2750 Monroe Boulevard  
Audubon, Pennsylvania 19408

RE: Transource Project 9-A

Dear Board Members,

The Coalition To Protect Franklin County (**CTPFC previously known as Stop Transource Franklin County**) has a mission statement of, Endeavoring to protect, preserve and procure Franklin County. It is our goal to forever preserve and protect the richest, most beautiful and highly productive farmlands of Franklin County. Keeping a healthy environment and long term sustainable agricultural economy procuring our rich agricultural heritage free from unnecessary harmful impacts to our landowners, the environment and waterways. Endeavoring to protect agriculture and help to educate the public on good farming practices and land use, and food production and or distribution for those Franklin County Residents in need.

Projects like 9A cause undue burden for residents of Pennsylvania already in a financially stressed and turbulent environment, not to mention all the irreparable damage to landowners and the community.

**It's time to cut the FAT!** For Nine years PJM has assisted Transource in continually wasting rate payers money, all on a guarantee from Ferc to garner 10.4% of all of its expenditures. I am hard pressed to feel that PJM is reliable in making good decisions after this debacle known as project 9A. It's a fact, we all know the project 9A does not currently meet the cost benefit ratio to be built and has never met the ratio and never will unless falsely represented by PJM. It's absurd that this project has spent over 100 million dollars, paying land owners, buying components, and endless legal fees even before a project has ever been approved by the state. It's no wonder that FERC and more elected officials are now watching closely. It's hard to hide all the intentional wasteful spending that has happened on a project that was never approved by the state of Pennsylvania. PJM looks really bad as it continues to be the enabler. This is so clearly a fleecing of the rate payer.

In the TEAC meetings that I attend, the PJM representatives continually act like they have no idea there are steps and processes in place, of which they have to comply. PJM is not only making a mockery of its own processes, but It is very clear that they will try to revive a dead project and do as they wish with no regard to the facts and the competitive process.

PJM has not followed its own rules, specifically section 1.5.7(f) of Schedule 6 in the Operating Agreement. A suspended project must be reviewed annually and if there are changes in costs and benefits, PJM must review the changes and make a recommendation to PJM's Board of Managers on whether the project

should be retained. Retention of the project should be an act of the Board of Managers, not PJM's TEAC. The TEAC is asking the Board of Managers to give them another chance to create a need for Project 9A. However, the Board of Managers must independently evaluate the TEAC's treatment of Project 9A over the past several years and cancel this project once and for all.

It is up to the Board of managers to do what is right and abandon project 9A! However if the project remains on the suspended list I will have no other recourse than to turn FERC.

I respectfully request that the board give clear direction to abandon this project to save the integrity of the process and the possibility to start to restore the faith of the rate payer in PJM.

**Respectfully submitted,  
Coalition To Protect Franklin County.  
President, Board of Directors  
Lori Rice  
Chambersburg PA**

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February 14, 2025

The PJM Board of Managers  
Mark Takahashi, Chairman and  
Manu Asthana, PJM President and CEO  
PJM Interconnection L.L.C.  
2750 Monroe Boulevard  
Audubon, Pennsylvania 19408

RE: Opposition to Project 262 2024 Window 1 – (#708) 765kV 261-mile transmission line

I am strongly opposed to Project 262 in the recommended 2024 Window 1 Projects and urge the PJM Board of Managers to reject PJM 2024 Window 1 Project 262 for the reasons stated below:

- I. **FERC Order 1000 requires competitive bidding. Project 262 is a "joint" proposal by a cartel of three incumbent transmission owners, First Energy, Transsource and Dominion who did not form a separate entity to bid the solution - this project was therefore not competitive.**

The source of the power is Appalachian Power's John Amos Power plant in West Virginia. It was commissioned in September of 1971 and at 54 years old, it has already exceeded the average lifespan for coal fired generation plants. On top of that, the John Amos plant is losing money, between March of 2023 to February 2024 the John Amos plant lost \$49M<sup>1</sup>

The demand for this energy is uncontrolled data center expansion in Loudoun County, Virginia. New generation in Virginia would be the appropriate least cost solution. Dominion is the dominant builder of generation in Virginia.

A 765kV build out has been AEP's business plan since the late 1960s, the last time a 765kV transmission line "solution" was trotted out was 2006<sup>2</sup>. Proposal #708 is essentially the same as the PATH 765kV transmission line defeated in 2012 due to historic opposition.

American Electric Power (AEP), is the parent company of Transsource and Appalachian Power is a subsidiary of American Electric Power (AEP), all of these in addition to First Energy and Dominion are incumbent generation and/or transmission owners that 'collaborated' on this proposal, they did not compete for it.

For reference purposes: A cartel is a group of independent market participants who collude with each other as well as agreeing not to compete with each other in order to improve their profits and dominate the market.

- II. **The bid cost estimate for the Project 262 2024 Window 1 – (#708) 765kV 261-mile transmission line is underbid by 30% to 40% .**

Guyed wire and V-Lattice towers require a much larger area. This is the most land use restrictive

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<sup>1</sup>Public Broadcasting, July 24, 2024: "PSC Witness: Appalachian Power Is Losing Money On Coal Plants"

Available here: <https://wvpublic.org/psc-witness-appalachian-power-is-losing-money-on-coal-plants/>

<sup>2</sup> Appalachian Power, "AEP and Allegheny to form joint venture company to build 765-kV transmission in PJM; JV would build the first half of the AEP I-765™ Interstate Project transmission superhighway", Available here: <https://www.appalachianpower.com/company/news/view?releaseID=908>

structure type that could possibly be proposed, structures of this type are not suitable through the mountains and will not be permitted through agricultural areas or residential areas, they are an eyesore through scenic landscapes. In all honesty, these companies should have been ashamed to put forward a proposal based on a guyed wire V-lattice structure through this region. For PJM to recommend it is even more galling.

Guyed wire and V-Lattice towers are on average about 61% of the cost of self supporting towers - changing the structure type will increase the cost significantly.

Additionally, a comparison to the PATH project of 2006 adjusted for inflation results in a cost estimate of \$2.4B .

The bid did not include cost controls or price caps nor did it include inflation. The cartel wrote themselves a blank check at ratepayer expense and will use the "standard" scope change mechanism to rubber stamp themselves the additional funds as needed. The sky is the limit. All with a generous incentive rate to top it off.

**III. The in-service date specified for the 2024 Window 1 Projects is 2029. Project 262 (#708) has no chance of meeting a 2029 in-service date.**

On pg 28 of the Constructability Analysis, the proposed in-service date of December 2029 is characterized as "aggressive". Six months ago in August of 2024, the PJM Board of Managers approved a scope change to a 500kV transmission line (Alternate MARL Re-Route) and slipped the in-service date for that transmission line from 2029 to 2032.

PJM has asserted that a 500kv line through the same corridor that has a "six month head start" cannot be completed until 2032 but a 765kV transmission line can be built concurrently in that same corridor by 2029 by three transmission owners none of whom has ever built a 765kV transmission line?

The last 765kV transmission line built between West Virginia and Virginia was the 90 mile Wyoming - Jackson Ferry 765kV transmission line.<sup>3</sup> The permitting process for that transmission line began in 1991, the final approval and Environmental Impact Statement from the Forest Service was in 2002 and the line was not energized until June of 2006 . Fifteen (15) years for a transmission line that is 1/3 the length of the proposed line.

The three transmission owners with no experience building a 765kV transmission line will build a 261 mile transmission line in 5 years , 10 years faster than the 90 mile Wyoming-Jackson Ferry 765kV line which took 15 years .<sup>4</sup>

**The reality is Project 262 Proposal #708 is not likely to be completed before 2040**

**To simply say a 2029 In-Service date is a fantasy would be an understatement, this is delusional.**

Project 262 Proposal #708 will not meet the 2029 in-service date which was specified as part of the 2024 Window 1 solution requirements and should not be approved.

<sup>3</sup> South Western Electric Power Company, "AEP Dedicates Wyoming-Jacksons Ferry Line; Project Nears completion 16 years after Announced", Available here: <https://www.swepco.com/company/news/view?releaseID=837>

<sup>4</sup> Ibid



IV. None of the incumbent utilities that submitted the joint proposal have ANY experience building a 765kV transmission line.

The risk assessment statement on pg 24 states:

"FirstEnergy, including its participation in the joint venture, has significant experience with the proposed equipment and the capabilities to construct Proposal 708 as submitted. *The proposing entity experience and capability risk is considered low.*"

Neither FirstEnergy, Dominion nor Transource have ever built a 765kv transmission line. The ONLY utility with any experience building a 765kV line is AEP (American Electric Power), the parent company of Transource.

There is no way that PJM is not aware that these companies have NO 765kV experience. Multiple PJM TEAC participants asked questions on this topic and it was confirmed - **these companies have ZERO experience building a 765kV transmission line. That makes for a VERY HIGH risk.**

It is baffling why the proposing entity experience and capability risk was not updated to reflect the lack of experience after the conversation at the PJM TEAC in January.

V. The land acquisition and land use impacts of this proposal are intentionally manipulated to trivialize the socio- economic and environmental cost to the communities it will traverse.

The redacted proposal for Proposal 708 of Project 262 explicitly states it requires a new 200' easement for its entire 261-mile length. The Constructability Analysis fails to mention a new 200' easement is required for the entire 261 mile length of the transmission line. The Constructability Analysis and map should show a "green" line for the entire length of the transmission line. The "pink" segment implying utilization of the existing ROW is a gross misrepresentation of the land acquisition and property impact.



The discrepancy between the redacted proposal, the content of the Constructability Analysis and the map provided in the PJM TEAC charts was brought up and discussed at the PJM TEAC. It was confirmed that the redacted Proposal 708 of Project 262 was correct - this transmission line requires a new 200' easement for its entire 261 mile length.

A 765kV transmission line cannot share a ROW with either a 500kV transmission line or a 500kV transmission line with a 138kV under built.

Once again, in spite of the discussion and feedback, PJM chose to continue to misrepresent the acquisition and property impact to landowners along the route.

Alternate MARL Re-Route, which was approved by this Board in August of 2024, would be constructed concurrently in this same corridor.

For communities in Jefferson County, West Virginia and western Loudoun County, Virginia, Project 262 Proposal #708 would be a THIRD HVAC transmission line through their communities and across their farms and property: the existing 500kV, a new 500kV that has not been constructed with a 138kV under built plus a 765kV guyed V-lattice structure beside it!

Transource, Dominion and First Energy would be simultaneously siting and building a 500kv line with an in-service date of 2032 and the proposed 765kv of Project 262 with an in-service date of 2029 in the same corridor through Jefferson County, WVA and Loudoun County, Virginia.

