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District 5 Supervisor

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June 23, 2026

PJM Board of Managers

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

Re: Joshua Falls–Yeat 765 kV Scope Change / 2024 RTEP Window 1 / Buckingham County

Members of the PJM Board of Managers:

On behalf of the Board of Supervisors of the County of Buckingham, Virginia, we write regarding the proposed scope change to the Joshua Falls–Yeat 765 kV transmission project presented at the April 7 and May 8, 2026, meetings of PJM’s Transmission Expansion Advisory Committee. The Board respectfully requests that PJM not approve the proposed scope change without fully addressing the concerns set forth in this letter.

Buckingham County is a rural jurisdiction of approximately 580 square miles in central Virginia. Every alternative route that Valley Link has proposed for the Joshua Falls–Yeat 765 kV line traverses Buckingham County for a greater distance than any other jurisdiction along the project’s entire length. Under every proposed configuration, Buckingham bears the single largest corridor burden of any locality on the route. On April 23, 2026, the Board of Supervisors unanimously adopted a resolution expressing its strong opposition to the project as routed or proposed to be routed through Buckingham County under any of Valley Link’s alternative routes.

The Scope Change Confirms That the Project Design Remains Unsettled.

The TEAC materials presented in April and May 2026 reflect substantial revisions to the previously approved configuration. The Yeat substation has been relocated approximately 15 miles south from its originally contemplated location near Morrisville in Fauquier County into Culpeper County. The 765 kV Greenfield line has been shortened from 156 miles to 115 miles. The 230 kV yard at Yeat has been eliminated. The Vontay switching station has been reduced from a 765/500 kV facility to a 500 kV-only station, and the 765 kV loop through Vontay has been cancelled. Multiple previously approved baseline projects have been cancelled, revised, or replaced with new ones.

The scope of the revisions is not minor. PJM's own materials show redlined changes to project costs across numerous baseline upgrade identifiers, including changes to b4000.355 through b4000.359, b3800.346, b3800.357, b4053.13, b4053.16, and b4053.23, together with five entirely new baseline projects. The aggregate cost impact exceeds \$250 million. A scope change of this magnitude is not an incremental refinement. It is a redesign of fundamental project elements—the terminal location, the corridor length, the substation configuration, and the supporting network of 500 kV interconnections—after PJM Board approval was already granted based on a different design.

Buckingham County is concerned that PJM is being asked to approve a moving target. If the project design was sufficiently mature to support PJM Board approval in 2024, the scope of the changes now proposed calls that maturity into question. If the design was not sufficiently mature, the original approval was premature. In either case, the Board believes that PJM should not approve a further scope change without determining whether the revised configuration has been subjected to the same level of independent planning analysis that supported the original selection.

Buckingham County Receives No Direct Benefit from the Project.

Valley Link has itself acknowledged in public communications that Buckingham County's existing transmission infrastructure is adequate to serve the County's own electricity needs. The project does not propose to serve Buckingham County customers. The demand driving the project is concentrated in jurisdictions in Northern Virginia and is attributable in significant part to data center load growth—a single industry sector whose growth projections have shifted substantially since 2022. The elimination of the 230 kV yard at Yeat in the revised scope further confirms that the project has no local load-serving function for the communities along the corridor.

Buckingham County is being asked to bear the greatest physical burden of any locality on the route for a project that serves other jurisdictions. The Board believes that PJM's planning process should account for the disproportionate allocation of impacts and benefits when evaluating scope changes of this nature.

Buckingham County Already Bears a Substantial Regional Infrastructure Burden.

The County already accommodates a high-voltage transmission corridor along its eastern boundary. Dominion Energy is constructing or upgrading a transmission line along the County's southern boundary to serve a data center in Appomattox County. A gas-fired electric generating plant is planned in Cumberland County on Buckingham's eastern border. Existing pipeline rights-of-way also traverse the County. The proposed Valley Link corridor would add a 765 kV extra-high-voltage line through the interior of a county that is already contributing more than its share to regional energy infrastructure.

Alternatives Have Not Been Adequately Evaluated.

The scope change relocates the terminal substation and shortens the corridor, but the TEAC materials do not reflect a comprehensive evaluation of alternative routes that would follow existing transmission and pipeline corridors rather than cutting new Greenfield rights-of-way through Buckingham County. Nor do the materials address underground placement of the transmission line as a mitigation measure, particularly in the view shed-sensitive areas of the County where above-ground 765 kV structures would cause severe and irreversible harm to the rural character and scenic landscapes valued by the County's citizens.

