



**PRESERVE ORANGE ALLIANCE, INC.**

*Nine Counties. One Voice.*

P.O. Box 17

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preserveorangealliance.org

June 2, 2026

PJM Board of Managers  
PJM Interconnection, L.L.C.  
2750 Monroe Boulevard  
Audubon, PA 19403

Re: Request for Reevaluation of the Joshua Falls–Yeat / Valley Link Project

We respectfully request that PJM reevaluate the continued inclusion of the Joshua Falls–Yeat / Valley Link 765 kV transmission project within the Regional Transmission Expansion Plan (RTEP) based on substantial changes and emerging facts that raise serious concerns regarding constructability, permitting feasibility, cost escalation, stakeholder opposition, and prudent continuation under PJM's own planning standards and governing documents.

PJM Manual 14B explains that PJM's transmission planning process culminates in the Regional Transmission Expansion Plan and incorporates baseline reliability reviews, stakeholder input, planning assumptions, and review through the Transmission Expansion Advisory Committee. The evolving circumstances surrounding this project now raise serious questions about whether the project continues to reflect the assumptions, feasibility expectations, and implementation conditions that supported its original advancement within the RTEP process.

In particular, the project no longer appears to reflect the level of routing certainty, permitting viability, stakeholder coordination, or underlying load-growth stability that would ordinarily justify continued advancement of a transmission investment of this magnitude. PJM's planning process relies upon planning assumptions, stakeholder review, and ongoing evaluation of system needs and project development. As material assumptions continue to shift, PJM should carefully consider whether the project, as it now exists, remains consistent with the circumstances and planning considerations that supported its original selection. Failure to undertake such scrutiny risks committing ratepayers to escalating costs tied to a project whose feasibility, schedule reliability, and overall necessity have become increasingly uncertain.

Since initial project approval, the proposal has experienced repeated and material changes. At the same time, the broader projected load-growth forecasts associated with large-scale data-center development in Virginia have become increasingly uncertain. Numerous large-scale data-center projects have reportedly been delayed, scaled back, or canceled, while counties across the Commonwealth are adopting stricter zoning, land-use, and environmental regulations that make future data-center expansion more difficult and less predictable.

These developments raise important questions regarding whether the long-term load assumptions underlying the project remain accurate and whether the scale and urgency of the proposed transmission investment should be reevaluated in light of changing market and regulatory conditions, including:

- Significant route revisions involving new greenfield corridors;
- Changes to proposed landing-point locations;
- Relocation of the Joshua Falls starting point;
- Continued uncertainty surrounding final substation siting and local approval;
- Shifting route alignments across multiple counties;
- Escalating public and governmental opposition across nearly every impacted locality.

Most notably, the project now traverses areas identified by Preservation Virginia as among Virginia's most endangered historic landscapes. This designation substantially increases the likelihood of prolonged regulatory conflict, litigation exposure, permitting delay, mitigation requirements, and escalating project costs.

Additionally, local-government opposition has become widespread and organized. Multiple county Boards of Supervisors along the proposed corridor have formally opposed the project or expressed significant concerns regarding routing, land-use compatibility, agricultural impacts, historic preservation, and property rights. Such opposition materially affects permitting certainty, schedule reliability, and overall constructability risk.

Beyond local-government opposition, PJM should consider the growing likelihood of sustained administrative, regulatory, and judicial challenges. Organized opposition to this project now extends across multiple counties, affected landowners, citizen organizations, historic-preservation advocates, agricultural interests, and local governments. Preserve Orange Alliance is actively coordinating efforts to ensure that all available administrative, regulatory, and judicial remedies are pursued where warranted under state and federal law.

Unlike transmission projects that encounter isolated opposition, the Joshua Falls–Yeat / Valley Link proposal now faces coordinated resistance across nine counties and multiple stakeholder groups. This level of organized opposition creates a substantial risk of prolonged permitting disputes, regulatory proceedings, appeals, and litigation that could materially affect project schedule, constructability, cost, and ultimate feasibility. PJM should carefully consider these factors when evaluating the project's continued inclusion within the RTEP and the prudence of authorizing additional expenditures that may ultimately be borne by ratepayers.