- VI. **A Constructability and Financial Analysis of the project was not performed**  
PJM failed. **There is nothing in the analysis that would indicate a desktop review was conducted as required**. PJM did not bother to do any analysis on land-use impacts, not even to identify the number of residences or lots impacted. The process for the analysis listed on PJM RTEP 2024 Window 1 Constructability Analysis Pg.16 states:

" (a) **Conduct a desktop review** to identify significant barriers that might add additional risk to the project, and determine whether the proposed project area (a study area that is defined for each project) can support the economical construction of the electric transmission and/or substation facilities.

The following target information will be referenced by as required and as allowable by available public data sources:

- National Wetland Inventory mapping from United States Fish and Wildlife Service (USFWS), which will include counts and acreages of:
  - Total Non-Tidal Wetlands
  - Wetlands of Special State Concern
  - Subaqueous Lands
  - Total Wetlands
  - Non-Tidal (Non-Forested) Wetlands
  - Non-Tidal (Forested) Wetlands
- Mapping of specially designated Wetlands, streams or rivers, which will include:
  - Non-Tidal Waterbodies (Count/Acres)
  - 100-Year Flood Plain (Acres)
  - Watershed Boundaries (Count)
  - Outstanding and Exceptional Waters (Count)
  - Wild and Scenic Rivers (Count)
  - United States Geologic Survey Blue Line Streams (Count)
- United States Department of Agriculture(USDA)/The Natural Resources Conservation Service (NRCS) Land Cover mapping, which will include acreages of:
  - Sub-Aquatic Vegetation
  - Forested Uplands
  - Unforested Uplands
  - Agricultural Lands
- Land-Use mapping, which will include:
  - Residences within 100 feet (Count)
  - Residences within 250 feet (Count)
  - Land Zoned Conservation (Acres)
  - Rural Legacy (Acres)
  - Program Open Space (Acres)
  - Private Conservation Easements (Acres & Count)

- Public Land (Acres & Count)
  - Parcels Crossed (Count)
  - Green Infrastructure/Green Acres program (Acres)
  - National Estuarine Research Reserve Project Areas (Acres & Count)
  - Natural Heritage Areas (Acres & Count)
  - Environmental Trust Easements (Acres & Count)
  - Forest Legacy Easements (Acres & Count)
  - Tidelands
- Public Lands mapping review, which will include the types, counts and acreages of the following:
    - State/National Forests
    - Natural Areas
    - Preserves
    - Game Lands
    - Recreation Areas
  - Cultural Resources mapping review, including the count of previously identified resources, which will include the types, counts, and acreages of the following:
    - Listed and Eligible Historic Structures
    - Listed and Eligible Historic Districts
    - Listed and Eligible Archeological Sites
  - Aquatic Resource mapping, including the count of Submerged Historic Resources (if applicable)
  - Online distribution data of rare, threatened and endangered species within a 0.5- mile radius of the study area

**Project 262 will take at least 6,352 acres of land from rural property owners across 14 West Virginia counties, 3 Virginia counties and 1 Maryland county. It would impact 32 conservation easements.**

**Project 262 crosses the Monongahela National Forest, Appalachian National Scenic Trail, Chesapeake & Ohio Canal National Historical Park, Harpers Ferry National Historical Park, Potomac Heritage National Scenic Trail and it will run parallel down the view shed of the Potomac River. Project 262 will destroy the scenic and historic value of these assets. ALL of these parks and scenic areas are also impacted by the 500kv line that was approved in August of 2024. This will significantly decrease the enjoyment of the visitors to these sites.**

**Project 262 Proposal #708 is three times larger than the 90 mile Wyoming - Jackson Ferry 765kV transmission line and impacts considerably more federal and state parks, conservation areas, homes, lots and conservation easements.<sup>5</sup> The scoping document for the EIS for the similarly situated PATH transmission line was 900 pages, that project was canceled before the EIS was completed. In the case of Project 262 Proposal #708, there would be multiple EISs for all of these national parks simultaneously, due to the 500kV which is concurrently scheduled.**

**In terms of land use, the risk analysis fails to mention that the exact same communities in Jefferson County, West Virginia and Loudoun County Virginia are already being impacted by a 500kv transmission line, known as Alternate MARL Re-route, approved by the PJM Board in August of 2024. Project 262 will have a devastating effect on property owners all along the route. Homes that are not demolished outright will be seriously devalued and thousands of acres of property will be made worthless! In Loudoun alone, 365 acres would be impacted by Project 262 - Proposal 708.**

<sup>5</sup> CRSWire, "AEP receives final approval for Wyoming-Jacksons Ferry 765kV project" Available here: [https://www.crswire.com/press\\_releases/26498-aep-receives-final-approval-for-wyoming-jacksons-ferry-765-kv-project](https://www.crswire.com/press_releases/26498-aep-receives-final-approval-for-wyoming-jacksons-ferry-765-kv-project)

I live Western Loudoun County. I enjoy the scenery along the Potomac River, the farms the parks and conservation areas. Members of my family all live within walking distance, this is a family subdivision with our homes, gardens, orchards and berry patches. My parents home, the homes of both of my brothers and their families, my Aunt's property and lots with wells and septic fields are all in the area targeted by these lines. I have no intention of leaving and my property is not for sale. This is three generations, if any of our properties are taken by eminent domain and forced to host these lines, all of the lots will be affected and we will all be devastated.

The constructability analysis contains no substantive information beyond the redacted proposal, and in fact leaves out key content that was in the redacted proposal. There was no basis upon which to compare this project to the other projects.

The constructability analysis is bereft of the content necessary to make a comparison between projects and is clearly slanted to:

- trivialize the property, environmental and socio-economic impacts to the communities to be traversed,
- obfuscate the risks and
- promote the preferred project of incumbent transmission owners and PJM. That would be AEP's project I-765 which they have been pushing for over a decade at this point<sup>6</sup>

By far the most ridiculous piece of propaganda in this farcical analysis is the constructability summary on page 23 which reads in part: "The proposal is a long set of lines crossing multiple states and has its fair share of **tricky areas** as any project this **ambitious** would."

Let me quantify "tricky" and "ambitious" for you:

- a proposal by a cartel of three incumbent transmission owners who wrote themselves a blank check to build a 765kV transmission line although they have no experience building a 765kV transmission line
- using guyed wire V-lattice structures - the most destructive and land use restrictive structure that could possibly be used
- requiring a 261 mile 200' greenfield easement - a total of at least 6,352 acres of land to be acquired in new easements across three states
- across 14 counties in West Virginia whose landowners DO NOT gain any benefits from this project
- through 3 Counties in Virginia
- across 32 conservation easements
- permitting through 6 national and state parks (Environmental Impact Statements for multiple expansions of those easements for the Alternate MARL Route 500kV plus this 765kV running concurrently)
- along the ridge line of scenic mountains and the view shed and the Potomac River, an eye sore for miles
- across the Potomac River and into Frederick County, Maryland

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<sup>6</sup> Ibid



- to be built concurrently as a 500kV transmission line with a 138kV under build that has an in-service date of 2032, but the 765kV is to be completed three years earlier in 2029
- three transmission owners with no experience building a 261-mile 765kV transmission line scheduled to build the line in 5 years which would be 10 years faster than the 90 mile Wyoming-Jackson Ferry 765kV line which was built by the only company with experience building 765kV transmission lines
- the SECOND HVAC transmission line to be proposed inside of 6 months across two of these counties, which combined results in a 550' - 600' ROW with THREE HVAC transmission lines if both were approved. AND similarly simultaneously affecting multiple state and national parks. Note: A 5 acre property is 511' x 511' - the resulting ROW would be MORE THAN 5 acres wide
- along the same corridor as the PATH transmission line which was denied in 2012 due to historical landowner opposition which resulted in 10 years of litigation over accounting practices .

Let me summarize, Project 262 Proposal #708 :

- was proposed by a cartel with no experience in building 765kV transmission lines
- is underbid by 30% - 40%
- has a required in-service date of 2029 which it has NO chance of meeting
- to satisfy the energy use wants of net-zero data centers funded by venture capital that have not been built yet with coal fueled generation that the same companies are supporting legislation to close
- connects an existing 54 year old coal plant that is losing money, has increasing maintenance costs and is well past its prime

This is not an "ambitious" project it is a massive gift. The only motivation for this project is pure unadulterated greed.

Even with the bogus constructability analysis, Project 262 was rated the most risky project for its In-Service Date of 2029 due to both schedule and constructability risks.

*Project 262 is NOT the only solution for transmission nor is transmission the only solution for the data center expansion /projected energy load in Loudoun County, Virginia.. New generation in Virginia would be the appropriate least cost solution.*

**I urge the PJM Board of Managers to reject PJM 2024 Window 1 Project 262 . Do NOT approve Project 262.**

Regards,

Theresa Ghiorzi

Lovettsville, VA

The PJM Board of Managers  
Mark Takahashi, Chairman and  
Manu Asthana, PJM President and CEO  
PJM Interconnection L.L.C.  
2750 Monroe Boulevard  
Audubon, PA 19408

Gentlemen:

I am writing to oppose the Project 262 that is being proposed to cross through Jefferson County, WV to give power to the data centers in Loudoun County, VA.

This project was not competitively bid or awarded. PJM utilities First Energy, American Electric Power and Dominion made a joint proposal in order to thwart competition and fix prices. The utilities did not have to compete with each other to propose a project that was cost effective for ratepayers and the project bid did not include any cost caps.

PJM's maps of the project incorrectly claim that the project will be built on existing easements when PJM has stated that it will require a new easement for its entire 261-mile length.

PJM's Constructability and Financial Analysis of the project was not performed as required. PJM's stated process for the analysis required a review of land use mapping that identified residences within both 100 feet and 250 feet of the proposed line, along with identification of conservation easements, public land, and historic structures and districts. PJM did not perform this analysis at all.

Project 262's proposed route crosses through a dense development corridor in Jefferson County and is surrounded by hundreds of homes that would be in jeopardy of condemnation and taking using eminent domain. Our house is one of them.

There is no reason to route this project through Jefferson County when it would be easier and cheaper to route it directly to its ultimate connection point in Loudoun County's data center alley.

This project will cross Harpers Ferry National Park, the Appalachian Trail, and the C&O Canal National Park and will destroy the scenic and historic value of these assets. The project could be routed alongside existing highways such as Virginia's Route 7 instead of through residential and park properties in Jefferson County.

Virginia has clean energy laws and by running an extension cord to export West Virginia's coal-fired electric resources to Virginia will cause more pollution and higher electric rates on West Virginians who struggle now to pay their high electric bills.

This project has no benefit at all for West Virginia but we will be asked to foot the cost to build these lines. Many homes will be taken or will have unsightly and large power lines on their properties which will cause the property to devalue and hard to sell. We wanted to sell our

home on our own terms and get the money we wanted, not money dictated by eminent domain. I certainly don't want to live near these huge power lines as they are unsightly and who knows if they could cause health issues. Power companies say no but can we really trust them.