The Board notes that the proposed scope change was driven in part by siting difficulties at the originally contemplated northern terminal location. That experience should inform PJM's evaluation of the revised route through Buckingham County, where the Board of Supervisors has formally opposed the project, landowners have not been consulted, and the same categories of siting conflict—environmental, historical, agricultural, and community impact—are present in equal or greater measure.

The Required In-Service Date Does Not Establish Feasibility.

The TEAC materials continue to reflect a required in-service date of June 1, 2029. The Board is not aware of any analysis demonstrating that the revised project can be permitted, routed, acquire rights-of-way, obtain state regulatory approval, and be constructed within that timeframe given the formal opposition of multiple host counties, the absence of any Virginia State Corporation Commission proceeding, and the foreseeable litigation that a project of this scale and controversy will generate. A required in-service date is a planning assumption, not a construction schedule. PJM should not treat the two as interchangeable when evaluating whether to approve a scope change for a project whose siting remains contested.

The Board is also aware that PJM has previously removed major approved transmission projects from the RTEP when planning assumptions or reliability drivers changed, as occurred with the Potomac–Appalachian Transmission Highline and the Mid-Atlantic Power Pathway. Prior RTEP selection does not make a project immutable, and PJM should not treat it as a substitute for current feasibility review.

Requests.

For the foregoing reasons, the Board of Supervisors of Buckingham County respectfully requests that PJM:

1. Decline to approve the proposed Joshua Falls–Yeat scope change until the revised configuration has been subjected to a level of independent planning analysis commensurate with the magnitude of the design changes;
2. Require Valley Link and Dominion to provide a complete analysis of alternative routes that maximize the use of existing transmission and pipeline corridors and minimize new greenfield rights-of-way through Buckingham County;
3. Require an evaluation of underground placement of the 765 kV line within Buckingham County, particularly in view shed-sensitive areas;
4. Require a realistic feasibility assessment addressing permitting timelines, right-of-way acquisition, state regulatory proceedings, and foreseeable litigation, rather than treating the stated 2029 in-service date as a basis for urgency;
5. Address the disproportionate allocation of corridor burden to Buckingham County, which bears the longest segment of any jurisdiction on the route while receiving no direct benefit from the project;
6. Enter this letter and the Buckingham County Board’s resolution of April 23, 2026, into the record considered by PJM staff and the PJM Board of Managers before any vote on the proposed scope change.

Buckingham County does not oppose reliable electric service or sound regional transmission planning. The Board opposes a planning process that asks one rural county to absorb the greatest physical impact of a billion-dollar project designed to serve other jurisdictions, without adequate evaluation of alternatives, without any demonstration of local benefit, and on the basis of a project design that has changed fundamentally since it was approved.

The Board asks that PJM give this letter and the County's concerns the consideration they are due.

Very truly yours,

A handwritten signature in black ink, reading "Joe N. Chambers Jr." with a horizontal line underneath.

Chair, Board of Supervisors
County of Buckingham, Virginia

Enclosure: Buckingham County Board of Supervisors Resolution of April 23, 2026

**COUNTY OF BUCKINGHAM, VIRGINIA
BOARD OF SUPERVISORS**

RESOLUTION

**A RESOLUTION OF THE BOARD OF SUPERVISORS OF THE COUNTY OF BUCKINGHAM,
VIRGINIA, EXPRESSING STRONG OPPOSITION TO THE PROPOSED VALLEY LINK
765-KILOVOLT ELECTRIC TRANSMISSION LINE AS ROUTED OR PROPOSED TO BE
ROUTED THROUGH
BUCKINGHAM COUNTY; ASSERTING THE COUNTY'S RIGHTS IN ANY PROCEEDING
BEFORE THE VIRGINIA STATE CORPORATION COMMISSION; AND DIRECTING
APPROPRIATE ACTIONS TO PROTECT THE INTERESTS OF THE COUNTY AND ITS
CITIZENS**

WHEREAS, the County of Buckingham, Virginia (the "County") is a rural jurisdiction of approximately 580 square miles in central Virginia, whose character, economy, and quality of life are significantly defined by its agricultural lands, forested landscapes, rural viewsheds, and natural environment, all of which are valued resources of the County and its citizens, and