PJM's own planning procedures recognize that significant regulatory and siting developments may warrant reevaluation of projects included in the RTEP. Manual 14B provides for PJM review of the impacts associated with either removing a project from the RTEP or continuing to include it following certain adverse siting outcomes. While the Joshua Falls–Yeat project has not reached that stage, the substantial routing revisions, unresolved siting questions, and increasing implementation risks surrounding the project warrant careful examination before additional expenditures are incurred.

The realistic prospect of years of regulatory and legal challenges is not merely a political consideration; it is a material implementation risk that bears directly on schedule reliability, abandonment-cost exposure, and PJM's obligation to maintain a regional transmission plan consisting of projects that remain reasonably achievable under evolving circumstances.

The continued instability of the proposed routing itself further undermines confidence in the assumptions used during PJM's original planning and approval process. Repeated major routing revisions may themselves indicate unresolved siting constraints incompatible with efficient long-term regional transmission planning. A project that continues to undergo major routing revisions, relocation of its starting point, and changing endpoint assumptions years into development raises legitimate questions regarding whether the currently proposed configuration remains materially consistent with the project originally evaluated within the RTEP framework.

At the same time, abandonment-cost recovery mechanisms continue to allow ongoing expenditure and cost accrual despite growing evidence of permitting uncertainty and implementation risk. Continuing to advance expenditures on a project facing unresolved landing-point approval issues, expanding opposition, substantial route instability, and increasing litigation risk may ultimately expose ratepayers to exceptionally high costs for a project whose viability is increasingly uncertain.

Continuing to accumulate abandonment-cost exposure under conditions of substantial routing instability, permitting uncertainty, and materially evolving planning assumptions may no longer be consistent with PJM's obligation to maintain economically prudent and realistically achievable regional planning.

We therefore respectfully request that PJM:

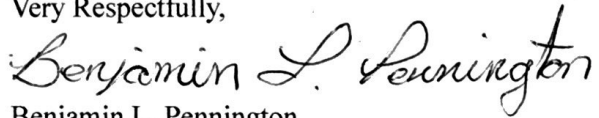
1. Reevaluate whether the project continues to satisfy the assumptions, feasibility expectations, economic-prudence considerations, and planning criteria under which it was originally approved;
2. Assess whether material route and endpoint changes warrant renewed regional review under the RTEP process;
3. Reassess project constructability, permitting feasibility, and schedule reliability in light of mounting local-government, historic-preservation, land-use, and litigation-related obstacles;
4. Consider whether continued abandonment-cost accrual remains prudent given current uncertainty and escalating implementation risk;
5. Determine whether alternative solutions, modified approaches, phased development, or updated load-growth assumptions should be reconsidered before further expenditures are incurred.

PJM's planning responsibilities require not only identifying reliability needs, but ensuring that approved projects remain realistically achievable, economically prudent, and supportable as circumstances materially evolve. The combination of substantial route revisions, unresolved siting questions, increasing local-government opposition, historic-preservation concerns, uncertain load-growth assumptions, and the prospect of prolonged regulatory and judicial

challenges warrants renewed scrutiny of the Joshua Falls–Yeat / Valley Link project under those standards.

PJM's planning procedures acknowledge that project viability may be affected by regulatory, siting, and implementation developments that arise after project approval. We respectfully request that PJM carefully evaluate whether the substantial changes surrounding the Joshua Falls–Yeat / Valley Link project warrant renewed scrutiny before additional costs and risks are imposed upon ratepayers.

Very Respectfully,

A handwritten signature in cursive script that reads "Benjamin L. Pennington". The signature is written in black ink and is positioned above the printed name.

Benjamin L. Pennington

President, Preserve Orange Alliance