I am asking you not approve this project.

Respectfully,

Pamela J. Gearhart

Harpers Ferry, WV

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From: Susan Chudovan < >

Sent: Sunday, February 16, 2025 4:03 PM

To: Anders, David < >

Subject: Opposition to Project 262 2024 Window 1 – (708) 765kV 261-mile transmission line

Attention:

The PJM Board of Managers

Mark Takahashi, Chairman and

Manu Asthana, PJM President and CEO

PJM Interconnection L.L.C.

2750 Monroe Boulevard

Audubon, Pennsylvania 19408

I am strongly opposed to Project 262 of the 2024 Window 1 projects. For the reasons set forth below. I urge the PJM Board of Managers to reject PJM 2024 Window 1 Project 262.

This project was not competitively bid or awarded. Incumbent utilities FirstEnergy, American Electric Power and Dominion made a joint proposal thwarting competition. The utilities did not have to compete with each other to propose a project that was cost effective for ratepayers and the project bid did not include any cost caps! Additionally, the project is under bid as it is based on Guyed V-lattice tower construction. Not only won't this work across most of the terrain, Guyed V-lattice towers are possibly the foulest, most land use restrictive, intensive and invasive electric infrastructure available!

The Constructability and Financial Analysis of the project was not performed as required. The process for the analysis listed on PJM RTEP 2024 Window 1 Constructability Analysis Pg.16, required a review of land use mapping that identified residences within both 100 feet and 250 feet of the proposed line, along with identification of conservation easements, public land, and historic structures and districts in acres and the count as well as a Public Lands mapping review with types, acreage and counts (etc). PJM did not perform this analysis at all. The maps of the project indicate the project will be built on existing easements when PJM has stated that it will require a new easement 200' for its entire 261-mile length.

The impacts of this proposal are being intentionally trivialized and glossed over. The proposed route crosses 15 miles of private property and conservation easements in Western Loudoun County that would be subject to eminent domain takings of 200' easements. Another @365 acres of private property to be taken to support data center expansion. This impacts the same area in Western Loudoun County that is the target of the new 500kV transmission line that was approved by PJM's Board of Managers in August of 2024 (Alternate MARL Re-Route) which is expected to take additional easements as well!

Project 262 (similarly to Alternate MARL Re-Route) will cross Harpers Ferry National Park, the Appalachian Trail, and the C&O Canal National Park and will destroy the scenic and historic value of these assets.

This will be a third transmission tower even bigger than the other two - a 500kV plus a 500kV with a 138kV underbuild plus a 765kV Guyed V-lattice structure beside it! This will have a devastating effect on property owners all along the route and will render thousands of acres of property worthless!

Project 262 was rated the most risky project for its In-Service Date of 2029 due to both schedule and constructability risks. Project 262 is NOT the only solution for transmission nor is transmission the only solution for the data center expansion / projected energy load in Loudoun County, Virginia.

Once again, I urge the PJM Board of Managers to reject PJM 2024 Window 1 Project 262 .

Sincerely,  
Susan Chudovan

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From: Jack Chudovan < >  
Sent: Sunday, February 16, 2025 4:07 PM  
To: Anders, David < >  
Subject: Opposition to Project 262 2024 Window 1 – (708) 765kV 261-mile transmission line

>> Attention:

>> The PJM Board of Managers  
>> Mark Takahashi, Chairman and  
>> Manu Asthana, PJM President and CEO  
>> PJM Interconnection L.L.C.  
>> 2750 Monroe Boulevard  
>> Audubon, Pennsylvania 19408  
>>

>> I am strongly opposed to Project 262 of the 2024 Window 1 projects. For the reasons set forth below. I urge the PJM Board of Managers to reject PJM 2024 Window 1 Project 262.

>>

>> This project was not competitively bid or awarded. Incumbent utilities FirstEnergy, American Electric Power and Dominion made a joint proposal thwarting competition. The utilities did not have to compete with each other to propose a project that was cost effective for ratepayers and the project bid did not include any cost caps! Additionally, the project is under bid as it is based on Guyed V-lattice tower



construction. Not only won't this work across most of the terrain, Guyed V-lattice towers are possibly the foulest, most land use restrictive, intensive and invasive electric infrastructure available!

>>

>> The Constructability and Financial Analysis of the project was not performed as required. The process for the analysis listed on PJM RTEP 2024 Window 1 Constructability Analysis Pg.16, required a review of land use mapping that identified residences within both 100 feet and 250 feet of the proposed line, along with identification of conservation easements, public land, and historic structures and districts in acres and the count as well as a Public Lands mapping review with types, acreage and counts (etc). PJM did not perform this analysis at all. The maps of the project indicate the project will be built on existing easements when PJM has stated that it will require a new easement 200' for its entire 261-mile length.

>>

>> The impacts of this proposal are being intentionally trivialized and  
>> glossed over. The proposed route crosses 15 miles of private property and conservation easements in Western Loudoun County that would be subject to eminent domain takings of 200' easements. Another @365 acres of private property to be taken to support data center expansion. This impacts the same area in Western Loudoun County that is the target of the new 500kV transmission line that was approved by PJM's Board of Managers in August of 2024 (Alternate MARL Re-Route) which is expected to take additional easements as well!

>>

>> Project 262 (similarly to Alternate MARL Re-Route) will cross Harpers Ferry National Park, the Appalachian Trail, and the C&O Canal National Park and will destroy the scenic and historic value of these assets.

>>

>> This will be a third transmission tower even bigger than the other two - a 500kV plus a 500kV with a 138kV underbuild plus a 765kV Guyed V-lattice structure beside it! This will have a devastating effect on property owners all along the route and will render thousands of acres of property worthless!

>>

>> Project 262 was rated the most risky project for its In-Service Date of 2029 due to both schedule and constructability risks. Project 262 is NOT the only solution for transmission nor is transmission the only solution for the data center expansion / projected energy load in Loudoun County, Virginia.

>>

>> Once again, I urge the PJM Board of Managers to reject PJM 2024 Window 1 Project 262 .

>>

>> Sincerely,

>> John Chudovan III

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February 15, 2025

VIA EMAIL ONLY: DAVID.ANDERS@PJM.COM

The PJM Board of Managers  
Mark Takahashi, Chairman  
Manu Asthana, PJM President and CEO  
PJM Interconnection L.L.C.  
2750 Monroe Boulevard  
Audubon, Pennsylvania 19408

RE: Project 262 / 708 Transmission Line Across WV - John Amos

Board Members,

I write to you to strongly encourage and request that you not follow the TEAC's recommendation regarding Project 262/708 – the Transmission Line Across WV ("Project"). I am an attorney and a landowner who will be directly affected by this Project. This Project will cause the family farm that has been in my wife's family, that we now own, to be destroyed. The historic farmhouse that has been there for approximately 175 years will be made unlivable, the property will be divided and thus unusable. So I implore you for personal reasons, as well as many others, including but not limited to failing to follow the requirements of PJM's Manual 14F. This is not an exhaustive letter, and I don't limit my rights to raise other issues later, if necessary, but this letter merely highlights a few of the many issues with this Project.

First, there are numerous incorrect claims associated with the project, in addition to the failure for the Project to be competitively bid. The Project is senseless and meritless and will be a repeat of the epic failure of the previous project commonly known as PATH – as it used the same or virtually the same planned route for installation of this transmission line.

In that PATH project, certificates of public need were sought in three states and none of the three states ever issued a certificate – nor should any of those states this time. PATH was never built as it was not an appropriate plan then, nor is the Project now appropriate. The PATH debacle cost consumers approximately Two Hundred-Fifty Million Dollars (\$250,000,000.00) for a project that failed. This sort of irresponsible action should not occur a second time.

There are significantly better options for providing power to the end users than what is being proposed in this Project. This solution is purely a lazy solution without any thought for the environmental impact, impact on the people, and what is best overall solution for the end user.

There are a plethora of reasons that this Project should not proceed and the Board should elect to not proceed with this Project. Below are a few of those reasons:

1. The amount of electricity that will be lost in this Project is astronomical. The amount of line loss will be between two and ten percent (2% to 10%). Even if the line loss is on the lower end, the cost of this lost electricity is astronomical and senseless – it should also be factored into the decision of whether this Project would go forward or not.
2. The path the Project is taking to the end user is not the most direct. The Project appears to simply be attempting to follow the PATH prior proposed line from a decade ago. This is nonsensical and will not create cost savings, as all new studies will be required and this route failed previously.
3. The Project will not supply power to West Virginia yet West Virginia is expect to bear an inordinate amount of the burden by this Project running through it and destroying significant parts of the land.
4. In the information provided, there are misleading and inaccurate estimates regarding Rights of Way, as well as other faulty and inaccurate information. A decision based on faulty or misleading information lacks foundation for a solid plan to proceed.
5. The Project should utilize public parks and lands to the maximum extent possible, not private lands – if this Project is to benefit the public then it should burden the public equally. Private landowners should not bear the burden of a power line being place on their property. Further, the Project should not go forward, as there are more suitable options that would not require this Project.
6. The maps regarding the Project are incorrect with regard to existing Rights of Way and misleading “parallel line” and “Greenfield” statements, which will further marginalize and degrade land, rendering it uninhabitable and useless. The worst thing we can do is ruin real estate with cancer causing project that will render the Rights of Way areas and areas around them useless for generations to come. There is no more land being made, so ruining hundreds of thousands of acres for this Project makes no sense when alternative options exist which are better in all respects.
7. The risk assessment does not accurately reflect the current risks, national security components, land degradation and rural usage, for which there is little to no infrastructure support in the event of fire or targeting. If the power generation were to be located nearer the end user, all of the aforesaid issues would be remedied.

8. Environmental risks also need to be assessed with neutral, unbiased scientists. A significant multi-year study should be done to evaluate the impact of this Project. A fund should be set up by PJM and a panel of individuals established for the protection of the rights of the citizens who are or may be affected by this Project and scientist selected by that panel should evaluate and report their findings. The Project is a high-risk endeavor, yet other options to provide power to these end users are less risky and should be selected. PJM and its Board has the burden of due diligence and fiduciary responsibility where public safety and public interest are elements of concern.
9. This Project in its current proposed form is a severe misuse of money, land, and time and is detrimental to consumers. Consumers are still paying for the failed PATH project from over a decade ago. To make a mistake once is normal, to knowingly repeat a mistake is the definition of insanity. To repeat the failure of PATH under a new name is just that...insanity.
10. This Project does not provide any benefits to residents of West Virginia, yet they bear the cost and burden of this Project destroying their land. Power generation should occur near the end users of the power, this creates a more stable grid without the need for hundreds of miles of transmission lines. To continue to abuse the citizens of West Virginia is outrageous. West Virginias's citizens have rights and should not be forced to bear the burnt of this Project and receive no benefit.

