

Letters Received as of July 10, 2026 Regarding Proposed Transmission Upgrades

The following emails 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.

From: Christie

Sent: Monday, May 11, 2026 4:18 PM

To: Anders, David <David.Anders@pjm.com>

Subject: JF - Y scope change and transmission planning

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To the PJM Board of Managers,

I am writing as a Virginia resident closely following the Joshua Falls–Yeat 765 kV transmission project and the recent revisions presented during the April and May 2026 TEAC meetings.

After reviewing the redlined PJM materials, I am concerned by the scale of the revisions now being made to a project that was previously presented as a defined and approved transmission solution.

The recent TEAC materials reflect substantial changes, including:

- Relocation of the proposed Yeat substation approximately 15 miles south into Culpeper County
- Shortening of the proposed greenfield 765 kV corridor from approximately 156 miles to 115 miles
- Removal of the originally proposed 230 kV yard at Yeat
- Revisions to multiple 500 kV interconnections
- Cancellation or modification of previously approved supporting projects

These do not appear to be minor adjustments. They raise legitimate questions regarding how settled the underlying planning assumptions, routing concepts, infrastructure needs, and projected load forecasts actually are.

PJM has stated these revisions are intended to improve schedule certainty, reduce impacts, and lower costs. However, from a public perspective, the evolving scope of the project raises important concerns regarding transparency and long-term planning stability.

I respectfully ask the PJM Board to provide greater public clarity regarding:

- What specific changes in projected load growth or system modeling prompted these revisions
- Whether existing transmission corridors and infrastructure were fully evaluated before continuing to advance new greenfield 765 kV corridors
- How the revised configuration changes projected impacts to rural communities, farmland, forests, homes, and existing utility corridors
- Whether additional significant scope or routing revisions are still anticipated prior to any SCC filing
- How PJM evaluates whether continuing project revisions indicate unresolved planning assumptions or uncertainty within the overall transmission strategy

Residents across Virginia are trying to understand how decisions of this scale continue to evolve while communities remain under uncertainty regarding potential impacts to private property, land use, and local infrastructure.

I appreciate your consideration and respectfully ask the Board to continue encouraging transparency and meaningful public engagement as this project moves through the RTEP process.

Sincerely,

Christie Payne

Goochland County, Virginia

Jill King

Kents Store, VA 23084

May 12, 2026

PJM Board of Managers

PJM Interconnection L.L.C.

2750 Monroe Boulevard

Audubon, PA 19403

Subject: Comment on Joshua Falls–Yeat Scope Change and Transmission Planning

Dear Members of the Board,

As a Goochland County, Virginia property owner, I am writing to express deep concern regarding the ongoing instability and shifting scope of the Joshua Falls–Yeat 765 kV project. The extensive revisions presented at the April and May 2026 TEAC meetings—including the relocation of the Yeat substation and the fundamental reconfiguration of 500 kV and 765 kV infrastructure—suggest that this project remains in a state of speculative flux.

These changes raise serious questions regarding the validity of the original planning assumptions. When a project of this magnitude undergoes such drastic redesign, it creates significant uncertainty for the landowners and communities across Virginia. We are left asking: if the scope can shift this dramatically in a matter of months, how can the public or the Board have any confidence in the current justification for this 115-mile corridor?

I request that the Board provide transparency regarding the following:

- Need: What specific data drove these massive revisions, and why is this infrastructure still being prioritized over the utilization of existing corridors?
- Accountability: How will the Board ensure that infrastructure impacts are not simply being displaced onto other communities, such as those near Morrisville, as the project evolves?
- Stability: Why should the public accept these latest revisions as "settled" when they clearly demonstrate that the underlying planning process is still failing to provide a finalized, reliable scope?

The residents of Virginia deserve a planning process grounded in necessity and reality, not constant, disruptive redesigns. I urge the Board to exercise rigorous oversight and demand meaningful justification before any further advancement of this project.

Respectfully,

Jill King

Goochland County Property Owner

From: Anna Ahlbin

Sent: Thursday, May 28, 2026 10:50 AM

To: Anders, David <David.Anders@pjm.com>

Subject: Comment on Scope Change – Joshua Falls–Yeat (2024 RTEP Window 1)

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To: The PJM Board of Managers

Re: Joshua Falls to Yeat

I write today as an affected and concerned resident of Orange County, regarding the planned Valley Link Joshua Falls to Yeat proposed 765kV transmission line.

