



THE COUNTY OF LOUISA, VIRGINIA

June 16, 2026

VIA ELECTRONIC MAIL (David.Anders@pjm.com) AND FIRST-CLASS MAIL

Board of Managers
PJM Interconnection, L.L.C.
c/o David Anders, Secretary, Members Committee
2750 Monroe Boulevard
Audubon, Pennsylvania 19403

Re: Valley Link Joshua Falls–Yeat 765 kV Transmission Line; 2024 RTEP Window 1 Baseline Upgrades; County of Louisa, Virginia

Members of the Board:

Louisa County writes now, before Valley Link files for certification with the Virginia State Corporation Commission, because the project PJM approved in February 2025 is no longer the project Valley Link is presenting to the affected communities. The route has changed and the structures have grown. The County asks the Board to account for that gap before the line advances further on PJM's authority.

The Board approved the Valley Link portfolio as a set of baseline upgrades to redress reliability violations identified for 2029 and 2032. That approval rested on the reliability analysis PJM completed in the 2024 RTEP Window 1 process. It did not rest on the line as Valley Link is now marketing it. At the end of May 2026, Valley Link revised the route, creating a southern endpoint different from the one carried in the approved portfolio. PJM's own Transmission Expansion Advisory Committee record confirms that the Yeat substation location remained under evaluation into 2026, with relocation options still being studied and the supporting reliability studies still to be performed. A project whose terminus and reliability basis were unsettled after Board approval is not the project the Board found necessary.

The structures have also outgrown the record. Valley Link's public materials now depict 765 kV structures of 150 to 175 feet, taller than the figures presented earlier in its outreach and well above the 110 to 135 feet of the existing 500 kV lattice in the corridor. Within a 200-foot right-of-way running roughly twenty miles through Louisa County, that increase is not cosmetic. It enlarges the cleared corridor, the visual footprint, and the proximity impact on the homes the line would pass, many within 500 feet. The County is entitled to know whether PJM evaluated the line at the height now proposed or at the lower profile reflected when the portfolio was approved.

The reliability case for this line rests on load growth that PJM has attributed primarily to data centers in and near the Dominion Zone. Valley Link's public materials describe "growing demand" without naming that driver. The distinction matters. A 765 kV line sized to move surplus generation eastward to

serve data-center load is a project built to a particular forecast, and the County’s residents would bear a permanent burden for demand that arises outside the County and produces no benefit within it. Before the line proceeds, the County asks that PJM make available the load forecast and the reliability findings that the approved portfolio actually rested on, so the affected communities and the Commission can test the need against the project now being proposed rather than the one approved fifteen months ago.

The County also notes the cost exposure carried by projects of this kind. The Commission has authorized incentive rate treatment for Valley Link, including recovery of abandoned-plant costs. The history of comparable 765 kV development in this region includes a project abandoned after substantial stranded costs were charged to ratepayers. Where a project’s route and reliability basis remain in motion after approval, the risk that ratepayers fund a facility that is altered, delayed, or not completed as approved is not theoretical. That risk is a reason for the Board to confirm the present basis for the line before it advances, not after.

The County does not ask the Board to substitute its judgment for the Commission’s on siting, which is the Commission’s charge. The County asks the Board to do what its own process requires: to confirm that the line Valley Link is now advancing, at its current route and current structure height, is the line the reliability analysis supports, and to make the underlying need and reliability record available to the communities that would carry it. If the project has changed materially from what the Board approved, the basis for its continued advancement on the 2024 RTEP approval should be reexamined.

The County submits this letter to the Secretary of the Members Committee under the Board Communications process described in Manual 34, Section 15.4, and asks that it be delivered to the Board and posted to the record of the 2024 RTEP Window 1 proceedings. The County is prepared to provide more detail and welcomes a written response.

Respectfully,



Duane A. Adams, Chairman
Louisa County Board of Supervisors

cc: Dale G. Mullen, Whiteford, Taylor & Preston L.L.P.
Coordinating Counsel, Nine-County Coalition