As I stated earlier, I am a landowner whose property will be affected by this Project, and I can assure you the fight that brought last time against the PATH project will occur again. I was not involved with the fight against PATH, as I didn't own property affected by PATH, but I do own property that will be affected by this Project, and I will fight to protect it. I hope you will select an alternative to this Project to supply power to the end user, or alternatively, the end user can move their project nearer to the power transmission facility and then West Virginia residents can benefit with additional jobs and there will be no need for this Project. I hope the Board of Managers will elect to terminate this Project and proceed with a different option that is more cost effective, less risky and more environmentally friendly.

*Douglas Thomas*

Douglas Thomas, Esquire

Belington, WV

(Barbour County, WV)

**RACHELLE LYNN CHANNELL**  
**PhD. Student, MPH, BS**  
**ITPSO, FSO, SPHR, GPHR, SHRM-SCP, TS/SSBI**  
Business: [REDACTED] | Cell: [REDACTED] | [REDACTED]

February 16, 2025

Via email only: [David.anders@pjm.com](mailto:David.anders@pjm.com)

The PJM Board of Managers  
Mark Takahashi, Chairman  
Manu Asthana, PJM President and CEO  
PJM Interconnection L.L.C.  
2750 Monroe Boulevard  
Audubon, Pennsylvania 19408

RE: Project 262 / 708 Transmission Line Across WV - John Amos

Board Members,

I am writing this to encourage your denial of the approval of TEAC's recommendation for Project 262, aka Project 708, while simultaneously expressing my disgust at the fraudulent and blatantly incorrect claims associated with the project in addition to the inappropriate and non-competitive manner in which it was bid and evaluated, which is non-compliant with PJM's Manual 14F.

My reasons for opposing this project are many and stem from the original PATH project in 2010 and 2011, which would have directly affected my property along with many others, in addition to newer relevant concerns that have surfaced over the last decade. Although new detailed maps have not yet been made available, the proposed new PATH line (262 / 708) appears to be that of the one proposed a decade ago, yet no new evaluation has been completed, rendering the proposal obsolete and archaic at best. The list below is not exhaustive, but it includes some of the main points.

1. Non-competitive bid: a monopoly was essentially formed to eliminate competition, but this monopoly was not a formed entity before the bid was made – but the bidders appear to have colluded and subsequently formed an entity in an attempt to control transmission projects in the PJM 2024 Window 1. Because there was no competition, the options for lower costs were eliminated, thus rendering the work to the monopoly, which then had the ability to form a joint entity (aka monopoly) to pursue Project 262 / 708. This is merely a brief bullet point but will be fully described later in the process should the proceedings continue.



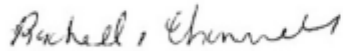
2. No current feasibility review was conducted.
3. The proposed line is not the most direct route to the end users which are outside of West Virginia, nor is this the most cost-efficient path to the end users of the power but rather exploits private homes and property in addition to protected lands. There are misleading ROW estimates, amongst other faulty and inaccurate information.
4. The Project 262 / 708 maps are incorrect with regard to existing ROW and misleading "parallel line" and "Greenfield" statements, which will further marginalize and degrade land, rendering it uninhabitable and useless.
5. The risk assessment does not accurately reflect the current risks, land degradation, national security components, and rural usage, for which there is little to no infrastructure support in the event of fire or targeting, thus destabilizing the entire line. Environmental risks also need to be assessed, and this time, with neutral, unbiased scientists and not those funded by the very entity seeking the project. Project 262 / 708 is a high-risk project, yet other projects are less risky. PJM owns the burden of due diligence and fiduciary responsibility, and public safety and interest are elements of concern. Should Project 262 / 708 continue, all of this information will be conveyed to the public.
6. A direct route from the generator to the data centers is the best option, or alternatively a power generation center should be built near the data centers, so that the power is produced locally near the end user. This would eliminate the need for Project 262/708 and reduce the overall electric needed, as there will be significantly less line loss and less damage to the environment overall. The frivolous Project 262 / 708 is a blatant misuse of land, money, and time. Should this project continue, the fight will be a repeat of the original Potomac Appalachian Transmission Highline project, which was ultimately canceled and one for in which the chairman criticized FERC for providing financial incentives. As a landowner possibly in the PATH of destruction for Project 262/708, I speak for many of us who fought in the original battle – that we have not stopped acquiring information since the original PATH, and we are fully prepared to once again combat this ludicrous project through regulatory, legislative, political, and media outlets.

7. Project 262 / 708 is an example of how West Virginia is continuously used as a sacrifice zone for purposes of energy transmission out of state and to destinations that in no way benefit residents and citizens of West Virginia and additionally will further displace and marginalize people even more than they already have been. It is time for this to end.

In 2010 and 2011, I fought PATH on behalf of my parents, whose property was directly affected by the poorly planned project. I am now the landowner of that very same property.

I am a PhD student researching the misuse and manipulation of populations and the environmental effects that marginalize them. I am also established in a career that supports national security. As a property owner affected by Project 262/708 within the sacrifice zone of West Virginia, that will be marginalized and ruined for the benefit of energy to be used outside of West Virginia, not unlike the situation with the original PATH in 2010 and 2011, I am prepared to fight. I will fully oppose this project by all legal means to force the issue of using nearby or co-sited energy sources instead of sacrificing WV land, especially privately owned land, for the benefit of people living outside of WV. I will also oppose this project through all political venues, regulatory processes, and media publications. The Board of Managers has the capacity to eliminate this project and to focus on other projects that are more cost-efficient and less risky.

Rachelle Channell



Doctoral Student, MPH, BS

Belington, WV, [REDACTED]

Barbour County

February 15, 2025

VIA EMAIL ONLY: DAVID.ANDERS@PJM.COM

The PJM Board of Managers  
Mark Takahashi, Chairman  
Manu Asthana, PJM President and CEO  
PJM Interconnection L.L.C.  
2750 Monroe Boulevard  
Audubon, Pennsylvania 19408

RE: Project 262 / 708 Transmission Line Across WV - John Amos

Board Members,

I write to you to strongly encourage and request that you not follow the TEAC's recommendation regarding Project 262/708 – the Transmission Line Across WV ("Project"). I am a Ph.D. and formerly was the Chief of the Toxicology and Molecular Biology Branch of the National Institute of Occupational Safety and Health in Morgantown, West Virginia. I implore you to reconsider this Project, as this Project does not follow the requirements of PJM's Manual 14F and will also have a significant impact environmentally and on the citizens of West Virginia. Below are a few of the many issues with this Project that I wanted to highlight.

First, there are numerous incorrect claims associated with the project, in addition to the failure for the Project to be competitively bid. The Project will likely be a repeat of the epic failure of the previous project known as PATH – as it uses the same or virtually the same planned route for installation of this transmission line.

In that PATH project, certificates of public need were sought in three states and none of the three states ever issued a certificate. The PATH project cost consumers approximately Two Hundred-Fifty Million Dollars (\$250,000,000.00) for a project that failed. This should not be repeated, as there are significantly better options for providing power to the end users than what is being proposed in this Project. This solution fails to consider the environmental impact, impact on the people, and what is best overall solution for the end user.

There are a multitude of reasons that this Project should not proceed, and the Board should elect not to continue with this Project. Below are a few of those reasons:

1. The amount of electricity that will be lost in this Project due to line loss alone is very significant (estimated between 2% and 10% on average). Even if the line loss is on the lower end, the cost of this lost electricity is astronomical. This cost must be factored into the decision of whether this Project would go forward or not.



2. The path the Project is taking to the end user is not the most direct. The Project appears to simply be attempting to follow the PATH prior proposed line from a decade ago. All new studies will be required and this route failed previously – so alternatives should be found.
3. The Project will not supply power to West Virginia, yet West Virginia is expected to bear an inordinate amount of the burden by this Project running through it and destroying significant parts of the land.
4. There are misleading and inaccurate estimates regarding Rights of Way, as well as other faulty and inaccurate information in the information provided.
5. Private landowners should not bear the burden of a power line being placed on their property. Alternative locations for power generation and alternative sources of power generation should be considered.
6. While the US EPA has not found a direct link to ELF -MF causing cancer in adults, studies suggest that it is a possibility, and further research is warranted before this Project should be completed.
7. The maps regarding the Project are incorrect with regard to existing Rights of Way and misleading “parallel line” and “Greenfield” statements, which will further marginalize and degrade land, rendering it uninhabitable and useless. If this Project creates an increased risk of cancer, the worst thing we can do is ruin such a large amount of real estate with a potentially cancer-causing project that will render the Rights of Way areas and areas around them useless for generations to come. There is no more land being made, so ruining hundreds of thousands of acres for this Project makes no sense when alternative options exist which are better in all respects.
8. The risk assessment does not accurately reflect the current risks, national security components, land degradation and rural usage, for which there is little to no infrastructure support in the event of fire or targeting. If the power generation were to be located nearer the end user, all or most of the aforesaid issues would be remedied.
9. Environmental risks also need to be assessed with neutral, unbiased scientists. A significant multi-year study should be done to evaluate the impact of this Project. A fund should be set up by PJM and independent scientists should evaluate and report their findings. The Project is a high-risk endeavor, yet other options to provide power to

these end users are less risky and should be selected. PJM and its Board have a fiduciary responsibility where public safety and public interest are elements of concern.

10. Consumers are still paying for the failed PATH project from over a decade ago. It would be a mistake to attempt the same plan as this Project when it failed previously.

11. This Project does not provide any benefits to residents of West Virginia, yet they bear the cost and burden of this Project destroying their land and potentially exposing them to significant health. Power generation should occur near the end users of the power, this creates a more stable grid.

I hope you will select an alternative to this Project to supply power to the end user, or alternatively, the end user can move their project nearer to the power transmission facility and then West Virginia residents can benefit from additional jobs and there will be no need for this Project. I hope the Board of Managers will elect to terminate this Project and proceed with a different option that is more cost effective, less risky and more environmentally friendly.

*Michael Luster*

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Michael Luster, Ph.D.  
Concern Citizen

February 16, 2025  
The PJM Board of Managers  
Mark Takahashi, Chairman and  
Manu Asthana, PJM President and CEO  
PJM Interconnection L.L.C.  
2750 Monroe Boulevard  
Audubon, Pennsylvania 19408

RE: Opposition to Project 262 2024 Window 1 – (#708) 765kV 261-mile transmission line

I am strongly opposed to Project 262 in the recommended 2024 Window 1 Projects and urge the PJM Board of Managers to reject PJM 2024 Window 1 Project 262 for the reasons stated below:

I. FERC Order 1000 requires competitive bidding:

Project 262 was not competitively bid or awarded. The project is a joint proposal by PJM utilities First Energy, American Electric Power and Dominion developed to bypass competition and control prices. Competition by the utility companies to propose a project that was cost effective for rate payers and include any cost caps was bypassed through a joint project scenario.