As you know, Dominion and Valley link group released their newest iteration of proposed routes yesterday, but included in this release was a seemingly undisclosed change to the Joshua Falls substation placement in Campbell county. While the initial proposal was for

an expansion to the existing Joshua Falls substation, now a relocation is being proposed. Dominion states: **“Due to space constraints, the existing Joshua Falls Station is proposed to be relocated. The relocation and associated work will be completed under a separate Appalachian Power project with a separate filing to be submitted to the SCC.”**

Given that the current routing of the Joshua Falls-Yeat line is **already in question** due to the **Culpeper Board of Supervisors' resolution to oppose the substation** at the Northern Terminus of the proposed line, adding another major and material change at the origin of the line **clearly represents a major and known scope change**. If the 2024 W1 approval was based on expanding the existing Joshua Falls substation, but the project now uses a relocated terminal site on a different parcel, then that raises a basic question: **why is this not also being evaluated as a material scope change?** PJM is already evaluating the proposed Yeat relocation and scope change. The PJM Board **should also evaluate whether the starting point of this line has materially changed, and what that means for constructability, cost, feasibility, land acquisition, and the claimed 2029 in-service date.**

We may now have “floating” substation questions at **both** ends of this line, with every county in the middle left holding its breath. **How can PJM approve a project that appears materially different from what was approved in the 2024 Window 1 RTEP and increasingly unlikely to meet the required 2029 in-service date? Why is PJM not evaluating scope changes for both the Joshua Falls substation and the Yeat substation? How is PJM assessing the risk if Campbell County responds negatively to a new or relocated substation, as citizens intend to encourage them to do?**

Given the incredibly potentially negative impact this project has on so many residents of Central Virginia, **PJM has an obligation to answer these questions** and truly address the material and scope changes of this project, **AND** to provide real clarity to citizens as to the **true plans and scope of this project.**

If PJM approves the scope change without addressing these issues, we will ensure the record reflects that these concerns **were not newly discovered later**. They were raised **before approval**, while PJM still had the opportunity to **require further review, clarification, or disapproval of the revised project**, and we expect to see them addressed.

Respectfully

Anna M. Ahlbin

“If the world is against the Truth, then I will be against the world.”
— Saint Athanasius

From: Joseph Patrick Anthony
Sent: Thursday, May 28, 2026 2:49 PM
To: Anders, David <David.Anders@pjm.com>
Subject: Comment on Scope Change – Joshua Falls–Yeat (2024 RTEP Window 1)

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Dear PJM Board Of Managers,

I have to wonder how you can approve this project which is now materially different than what was approved in the 2024 Window 1 RTEP. It is increasingly unlikely that the project will meet the required 2029 in-service date. Are you evaluating scope changes for the Joshua Falls and the Yeat substations? If not, why not? Further, how do you assess the risk if Campbell County responds negatively to a new or relocated substation?

I request that my comment be provided to the PJM Board Of Managers before the July vote on the Joshua Falls - Yeat scope change. Also, if you approve the scope change before addressing these issues, the record should reflect that they were not newly discovered later. They were raised before approval, while PJM still has the opportunity to require further review, clarification, or disapproval of the revised project.

Thank you,

Joseph Anthony

Buckingham, VA

-----Original Message-----

From: Logan Shupe

Sent: Saturday, June 6, 2026 4:19 PM

To: Customer Service (Internet) <custsvc@pjm.com>

Subject: Opposition To Valley Link; please FWD to Board of Managers

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To whom it may concern,

I would like to express my opposition to the Valley Link project in Appomattox County. I feel this directly affects my family as these lines are encroaching on the only area my young children have to play as well as running directly through many of our local farmers land without their permission. Our community in Appomattox has been very open about the opposition to this project, yet all that has been done is a reroute of the existing line to different areas that are still within our community.

I request that this email be forwarded to the PJM Board of Managers for review ASAP

Thank you,

Logan Shupe, resident of Appomattox County

Sent from my iPhone

From: dcaswual@aol.com

Sent: Thursday, June 4, 2026 10:01 PM

To: Customer Service (Internet) <custsvc@pjm.com>

Cc: Jill King

Subject: Formal Opposition to the Joshua Falls-Yeat Transmission Line Proposed Route

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To: PJM Board of Managers

Re: Formal Opposition to the Joshua Falls-Yeat Transmission Line Proposed Route

As a property owner in Goochland County, I am writing to formally express my deep opposition to the current route of the Joshua Falls-Yeat Transmission Line. The “Blue Line” alternative, which places this massive infrastructure project within just 0.25 miles of my home, is entirely unacceptable.

The proximity of this project to my residence poses a direct risk to my health. Given the documented concerns regarding electromagnetic fields (EMF) and the associated negative health outcomes linked to high-voltage transmission lines, the presence of these towers would effectively destroy the habitability of my home. I would be forced to sell my property and relocate, incurring personal, financial, and emotional costs for which I hold this project directly responsible.

Beyond the personal devastation, the current proposal is a failure of planning and civic respect. The scope changes introduced since February 2025 demonstrate that the project’s original justification is flimsy and reactive. A project of this magnitude, which

faces unified opposition from nearly every locality along its path—including the clear resolution of opposition from the Culpeper County Board of Supervisors—is fundamentally flawed. PJM is continuing to push a plan that relies on the massive seizure of private land and the destruction of Virginia’s natural beauty, ignoring the viable, less destructive alternatives that represent true utility planning.