WHEREAS, Valley Link, LLC or its successor entity ("Valley Link") has proposed the construction of a 765-kilovolt (kV) extra-high-voltage electric transmission line (the "Project") intended to traverse a multi-jurisdictional corridor in central and northern Virginia, and Valley Link has identified multiple alternative routes for the Project through Buckingham County, and

WHEREAS, each of the alternative routes proposed by Valley Link for the Project traverses Buckingham County for a greater distance than any other jurisdiction through which the proposed line would pass, and each such route would effectively bisect the County from one boundary to another, imposing upon the County the single largest corridor burden borne by any locality along the Project's entire length regardless of which alternative is selected, and

WHEREAS, the Project as proposed under any of Valley Link's alternative routes would require the clearing of substantial forested and agricultural land within Buckingham County, would permanently alter the rural viewsheds and natural landscapes that define the County's character and support its agricultural and rural economy, would depress property values along and adjacent to the proposed corridor, and would impose construction impacts, electromagnetic effects, and long-term land encumbrances on County landowners and communities for the benefit of electricity consumers in other jurisdictions, and

WHEREAS, the Board has been advised that Valley Link has itself acknowledged, in public communications to adjacent jurisdictions, that Buckingham County's existing transmission infrastructure is adequate to serve Buckingham County's own electricity needs, confirming that the Project does not propose to serve Buckingham County customers and that the County receives no direct electricity supply benefit from the Project as designed and proposed under any of its alternative routes, and

WHEREAS, the demand for additional transmission capacity that the Project is intended to address is concentrated in jurisdictions other than Buckingham County, is driven in significant part

by explosive growth in large-scale data center operations in those jurisdictions, and has been projected based on load forecasts that reflect a degree of speculative growth in a single industry sector that has occurred almost entirely since 2022, and

WHEREAS, Buckingham County already accommodates a high-voltage transmission corridor along its eastern boundary and is further affected by a Dominion Energy transmission line being constructed or upgraded along its southern boundary to apparently serve a data center in Appomattox County, and a gas-fired electric generating plant is planned in Cumberland County on Buckingham's eastern border, and existing pipeline rights-of-way also traverse the County and could potentially be co-located with transmission infrastructure if the existing southern and eastern boundary corridors are not utilized, such that Buckingham County and its citizens are already bearing a substantial and growing share of the regional energy infrastructure burden, and

WHEREAS, Valley Link has not demonstrated that it has adequately studied or considered underground placement of the proposed transmission line as a means of mitigating adverse impacts on Buckingham County, and underground placement is a technically feasible alternative that should be evaluated particularly in viewshed-sensitive areas of the County where above-ground 765-kV transmission structures would cause severe and irreversible harm to the rural character and scenic landscapes valued by the County's citizens, and

WHEREAS, the Virginia State Corporation Commission (the "SCC") has exclusive authority under Virginia law to approve or deny a Certificate of Public Convenience and Necessity ("CPCN") for high-voltage transmission projects of this type, and the Board acknowledges that the final approval decision rests with the SCC and not with local government; the County's opposition is therefore directed at ensuring that the SCC's independent review is complete, rigorous, and fully informed by the disproportionate burden that each of Valley Link's proposed alternative routes places upon Buckingham County, and

WHEREAS, Virginia Code § 56-265.2 requires the SCC to independently determine that a proposed transmission facility is needed before a CPCN may issue, and the Board believes that the need for this Project as routed through Buckingham County under any of the proposed alternatives has not been adequately demonstrated, that PJM Interconnection's regional planning approval does not satisfy the SCC's independent need-verification obligation, and that the SCC should require Valley Link to make a rigorous and independent showing of necessity before any CPCN is granted, and

WHEREAS, Virginia Code § 56-46.1 requires the SCC to consider whether a proposed transmission facility has been routed to minimize adverse impacts on localities, landowners, and the natural environment, and the Board believes that none of Valley Link's proposed alternative routes through Buckingham County satisfies this standard because each imposes maximum corridor length and maximum adverse impact on one jurisdiction while providing that jurisdiction with no compensating benefit, and because viable alternative routes following existing transmission and pipeline corridors — including corridors along the County's eastern and southern boundaries — have not been fully and independently evaluated, and because Valley Link has not demonstrated that underground placement of the transmission line, particularly in viewshed-sensitive areas, has been adequately studied as a means of minimizing adverse impacts, and

WHEREAS, Buckingham County, as an affected local government with a substantial interest in the outcome of any SCC proceeding concerning the Project, has the right to intervene as a formal party of record in such proceeding, and the Board intends to preserve and assert that right, and