2. Brownfield vs. Greenfield: PJM maps incorrectly code the route of the 765kV PATH line as Brownfield utilizing existing easements with paralleling the existing 500kV Dominion Electric line.

PJM has stated this will be a new easement/ROW possibly 200 ft. in width paralleling the existing 500Kv line for the entire 261 Ft. length of the project. The maps need to correctly represent the route as Greenfield.

3. The demand for the power is uncontrolled data center expansion in the State of Virginia, specifically Loudoun County with ratepayers outside of Virginia within the PJM grid system responsible for paying for the construction of this High Transmission Line. State of WV receives no taxes from the Data Centers. In addition the power source is the coal fired John Amos Power Plant in WV which has exceeded the average lifespan for coal fired power plants slated to be retired.

4. PJM's Constructability and Financial Analysis of the project is incomplete with omission of an analysis required for review of land use mapping identifying residences within 100 – 250 feet of the proposed line, conservation easements, public land and historic structures and districts.

5. The landscape through which the line is proposed to be sited has changed dramatically with expansion of existing, buildout of existing, new or platted and approved subdivisions, commercial or industrial sites. The proposed siting at this time follows the PATH 765 kV project that was terminated in 2012 due to strong opposition and tri state coalition between WV, VA and MD.

6. Within Jefferson County in the Eastern Panhandle of WV, since termination of the PATH project, between the Village of Summit Point and Rt. 115 and Mechanicsville the landscape has changed dramatically with loss of farmland resulting in the following:

- Spruce Hill and Spruce Hill North are sister communities comprised of more than 100 homes. The existing 138kV and 500kV goes right through Spruce Hill with houses built right up to the easements.
- Cloverdale – 138 Single Family Homes
- Norborne Glebe – 156 Townhouses, 78 Single Family Homes – Building is right up to the easements.
- Kings Crossing – 71 Townhouses, 35 Single Family Homes
- Blake Wholesale Generation Solar Facility – 80MW; 516 Acres, New Substation connects to the existing 138kV Transmission Line

Additionally Communities, historic properties and commercial along the way will be impacted, to include houses along Summit Point Rd., two historical properties along Summit Point Rd and a thriving destination Commercial property. From Mechanicsville the rebuild of the 138kV line and the new build of the 765kV Transmission Line will continue up the mountain crossing the Appalachian Trail into Virginia.

By paralleling the existing 500kV Transmission line and the rebuild of the 138kV Transmission Line, impacted landowners stand to lose another 300 ft. of width required for new easements. In total an impacted landowner with the Dominion Electric Power Line could end up with a total of 550 ft. width of easement.

The siting of Project 262 Transmission Line recommended in the 2024 Window 1 Projects will cross Harpers Ferry National Park, the Appalachian Trail and the C&O Canal National Park.

7. Project 262 was rated the most risky project for both schedule and constructability risks. During the TEAC meeting this project was considered as they stated they would get More Bang for the Buck! PJM is trying to manage the risk by extending the service date to 2032.

- The in-service date specified for the 2024 Window 1 Projects is 2029. Project 262 (#708) has no chance of meeting a 2029 or 2032 in-service date.
- Neither FirstEnergy, Dominion nor Transource have ever built a 765kv transmission line.
- Guyed wire and V-Lattice towers require a much larger area. Structures of this type are not suitable through the mountains and will not be permitted through agricultural areas or residential areas.
- For all impacted communities in Jefferson County, West Virginia and western Loudoun County, Virginia, construction Project 262 with Guyed wire and V-Lattice Towers parallel to an existing 500 kV High Transmission Line and a third approved new 500kv with a 138kV underbuilt High Transmission Line is nothing short of creating a Toxic Industrial Corridor dead zone that would be unusable by land owners, unsafe with three times the amount of EMF, and void of a minimum 550 ft width of any tree canopy.

I write this as an impacted Landowner who was instrumental in being part of the StopPath Opposition 2009 – 2011/12.

I know the impact to property housing High Transmission Power Lines.

I know the loss of use of deeded acreage of my property

I know the intrusion and loss of usage during power line construction or vegetation management.

I know what it is like to be around High Transmission Power Lines and the resulting EMF and noise.

My primary Doctor, without even knowing I had a power line on my property told me to stay clear of them in that he did not trust the data on power lines.

How do you expect me to consider my land useable and healthy enough to continue my equine farm with three (3) parallel High Transmission Lines on my property to include:

- Existing Dominion Electric 500kV High Transmission Line
- Approved Western Extension of MARL 500kV High Transmission line with 138kV underbuilt line
- Proposed 765 kV High Transmission Line with proposed Guyed wire and V-Lattice Towers

At this time with all the PJM strategizing and approving High Transmission Lines through West Virginia to Loudoun County for uncontrolled Data Center growth, I am in a holding pattern losing the ability to sell my property at Market Value should I chose.

High Transmission power lines from coal fired power plants that were slated to be retired is not the best or only solution to meet the projected energy load in Loudoun County.

We should be spending time on power generated at the site of the Data Centers where the demand is and the County benefits from the Data Center Taxes.

I urge the PJM Board of Managers to reject PJM 2024 Window 1 Project 262 .

Regards,

Robin Huyett Thomas  
Charles Town, WV

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February 17, 2025



The PJM Board of Managers  
Mark Takahashi, Chairman and  
Manu Asthana, PJM President and CEO  
PJM Interconnection L.L.C.  
2750 Monroe Boulevard  
Audubon, Pennsylvania 19408

RE: Transource Project 9-A

Dear Board Members,

The PJM TEAC's recommendation to retain the Transource Project 9-A is an attempt to bail out a suspended project that has spent well over \$100M and has nothing to show for it. The ratepayers you serve deserve better than the continual drain of their funds for zombie projects that remain in suspension year after year. It's time to move on to modern projects that are actually needed, and cancel Project 9-A once and for all.

Originally approved by PJM as a market efficiency project a decade ago, Project 9-A was suspended in 2021 after the Pennsylvania PUC denied a permit for the project. Since then, PJM has determined that Project 9-A will actually cause congestion and reliability issues and its current benefit/cost ratio is 0.81. Project 9A won't even break even and will cost consumers more than it provides in benefits. Just like fish, transmission projects start to stink if they sit around too long. A decade after it's creation, Project 9-A is totally obsolete.

The recent treatment of Project 9-A by the TEAC has lacked transparency and PJM has not followed its own rules, specifically section 1.5.7(f) of Schedule 6 in the Operating Agreement. A suspended project must be reviewed annually and if there are changes in costs and benefits, PJM must review the changes and make a recommendation to PJM's Board of Managers on whether the project should be retained. To be clear, retention of the project is an act of the Board of Managers, not PJM's TEAC.

At the end of 2023, PJM asked for and was granted an extension of time to perform its annual review of Project 9-A. The 2023 evaluation was performed in June 2024 and that review determined that the benefit/cost ratio had changed. However, PJM did NOT bring this change to the Board of Managers for review and decision. Instead, PJM's TEAC made a unilateral decision to retain Project 9-A without consulting the Board. Although questioned thoroughly, PJM staff denied that they were required to consult the Board of Managers in order to retain the project. At the end of 2024, PJM again requested an extension to perform its annual (2024) review of Project 9-A however it was not granted by year's end. Therefore, PJM performed the required annual review using then current data and came up with the same result it found in June 2024. Project 9-A's benefit/cost



ratio is still below the threshold and the project will cause uncontrolled congestion and reliability issues.

However, instead of finally giving up on this dead dog, the TEAC wants to breathe new life into a project that is not needed, reasoning that Transource has spent well over \$100M on the project, and an ongoing court battle may overturn Pennsylvania's denial. It's not because Project 9-A is actually needed, it's to bail out the mistakes both PJM and Transource have made on this project over the past decade. The TEAC is asking the Board of Managers to give them another chance to create a need for Project 9-A. Bailing out unneeded projects and repurposing them to meet new needs is not an effective way to plan the transmission system. Ratepayers are not getting cost effective projects they actually need in such a scenario.

Any reliability reason for Project 9-A should not be enough to revive this Market Efficiency project. If Project 9-A solves some reliability need, then it needs to be bid into a competitive window with other reliability projects, not simply skipped to the head of the line to serve a purpose for which it was never designed. If PJM creates a new market efficiency need for Project 9-A, it should have to compete there also and not be skipped to the head of the line without any competition.

The reality is that court decisions and state approvals cannot make Project 9-A needed again. The benefit/cost ratio is 0.81. The pending court case cannot change that. Transource has spent more than \$100M, but that also cannot change the benefits of this project. The TEAC has claimed that Project 9-A's "B/C ratio = 1.09 when sunk costs are excluded," but has failed to explain why sunk costs should ever be excluded from the ratio when ratepayers are on the hook to pay them. The TEAC should not receive another opportunity to put a little more lipstick on their pig. We already know it's a pig.

The Board of Managers must independently evaluate the TEAC's treatment of Project 9-A over the past several years and order this zombie project to be cancelled once and for all. Ratepayers are already struggling under the enormous financial weight of the numerous projects the Board has approved over the past several years. Reviving Project 9-A just to avoid having to admit PJM has been wrong about this project, and not because there is any need for it, is a totally unnecessary additional burden. You're making energy unaffordable for increasing portions of the population.

Very truly yours,



Patrice Nitterhouse  
Vice President, White Rock Inc.  
Fayetteville, PA 17222

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February 17, 2025

The PJM Board of Managers  
Mark Takahashi, Chairman and  
Manu Asthana, PJM President and CEO  
PJM Interconnection L.L.C.  
2750 Monroe Boulevard  
Audubon, Pennsylvania 19408

RE: 2024 Window 1, Project 262, John Amos – Rocky Point 765kV transmission line

Dear Board Members,

I write to urge you to thoroughly investigate the TEAC's recommendation of Project 262 (also known as Project 708) and to deny approving it at this time. This project was bid and evaluated in a non-competitive manner that is not in compliance with PJM's Manual 14F.

The three largest incumbent utilities in PJM joined forces to create a cartel in order to bid "joint projects" that ensured the companies would not have to bid against each other and compete with their most formidable rivals. As I'm sure you know, a cartel is an association of manufacturers or suppliers with the purpose of maintaining prices at a high level and restricting competition. That's exactly what occurred when Dominion, FirstEnergy and American Electric Power joined forces to control the award of transmission projects in PJM's 2024 Window 1. The companies did not form an independent joint entity before they made their bid. The "joint projects" were and will be individual projects that will be the sole responsibility of one of the three entities. The "joint proposals" did not bid any meaningful cost caps or controls for their projects, but because there were not any competing proposals with cost caps that actually save consumers money, the three incumbents "won" the award and can now form a quasi- joint entity for the sole purpose of being assigned Project 262's individual company components.