If PJM is capable of selecting underground transmission solutions that utilize existing rights of way—as seen in other recent initiatives—why is this project being forced through greenfield land at such a high cost to citizens? The scale of community resistance and the necessity of local government approval for vital infrastructure like the Yeat and Joshua Falls substations raise serious questions about the validity of your three-year in-service timeline.

I urge the Board of Managers to reject the current scope of this project. It is incumbent upon you to seek alternatives that protect the property rights and health of Virginians rather than prioritizing the path of least resistance for corporate interests.

I expect this feedback to be part of the official record for your upcoming review.

Respectfully,

Jill King

Kents Store, VA

Coochland County, VA

From: Patrick Oxenham

Sent: Thursday, June 4, 2026 4:38 PM

To: Customer Service (Internet) <custsvc@pjm.com>

Subject: Comments for PJM Board of Managers Regarding Joshua Falls–Yeat Re-Approval

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To the PJM Board of Managers,

I am writing regarding the pending review of scope changes to the Joshua Falls–Yeat 765 kV transmission project.

I understand PJM's role is not to select the final route. However, PJM is responsible for evaluating whether projects remain feasible and appropriate as they evolve through the planning process. I believe the substantial changes that have occurred since this project was approved warrant careful review before any re-approval is granted.

One of the primary reasons public opposition continues to grow is that many residents have come to realize that the project being advanced today appears fundamentally different from the transmission planning principles PJM itself emphasized when identifying the need. PJM's 2024 planning materials discussed minimizing impacts through the use of existing utility corridors and other already disturbed areas where feasible. Yet the current proposal is overwhelmingly new greenfield construction through previously undisturbed rural landscapes.

This distinction matters.

Too often discussions about impacts are reduced to a simple comparison of acreage affected. A transmission line crossing an existing utility, transportation, or industrial corridor is not equivalent to cutting a new 200-foot-wide corridor through forests, farms, wetlands, wildlife habitat, and residential properties that have never before been fragmented by major infrastructure. These are not apples-to-apples impacts.

A project of this size and scale should be evaluated not only on engineering feasibility and cost, but also on how effectively it minimizes the creation of new greenfield corridors. From what many landowners have observed, cost minimization appears to have become the dominant factor while the burden of those savings is being shifted disproportionately onto rural Virginia communities.

As an affected Buckingham County landowner, I have personally witnessed routes being revised multiple times as additional information and public input are provided. The fact that substantial route changes continue to occur demonstrates that significant questions remain unresolved. It also raises a broader concern regarding whether the project is sufficiently mature to support confidence in the current schedule and in-service timeline.

Equally concerning is that many residents perceive a disconnect between the project's stated objective of minimizing impacts and the routing outcomes that have emerged. Across the corridor, people see existing transportation corridors, utility corridors, pipelines, and other disturbed landscapes that appear to receive less consideration than entirely new greenfield routes. Whether that perception is accurate or not, it has become a major driver of public distrust and opposition.

The increasing resistance to this project is not simply a reaction to transmission infrastructure itself. Many Virginians understand that new infrastructure will be needed to support growth and maintain reliability. Rather, the resistance stems from a belief that the burden of this project is being placed disproportionately on rural communities while opportunities to reduce new greenfield impacts have not been fully exhausted.

I respectfully ask PJM to carefully consider whether the current proposal remains consistent with the planning objectives that supported its original selection, whether sufficient consideration has been given to alternatives that would reduce greenfield impacts, and whether the project's timeline remains realistic given the substantial routing changes, county government opposition, ongoing community concerns, and continuing evolution of the proposal.

Projects of this magnitude will shape Virginia's landscape for generations. They should be planned in a manner that minimizes unnecessary greenfield impacts, maximizes the use of existing corridors where feasible, and fairly balances reliability needs with the interests of the communities asked to host them.

Thank you for your consideration.

Sincerely,

Thomas "Patrick" Oxenham

Buckingham County, Virginia

-----Original Message-----

From: Abi Morris

Sent: Wednesday, June 3, 2026 8:09 PM

To: Customer Service (Internet) <custsvc@pjm.com>

Subject: Joshua Falls Yeat Transmission line

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Dear Board,

I would like to submit my comments for your consideration on Dominion's proposed Joshua Falls-Yeat Transmission line.

I don't believe Dominion's plans work for the good of Virginians, and I don't believe, with as much contest as it is facing from all the residents of the 9 counties it aims to run through, that it should continue its way.

I believe there are other ways for Dominion to come up with the power it needs to feed data centers in northern virginia, and bulldozing farmland, homeland, and beautiful rural land through 9 counties is not the way.