WHEREAS, the Board's objectives in connection with the Project are: (1) to ensure that any claimed need for the Project as routed through Buckingham County under any proposed alternative is rigorously and independently verified before SCC approval; (2) to require that alternative routes, including routes that would follow existing transmission and pipeline corridors and reduce the Project's impact on Buckingham County, be fully evaluated; (3) to require that underground placement of the transmission line be evaluated as a mitigation measure, particularly in viewshed-sensitive areas of the County; (4) to minimize the environmental, agricultural, viewshed, and property value impacts on Buckingham County and its citizens; and (5) to ensure that if the Project is ultimately approved and constructed, Buckingham County receives appropriate and commensurate economic development and community benefit in recognition of the disproportionate burden it bears, and

WHEREAS, nothing in this Resolution shall be construed to constitute a waiver of any legal right of Buckingham County, to preclude the County from engaging in good-faith communications with Valley Link or its representatives, or to limit the County's ability to participate in any regulatory proceeding in any capacity the Board may subsequently direct, and

NOW, THEREFORE, BE IT RESOLVED

by the Board of Supervisors of the County of Buckingham, Virginia, in regular session assembled, as follows:

The Board of Supervisors of the County of Buckingham, Virginia, hereby expresses its strong opposition to the proposed Valley Link 765-kV electric transmission line as routed or proposed to be routed through Buckingham County under any of Valley Link's alternative routes. The Board opposes the Project because each proposed alternative route imposes the greatest corridor burden of any jurisdiction along the Project's length upon a rural county that receives no direct electricity supply benefit from the Project, and because the need for the Project as specifically routed through Buckingham County has not been demonstrated to the satisfaction of the Board.

BE IT FURTHER RESOLVED that the County of Buckingham hereby asserts and expressly reserves all rights available to it under Virginia law, including without limitation the right to intervene as a formal party of record in any proceeding before the Virginia State Corporation Commission in which a Certificate of Public Convenience and Necessity for the Project or any related transmission facility is sought, and the right to present evidence, conduct discovery, and advance legal argument in any such proceeding;

BE IT FURTHER RESOLVED that the Board requests that Valley Link, LLC and its representatives provide the Board of Supervisors with a formal briefing on the proposed Project, the basis for the current route selection, the alternatives that have been considered, and citizens, and that such briefing be arranged through the County Administrator;

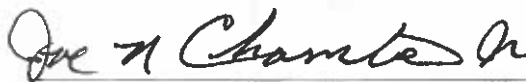
BE IT FURTHER RESOLVED that the Board declares that it is the policy of the County of Buckingham that any approval of the Project by the Virginia State Corporation Commission should be accompanied by: (a) a rigorous independent demonstration of need for the Project as specifically

routed through Buckingham County under any proposed alternative; (b) a full and independent evaluation of alternative routes, particularly routes following existing transmission and pipeline corridors, that would minimize adverse impacts on Buckingham County; (c) a full evaluation of underground placement of the transmission line as a mitigation measure, particularly in viewshed-sensitive areas of the County; (d) meaningful conditions addressing environmental protection, agricultural land preservation, viewshed mitigation, and property value impacts; and (e) a community benefit agreement or equivalent commitment that provides Buckingham County with economic development and community investment commensurate with the disproportionate burden the Project's routing places upon it;

BE IT FINALLY RESOLVED that the Clerk of the Board is directed to transmit a certified copy of this Resolution to the Governor of Virginia, the Virginia Congressional delegation, the members of the General Assembly representing Buckingham County, with a requests for such delegation to meet with the Board to advise of their position and how it relates to the County's position, the Chairman of the Virginia State Corporation Commission, Valley Link, LLC, and such other persons and agencies as the County Administrator may determine to be appropriate.

ADOPTED by the Board of Supervisors of the County of Buckingham, Virginia, at a regular meeting duly held on the 23rd day of April, 2026, by the following vote:

AYES:	6
NAYS:	
ABSTAINING:	
ABSENT:	1



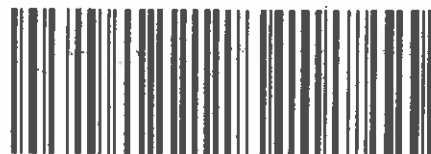
Chair, Board of Supervisors
County of Buckingham, Virginia



Clerk, Board of Supervisors
County of Buckingham, Virginia

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