In accordance with PJM Manual 14F 8.1.2, PJM is required to perform an in-depth, detailed feasibility review of the constructability of a project it is recommending. This review includes right-of-way acquisition, land acquisition, and siting and permitting requirements. PJM's Constructability & Financial Analysis Report for 2024 Window 1 states that PJM's approach will include land use mapping. The review is supposed to include the following information: Residences within 100 feet (Count); Residences within 250 feet (Count); Land Zoned Conservation (Acres); Rural Legacy (Acres); Program Open Space (Acres); Private Conservation Easements (Acres & Count); Public Land (Acres & Count); Parcels Crossed (Count); Green Infrastructure/Green Acres program (Acres); National Estuarine Research Reserve Project Areas (Acres & Count); Natural Heritage Areas (Acres & Count); Environmental Trust Easements (Acres & Count); Forest Legacy Easements (Acres & Count); and Tidelands. (Page 16 of the Constructability Analysis).

PJM failed to do this analysis at all, despite numerous comments at its TEAC meetings leading up to the Analysis, which informed that hundreds of homes and other buildings were within the proposed new 200-foot wide right-of-way parallel to the existing transmission corridor. PJM ignored the obvious impediments to land acquisition necessary for Project 262 to be constructed as planned. Instead, PJM simply extended the in service date another three years (2032) for this project in its Reliability Analysis Report. Having three additional years to negotiate easements to take homes will not make the destruction of people's homes more palatable.

Project 262 proposes expansion of an existing 250-ft. wide right-of-way by another 200 feet. This same right-of-way is already slated to be expanded by the 502 Junction – Goose Creek 500kV transmission line that was approved as part of 2022 Window 3. Total expansion of this existing right-of-way could be 300 feet or more, creating a transmission superhighway through Jefferson County, West Virginia, that could be up to 600 feet wide. That's nearly two football fields laid end to end! The existing right-of-way through the County has been in place for decades and has been tightly surrounded by new homes, parks, schools and other development. It snakes through new dense housing developments and solar farms that are built right up to the edge of the existing right-of-way. Any expansion at all will cause unacceptable and costly destruction to the orderly development of Jefferson County and the existing built community.

PJM's maps of Project 262 are incorrect. Despite stating in its Constructability & Financial Analysis Report that the project will parallel existing rights-of-way for its entire length, PJM has drawn the project as "using existing right-of-way" on its maps of the project. Using existing right-of-way is entirely different than a parallel line constructed entirely on new right-of-way. As stated above, paralleling existing transmission lines on new easements is often more destructive than greenfield siting because it cannot avoid homes built adjacent to the existing right-of-way.

PJM's risk matrix classification of ROW/Land Acquisition Risk does not recognize the reality of the risks that come with parallel siting. Pure greenfield is NOT more risky because it can be sited to avoid homes and other obstructions. Parallel siting cannot avoid anything in its path and is the riskiest of all. If parallel siting diverges to avoid homes next to the existing right-of-way, it becomes greenfield siting. PJM must update its risk classifications to comport with reality.

Project 262 was rated the highest risk project in the scheduling and constructability categories, and a medium-high risk for ROW/land acquisition. Despite competing projects being deemed much less risky, PJM chose Project 262. What's the point of the risk matrix if PJM ignores it when selecting projects?

PJM's recommendation of two new transmission line projects through Jefferson County, West Virginia, seems to be premised upon the idea that expansion of existing crossings of Harpers Ferry National Park, the Appalachian Trail, and the C&O Canal National Historic Park are preferable to new crossings on a more direct and less destructive route to Virginia's data centers. It is likely that expansion of the existing crossing of the Appalachian Trail on the eastern border of Jefferson County cannot be accomplished due to dense housing on either side of the existing right-of-way on its approach to this crossing. While an expanded crossing to preserve the park may sound good, it is not the best approach when it would also destroy numerous homes on its



approach to the crossing. A much better route could be to site the line to the south and never enter Jefferson County at all. A direct route from the generator to the data centers would parallel Route 7 in Loudoun County, Virginia, and parallel Route 7's crossing of the Appalachian Trail. This more direct route would save miles of unnecessary transmission through Jefferson County and avoid crossing Harpers Ferry National Park and the C&O Canal altogether. PJM does not have jurisdiction to site transmission lines and play political favorites among impacted communities. Its Constructability Analysis should be based on avoidance -- avoidance of homes and avoidance of crossing sensitive national parks that destroy their scenic and historic value. Avoidance of political opposition is not a reason to create circuitous routes that damage disadvantaged communities who have a harder time fighting back.

The Board of Managers needs to recognize that a nearly identical project was proposed and approved back in the mid-2000s. That project was known as the Potomac-Appalachian Transmission Highline (PATH) Project. After garnering a record amount of opposition, PATH was first suspended in 2011, and later cancelled by PJM in 2012. PATH was the subject of one of the longest running abandonment proceedings in history at the Federal Energy Regulatory Commission (FERC). Chairman Mark Christie said that PATH "represented the inherent dangers in approving for regional cost allocation long-distance projects based on a prediction..." and that attention must be paid to the project's demise. He also criticized FERC's overly generous award of transmission incentives to PATH. Restarting the PATH Project (this time with a different name) does not sever it from its austere reputation. Those who fought PATH last time are still here and we are committed to opposing Project 262 through the regulatory, legislative, and political processes it will have to navigate. PJM's attempt to revive this badly planned transmission project is doomed to suffer a fate similar to PATH's.

Project 262 is nothing more than another high-voltage extension cord to connect Virginia's out-of-control data center development with legacy baseload coal generators in West Virginia. The project does not provide any benefit to the ratepayers of West Virginia who will be forced to surrender their homes, land, and scenic views to a new transmission superhighway as wide as two football fields laid end to end. I ask that you not rubber stamp the TEAC's recommendation of this project, which does not comport with PJM's Manual 14F, and reject this project.

Sincerely,

Kervn Newman

Shepherdstown, WV

February 17, 2025

The PJM Board of Managers  
Mark Takahashi, Chairman and  
Manu Asthana, PJM President and CEO  
PJM Interconnection L.L.C.  
2750 Monroe Boulevard  
Audubon, Pennsylvania 19408

RE: Transource Project 9-A

Dear Board Members,

The PJM TEAC's recommendation to retain the Transource Project 9-A is an attempt to bail out a suspended project that has spent well over \$100M and has nothing to show for it. The ratepayers you serve deserve better than the continual drain of their funds for zombie projects that remain in suspension year after year. It's time to move on to modern projects that are actually needed, and cancel Project 9-A once and for all.

Originally approved by PJM as a market efficiency project a decade ago, Project 9-A was suspended in 2021 after the Pennsylvania PUC denied a permit for the project. Since then, PJM has determined that Project 9-A will actually cause congestion and reliability issues and its current benefit/cost ratio is 0.81. Project 9A won't even break even and will cost consumers more than it provides in benefits. Just like fish, transmission projects start to stink if they sit around too long. A decade after it's creation, Project 9-A is totally obsolete.

The recent treatment of Project 9-A by the TEAC has lacked transparency and PJM has not followed its own rules, specifically section 1.5.7(f) of Schedule 6 in the Operating Agreement. A suspended project must be reviewed annually and if there are changes in costs and benefits, PJM must review the changes and make a recommendation to PJM's Board of Managers on whether the project should be retained. To be clear, retention of the project is an act of the Board of Managers, not PJM's TEAC.

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ratio is still below the threshold and the project will cause uncontrolled congestion and reliability issues.

However, instead of finally giving up on this dead dog, the TEAC wants to breathe new life into a project that is not needed, reasoning that Transource has spent well over \$100M on the project, and an ongoing court battle may overturn Pennsylvania's denial. It's not because Project 9-A is actually needed, it's to bail out the mistakes both PJM and Transource have made on this project over the past decade. The TEAC is asking the Board of Managers to give them another chance to create a need for Project 9-A. Bailing out unneeded projects and repurposing them to meet new needs is not an effective way to plan the transmission system. Ratepayers are not getting cost effective projects they actually need in such a scenario.

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The reality is that court decisions and state approvals cannot make Project 9-A needed again. The benefit/cost ratio is 0.81. The pending court case cannot change that. Transource has spent more than \$100M, but that also cannot change the benefits of this project. The TEAC has claimed that Project 9-A's "B/C ratio = 1.09 when sunk costs are excluded," but has failed to explain why sunk costs should ever be excluded from the ratio when ratepayers are on the hook to pay them. The TEAC should not receive another opportunity to put a little more lipstick on their pig. We already know it's a pig.

The Board of Managers must independently evaluate the TEAC's treatment of Project 9-A over the past several years and order this zombie project to be cancelled once and for all. Ratepayers are already struggling under the enormous financial weight of the numerous projects the Board has approved over the past several years. Reviving Project 9-A just to avoid having to admit PJM has been wrong about this project, and not because there is any need for it, is a totally unnecessary additional burden. You're making energy unaffordable for increasing portions of the population.

Very truly yours,

Keryn Newman

Shepherdstown, WV

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February 16, 2024

The PJM Board of Managers  
Mark Takahashi, Chairman and  
Manu Asthana, PJM President and CEO  
PJM Interconnection L.L.C.  
2750 Monroe Boulevard  
Audubon, Pennsylvania 19408

Subject: Project 262 – 765kV 261-mile transmission line across West Virginia

Dear PJM Board of Managers:

I hereby ask you to reject the proposal for the above referenced new 261-mile transmission line across West Virginia. The project will profoundly impact my business.

This project personally affects me and my small business in West Virginia. With a widened right of way and third transmission line on my farm, I would lose pasture acreage critical to feeding and supporting horses that earn our income. I would be forced to permanently downsize my business that would limit our earning potential. I spent the last 13 years building and growing my business in WV and this project will literally rip land and our business growth out from under us. There's no benefit to Jefferson County, WV residents for this transmission line and I will personally suffer financial losses having to downsize and cap my business. I strongly oppose this project.

Very truly yours,

Laura Goddard

[REDACTED]

Charles Town, WV [REDACTED]

[REDACTED]

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Stewards of the Potomac Highlands

PO Box 232

Maysville, WV 26833

<https://potomachighlandstewards.org/>

To: PJM Board of Managers

Feb. 10, 2025

Mark Takahashi, Chair, and Manu Asthana, PJM President and CEO

PJM Interconnection L.L.C., 2750 Monroe Blvd., Audubon, PA 19408

Email c/o [David.Anders@pjm.com](mailto:David.Anders@pjm.com) **Opposition to Project 262 / 7082024 Window 1 –765kV 261-mile transmission line across Virginia and West Virginia**

Stewards of the Potomac Highlands is a citizens environmental group working to preserve and enhance clean water, clean air, and the rural character and locally based economy of West Virginia's eastern panhandle, Potomac Highlands and adjacent counties in Virginia and Maryland.

We are concerned that on Jan. 7, 2025, PJM's Transmission Expansion Advisory Committee (TEAC) revealed it would recommend to PJM's Board of Managers that they approve proposed transmission Project 262. This would include a 261-mile, 765kV transmission line from the John Amos power station in Putnam County, WV to a new substation in Frederick County, MD, to be built by 2029.

This project is nearly identical to the failed Potomac-Appalachian Transmission Highline (PATH) project citizens worked hard to defeat in 2012. It is proposed to cross Jefferson County, WV on its route and take a new 200 ft. wide easement parallel to the existing transmission lines that run through southern Jefferson. This existing transmission line configuration is already targeted for a new 500kV transmission line that was approved by PJM's Board of Managers in December 2023 and would require expansion of the easement.

Both new transmission projects are for the sole purpose of powering new data centers in Northern Virginia. The power isn't for Potomac Highlands and Eastern Panhandle residents, but we would be expected to sacrifice our land and for some, our very homes, and our electric bills would be assessed to pay a portion of the construction.

Here are the reasons why PJM's Board of Managers should not approve Project 262:

- The project was not competitively bid or awarded. PJM utilities FirstEnergy, American Electric Power and Dominion made a joint proposal in order to thwart competition and fix prices. The utilities did not have to compete with each other to propose a project that was cost effective for ratepayers, and the project bid did not include any cost caps.
- PJM's maps of the project claim that the project will be built on existing Easements <https://www.pjm.com/-/media/DotCom/committees-groups/committees/teac/2024/20241203/20241203-item-11---reliability-analysis-update.pdf> But

PJM has stated that it will require a new easement for its entire 261-mile length.

<https://www.pjm.com/-/media/DotCom/planning/rtep-dev/expand-plan-process/ferc-order-1000/rtep-proposal-windows/2024-window-1-redacted-proposals/Proposal-2024-w1-708-redacted.pdf>

- PJM's Constructability and Financial Analysis : PJM's stated process for the analysis required a review of land use mapping that identified residences within both 100 feet and 250 feet of the proposed line, plus identification of conservation easements, public land, and historic structures and districts. To our knowledge, PJM did not perform this analysis.

- Project 262's proposed route crosses through a dense development corridor in Jefferson County and is surrounded by hundreds of homes. These communities would be in jeopardy of condemnation and taking using eminent domain.

- Project 262 was rated the most risky project for both schedule and constructability. PJM's Reliability Report says PJM is attempting to manage this risk by extending In-Service Date to 2032.

- We question the routing through Jefferson County. Would it be easier and cheaper to route it directly to its ultimate connection point in Loudoun County's data center alley?

We even question the need for this project, which would mainly benefit emerging data centers, which gobble water and electricity in order to collect data of our private lives. Chinese methods use less electricity. "Eric Gimon, a senior fellow at the clean energy think tank Energy Innovation, said uncertainty about future electricity demand suggests public utility commissions need to be asking many more questions about utilities' potential projects and should not assume that demand they are planning for will be there."<sup>1</sup> And do we really need them? We urge a risk/cost-benefit analysis.

- The project would cross Harpers Ferry National Park, the Appalachian Trail, and the C&O Canal National Park and can destroy the scenic and historic value of these assets. Could the Project—if necessary at all—be routed alongside existing highways, such as Virginia's Route 7, instead of through residential and National Park properties in Jefferson County?

- The project is an extension cord to export West Virginia's coal-fired electric resources to Virginia, a state with clean energy laws. In W.Va. it will increase pollution and bring higher electric rates on struggling West Virginians without providing any benefits. Stewards plans to join environmental groups in regulatory and political opposition to this project.

We urge the PJM Board of Managers to reject the TEAC's recommendation for Project 262.

Yours truly



Bonni McKeown, president, Stewards of the Potomac Highlands

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<sup>1</sup> <https://www.eenews.net/articles/game-changer-what-deepseek-ai-means-for-electricity/>

February 6, 2024

The PJM Board of Managers  
Mark Takahashi, Chairman and  
Manu Asthana, PJM President and CEO  
PJM Interconnection L.L.C.  
2750 Monroe Boulevard  
Audubon, Pennsylvania 19408

RE: Opposition to Project 262 2024 Window 1 – (#708) 765kV 261-mile transmission line

I am strongly opposed to Project 262 (Proposal 708) of the 2024 Window 1 projects and urge the PJM Board of Managers **to reject** PJM 2024 Window 1 Project 262 .

The impacts of this project, especially Proposal 708 , are intentionally and significantly understated. **The redacted proposal states that the transmission line will require a new 200' easement for its entire 261-mile length** . The map should show a "green" line for the entire length to indicate a new greenfield easement. Marking half "pink" as if it will utilize the existing row is a gross misrepresentation of the land acquisition and property impact.

### 2024W1 – Regional Cluster Preferred Solution: 2024-W1-708

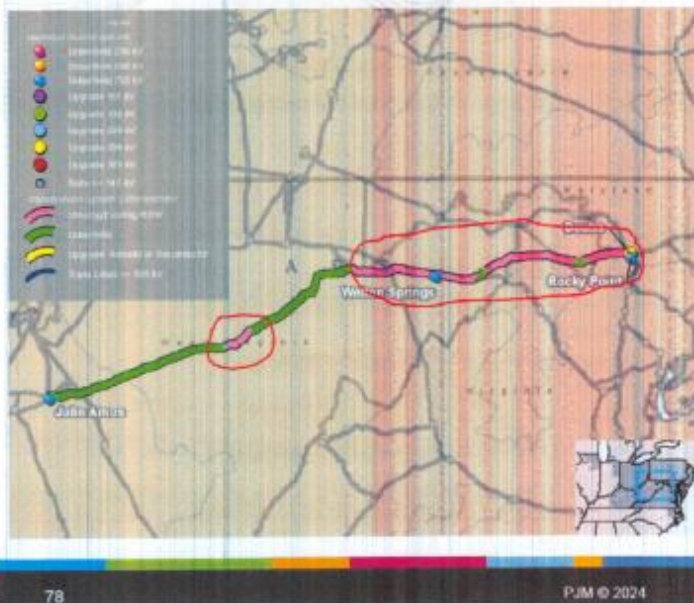


Figure 1: 12/03/2024 PJM TEAC Reliability Update Item 11 pg 78 Proposal

There is NO WAY a 765kV transmission line will fit within the existing ROW. It can't even fit adjacent to the row its will have to "jump" or skirt around existing structures and roads - even then it will destroy many homes. This is a new greenfield easement that will cut a 6,352 acre path of destruction through 14 West Virginia counties, 3 Virginia counties and 1 Maryland county, multiple conservation easements and both state and federal parks.

A Constructability and Financial Analysis of the project was not appropriately performed. No desktop review



was conducted as required. The process for the Constructability and Financial Analysis is listed on PJM RTEP 2024 Window 1 Constructability Analysis Pg.16 - 17 in Figure and Figure 3 below:

- (a) Conduct a desktop review to identify significant barriers that might add additional risk to the project, and determine whether the proposed project area (a study area that is defined for each project) can support the economical construction of the electric transmission and/or substation facilities.**
- The following target information will be referenced by as required and as allowable by available public data sources:
- **National Wetland Inventory mapping from United States Fish and Wildlife Service (USFWS), which will include counts and acreages of:**
    - Total Non-Tidal Wetlands
    - Wetlands of Special State Concern
    - Subaqueous Lands
    - Total Wetlands
    - Non-Tidal (Non-Forested) Wetlands
    - Non-Tidal (Forested) Wetlands
  - **Mapping of specially designated wetlands, streams or rivers, which will include:**
    - Non-Tidal Waterbodies (Count/Acres)
    - 100-Year Flood Plain (Acres)
    - Watershed Boundaries (Count)
    - Outstanding and Exceptional Waters (Count)
    - Wild and Scenic Rivers (Count)
    - United States Geologic Survey Blue Line Streams (Count)
  - **United States Department of Agriculture(USDA)/The Natural Resources Conservation Service (NRCS) Land Cover mapping, which will include acreages of:**
    - Sub-Aquatic Vegetation
    - Forested Uplands
    - Unforested Uplands
    - Agricultural Lands
  - **Land-Use mapping, which will include:**
    - Residences within 100 feet (Count)
    - Residences within 250 feet (Count)
    - Land Zoned Conservation (Acres)
    - Rural Legacy (Acres)
    - Program Open Space (Acres)
    - Private Conservation Easements (Acres & Count)
    - Public Land (Acres & Count)
    - Parcels Crossed (Count)
    - Green Infrastructure/Green Acres program (Acres)
    - National Estuarine Research Reserve Project Areas (Acres & Count)
    - Natural Heritage Areas (Acres & Count)
    - Environmental Trust Easements (Acres & Count)
    - Forest Legacy Easements (Acres & Count)
    - Tidelands

Figure 2: PJM 2024 W1 Constructability and Analysis Report Pg 16: PJM's Constructability Analysis Approach

- Public Lands mapping review, which will include the types, counts and acreages of the following:
  - State/National Forests
  - Natural Areas
  - Preserves
  - Game Lands
  - Recreation Areas
- Cultural Resources mapping review, including the count of previously identified resources, which will include the types, counts, and acreages of the following:
  - Listed and Eligible Historic Structures
  - Listed and Eligible Historic Districts
  - Listed and Eligible Archeological Sites
- Aquatic Resource mapping, including the count of Submerged Historic Resources (if applicable)
- Online distribution data of rare, threatened and endangered species within a 0.5-mile radius of the study area
- Major utility and transportation (roads and rail lines) corridors

Figure 3: PJM 2024 W1 Constructability and Analysis Report Pg 17: PJM's Constructability Analysis Approach continued

As I said before, **Project 262 (Proposal 708) will take at least 6,352 acres of land** from rural property owners across 14 West Virginia counties, 3 Virginia counties and 1 Maryland county. This is in ADDITION to the 500kv transmission line approved in August of 2024 across Jefferson County, West VA and Loudoun County, VA in this same corridor. Homes, farms and businesses will be taken and lives destroyed.

In terms of land use the risk analysis fails to mention that the exact same communities in Jefferson County, West Virginia and Loudoun County Virginia are already being impacted by a 500kv transmission line (Alt MARL Route) approved by the PJM Board in August of 2024

**For these communities, this will be a third transmission tower more massive than the others. Homeowners and property owners in these counties would be forced to live with a massive infrastructure corridor for the sole purpose of providing energy to the data centers speculative business plans. There would be a 500kV plus a the new 500kV that has not been constructed with a 138kV under built plus a 765kV Guyed V-lattice structure beside it.**

Even worse is the use of **guyed V-lattice tower construction - this takes up the most land and is the most land use restrictive structure that could possibly be used.** Farming, mowing, tending, vineyards - agricultural businesses - none of this is doable around guyed V-lattice structures. Guyed V-lattice IS NOT AN ACCEPTABLE STRUCTURE TO BE PROPOSED LET ALONE RECOMMENDED by an entity that claims to have done a "Land Use" analysis.

Project 262 (Proposal 708) also will also impact 32 conservation easements. Plus, **Project 262 (Proposal 708) crosses the Monongahela National Forest, Appalachian National Scenic Trail, Chesapeake & Ohio Canal National Historical Park, Harpers Ferry National Historical Park, Potomac Heritage National Scenic Trail. Again the V-structure and guyed wire proposed will be environmentally destructive to construct.** The 765kV transmission line will also run parallel down the Potomac River, a 765kV transmission line will be the dominant feature of the landscape for miles, - destroying the view shed for every visitor whether they are boating, hiking, biking, taking photographs, ect.. Project 262 will destroy the scenic and historic value of these



assets.

ALL of these parks and scenic areas are also impacted by the 500kv line that was approved in August of 2024, this will significantly decrease the enjoyment of the visitors to these sites. The C&O Canal alone has millions of visitors each year. These parks are frequented by local residents of West Virginia, Maryland And Virginia as well as vacationers for all other states.

The risk analysis fails to consider that Transource, Dominion and First Energy would be simultaneously siting and building a 500kv line with an in-service date of 2032 and the proposed 765kv of Project 262 with an in-service date of 2029 in the same corridor through Jefferson County, WVA and Loudoun County, Virginia.

Additionally, the risk assessment statement on pg 24: "FirstEnergy, including its participation in the joint venture, has significant experience with the proposed equipment and the capabilities to construct Proposal 708 as submitted. The proposing entity experience and capability risk is considered low." is verifiably false. Neither First Energy, Dominion nor Transource have any experience building a 765kV transmission line. None of these companies has ever built a 765kV transmission line. The ONLY utility with any experience building a 765kV line is AEP (American Electric Power), the parent company of Transource.

The properties along the Potomac River are beautiful. This is a scenic rural area along the Potomac River. There are conservation easements and open space, none of these properties are zoned industrial. This is mostly farmland, agricultural businesses and rural homes, orchards and gardens.

My property and the properties and homes of my family members are in the path of these transmission lines. My sister & brother-in-law's home, the homes of two of my nephew's and their families are adjacent to my property and there are two lots which already have wells and septic for the grand-nieces and/or grand nephews. All of this is in the path of this transmission line. This is a rural family subdivision which could very well be destroyed along with the lifestyle they enjoy.

Even with all the missing analysis and understated risk, Project 262 was rated the most risky project for its In-Service Date of 2029 due to both schedule and constructability risks. And further, it was underbid (there is no way it will be permitted to be built with guyed-wires and V frames). The proposal has no cost caps. The Project is a "joint" proposal by a cartel of three incumbent transmission owners who didn't form a separate entity to bid on the project.

***Project 262 is NOT the only solution for transmission nor is transmission the only solution for the data center expansion / projected energy load in Loudoun County, Virginia.***

I urge the PJM Board of Managers to reject PJM 2024 Window 1 Project 262. **Do NOT approve** Project 262.

Sincerely,

Josephine Dellano

Brooklyn 35, NY

February 6, 2024

The PJM Board of Managers  
Mark Takahashi, Chairman and  
Manu Asthana, PJM President and CEO  
PJM Interconnection L.L.C.  
2750 Monroe Boulevard  
Audubon, Pennsylvania 19408

RE: Opposition to Project 262 2024 Window 1 – (#708) 765kV 261-mile transmission line

I am strongly opposed to Project 262 in the recommended 2024 Window 1 projects and urge the PJM Board of Managers to reject PJM 2024 Window 1 Project 262 for the reasons stated below:

1. The impacts of this proposal are intentionally understated. The redacted proposal states that it will require a new 200' easement for its entire 261-mile length. The PJM TEAC and Constructability Analysis should show a "green" line for the entire length of the transmission line. Marking half "pink" implying it will be utilizing the existing ROW is a gross misrepresentation of the land acquisition and property impact. Conspicuously absent from the Constructability Analysis, which was clearly a "cut and paste" from the redacted proposal is the fact that that Proposal 708 of Project 262 will require a new 200' easement for its entire 261-mile length.



2. A Constructability and Financial Analysis of the project was not performed - there is nothing in the analysis that would indicate a desktop review was conducted as required and as stated above it appears to have been cut and pasted from the redacted proposal. Most troubling - PJM failed to do any analysis on Land-Use impacts. Even to the extent of not identifying the number of residences or lots impacted.

The process for the analysis listed on PJM RTEP 2024 Window 1 Constructability Analysis Pg.16 states:

" (a) **Conduct a desktop review** to identify significant barriers that might add additional risk to the project, and determine whether the proposed project area (a study area that is defined for each project) can support the economical construction of the electric transmission and/or substation facilities.

The following target information will be referenced by as required and as allowable by available public data sources:

- National Wetland Inventory mapping from United States Fish and Wildlife Service (USFWS), which will include counts and acreages of:
  - Total Non-Tidal Wetlands
  - Wetlands of Special State Concern
  - Subaqueous Lands
  - Total Wetlands

- Non-Tidal (Non-Forested) Wetlands
  - Non-Tidal (Forested) Wetlands
- Mapping of specially designated wetlands, streams or rivers, which will include:
  - Non-Tidal Waterbodies (Count/Acres)
  - 100-Year Flood Plain (Acres)
  - Watershed Boundaries (Count)
  - Outstanding and Exceptional Waters (Count)
  - Wild and Scenic Rivers (Count)
  - United States Geologic Survey Blue Line Streams (Count)
- United States Department of Agriculture(USDA)/The Natural Resources Conservation Service (NRCS) Land Cover mapping, which will include acreages of:
  - Sub-Aquatic Vegetation
  - Forested Uplands
  - Unforested Uplands
  - Agricultural Lands
- Land-Use mapping, which will include:
  - Residences within 100 feet (Count)
  - Residences within 250 feet (Count)
  - Land Zoned Conservation (Acres)
  - Rural Legacy (Acres)
  - Program Open Space (Acres)
  - Private Conservation Easements (Acres & Count)
  - Public Land (Acres & Count)
  - Parcels Crossed (Count)
  - Green Infrastructure/Green Acres program (Acres)
  - National Estuarine Research Reserve Project Areas (Acres & Count)
  - Natural Heritage Areas (Acres & Count)
  - Environmental Trust Easements (Acres & Count)
  - Forest Legacy Easements (Acres & Count)
  - Tidelands
- Public Lands mapping review, which will include the types, counts and acreages of the following:
  - State/National Forests
  - Natural Areas
  - Preserves
  - Game Lands
  - Recreation Areas
- Cultural Resources mapping review, including the count of previously identified resources, which will include the types, counts, and acreages of the following:
  - Listed and Eligible Historic Structures
  - Listed and Eligible Historic Districts
  - Listed and Eligible Archeological Sites
- Aquatic Resource mapping, including the count of Submerged Historic Resources (if applicable)
- Online distribution data of rare, threatened and endangered species within a 0.5- mile radius of the study area

**Project 262 will take at least 6,352 acres of land from rural property owners across 14 West Virginia counties, 3 Virginia counties and 1 Maryland county. Homes and farms will be taken and lives destroyed. Project 262 will also impact 32 conservation easements. It crosses the Monongahela National Forest, Appalachian National Scenic**



Trail, Chesapeake & Ohio Canal National Historical Park, Harpers Ferry National Historical Park, Potomac Heritage National Scenic Trail and it will run parallel down the view shed of the Potomac River. Project 262 will destroy the scenic and historic value of these assets. ALL of these parks and scenic areas are also impacted by the 500kv line that was approved in August of 2024, this will significantly decrease the enjoyment of the visitors to these sites.

In terms of land use the risk analysis fails to mention that the exact same communities in Jefferson County, West Virginia and Loudoun County Virginia are already being impacted by a 500kv transmission line (Alt MARL Re-route) approved by the PJM Board in August of 2024

**For these communities, this will be a third transmission tower even bigger than the other two - a 500kV plus a the new 500kV that has not been constructed with a 138kV under built plus a 765kV Guyed V-lattice structure beside it! Even worse is the use of guyed V-lattice tower construction - this takes up the most land and is the most land use restrictive structure that could possibly be used.**

3. The risk analysis fails to mention that the exact same communities in Jefferson County, West Virginia and Loudoun County Virginia are impacted by a 500kv transmission line (Alt MARL Re-route) approved by the PJM Board in August of 2024. *It bears repeating, a third transmission tower even bigger than the other two - a 500kV plus a the new 500kV that has not been constructed with a 138kV under built plus a 765kV Guyed V-lattice structure beside it!*

**Transource, Dominion and First Energy would be simultaneously siting and building a 500kv line with an in-service date of 2032 and the proposed 765kv of Project 262 with an in-service date of 2029 in the same corridor through Jefferson County, WVA and Loudoun County, Virginia.**

4. The risk assessment statement on pg 24: "FirstEnergy, including its participation in the joint venture, has significant experience with the proposed equipment and the capabilities to construct Proposal 708 as submitted. The proposing entity experience and capability risk is considered low." is verifiably false.

**Neither First Energy, Dominion nor Transource have any experience building a 765kV transmission line. None of these companies has ever built a 765kV transmission line . The ONLY utility with any experience building a 765kV line is AEP (American Electric Power), the parent company of Transource.**

5. There is NO NIETC transmission corridor here. In fact, the Mid-Atlantic Transmission corridor was CANCELED.

Project 262 will have a devastating effect on property owners all along the route. Homes that are not demolished outright will be seriously devalued and thousands of acres of property will be made worthless! In Loudoun alone, 365 acres is impacted by just Project 262.

I grew up in western Loudoun County, this is a scenic rural area along the Potomac River, mostly farmland, rural homes, orchards and gardens. My parent's home, my Grandparent's home, my Aunt and Uncle's home, my great Aunt's property and two lots which already have wells and septic for the next generation, are all in the path of this transmission line. This is a rural family subdivision which could very well be destroyed. This is three generations, no matter whose property is taken by eminent domain and forced to host these lines we will all be devastated.

Even with all the missing analysis and understated risk. Project 262 was rated the most risky project for its In-Service Date of 2029 due to both schedule and constructability risks. And further, it was underbid (there is no

way it will be permitted to be built with guyed-wires and V frames), it has no cost caps and the proposal is a "joint" proposal by a cartel of three incumbent transmission owners that did not form a separate entity to bid the solution.

*Project 262 is NOT the only solution for transmission nor is transmission the only solution for the data center expansion / projected energy load in Loudoun County, Virginia.*

Once again, I urge the PJM Board of Managers to reject PJM 2024 Window 1 Project 262 . Do NOT approve Project 262.

Sincerely,  
Joseph Ghiorzi

[REDACTED]  
Falls Church, VA [REDACTED]