Please consider the timeline, the method, and the humanity of this situation.

Thank you,

Abigail Morris

Goochland resident

Virginia.

From: Christie

Sent: Saturday, June 6, 2026 3:10 PM

To: Customer Service (Internet) <custsvc@pjm.com>

Subject: Request for PJM Board Review of Scope Changes to the Joshua Falls–Yeat Transmission Project

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To Whom It May Concern,

Please forward this email to the PJM Board of Managers regarding its pending review of scope changes to the Joshua Falls–Yeat transmission project.

My name is Christie Payne. I am a resident of Goochland County, Virginia, and one of thousands of citizens who have spent months researching this project, attending meetings, reviewing maps, and trying to understand the true scope of what is being proposed.

Since PJM selected this project, significant changes appear to have occurred. The route has been substantially modified, the overall corridor length has changed, proposed facilities have changed, and citizens have recently learned that the project may no longer begin at the existing Joshua Falls substation. Instead, maps now appear to show a proposed new substation location that would require additional approvals and land acquisition.

These are not minor adjustments. They raise important questions about whether the project being reviewed today is the same project that PJM originally approved.

I respectfully ask PJM to consider whether the project's timeline remains realistic given the level of public opposition and the numerous obstacles that remain.

County governments representing much of the project corridor have expressed opposition. Culpeper County has adopted a resolution opposing the project and has authority over the proposed Yeat substation location. Campbell County may be required to review a new

Joshua Falls substation location. Thousands of acres of private property may still need to be acquired through negotiation or eminent domain.

As a citizen, I also question whether sufficient consideration has been given to alternatives that could reduce impacts on communities, farmland, forests, historic resources, wetlands, and private property owners. If substantial scope changes have occurred, it seems reasonable that PJM should carefully reevaluate whether this remains the best available solution before granting reapproval.

The citizens affected by this project are not opposed to reliable electric service. We are asking for transparency, accurate project information, realistic timelines, and a thorough review of alternatives before a project of this magnitude moves forward.

Thank you for your time and consideration.

Sincerely,

Christie Payne
Goochland County, Virginia

[Sent from the all new AOL app for iOS \[aolapp.onelink.me\]](https://aolapp.onelink.me)

From: Nola Palmer
Sent: Thursday, June 4, 2026 6:28 PM
To: Customer Service (Internet) <custsvc@pjm.com>
Subject: Valley Link Project

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Dear PJM and PJM Board of Managers

I am writing to express my extreme concern and formal opposition to the Valley Link project, specifically regarding the pending review of scope changes for the Joshua Falls-Yeat Transmission line. I am a landowner in Orange County, VA, where my family and I collectively own nearly 350 acres.

I request that this email be forwarded to the PJM Board of Managers ahead of their anticipated vote in July. Many community members and landowners share my opposition to this project in its current form. We are deeply concerned about the negative impacts this transmission line will have on our local community and the validity of its proposed timeline, especially given the significant opposition from both residents and county governments along nearly the entire length of the project.

Please formally record our opposition to any activity related to this project on or near our property. Additionally, please add me to any mailing lists regarding this project and provide updates as they become available.

Sincerely,

Nola Lynn Walker Palmer

From: Shannon Woodcock

Sent: Thursday, June 4, 2026 11:16 AM

To: Customer Service (Internet) <custsvc@pjm.com>

Subject: Valley Link - Joshua Falls-Yeat Transmission Line

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Good morning,

We have recently been made aware of the change in the proposed line that will sever our farm completely in half. The farm was purchased by my husband's grandparents in 1960. They raised their family here, my father in law raised his family here and now we are raising our family here. We have a small beef cattle operation. We graze our cattle and cut our hay crop in the fields that will be destroyed by the construction of the Valley Link electric lines. Our daughter is extremely active in 4-H and FFA and raises animals for show projects. Their barn and lot will be disrupted by these lines. She also has 2 horses she rides daily in the very field that will be overtaken by this monstrosity. That will leave nowhere for her to practice for the horse shows. We have a pond that supplies water to our land but also a fishing area for our family and neighbors. The lines and the construction will pollute the waters. There is a family cemetery beside the pond where we have laid to rest several members of our family. They chose to be laid to rest there because this farm has been the very center of the family for over 60 years.

We pay our mortgage and our taxes because it is our slice of heaven on earth. Allowing someone to take away everything we work for daily is just not right. We beg of you, please do not allow these lines to intrude on our home, and our farm.

Please forward this to the PJM Board of Managers.

Thank you for your time and consideration,

Ryan and Shannon Woodcock

Unionville, VA

From: Johannah Willsey

Sent: Tuesday, June 9, 2026 3:43 PM

To: Customer Service (Internet) <custsvc@pjm.com>

Subject: Questions and concerns about Valley Link project from an affected resident and homeowner

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I am writing as a deeply concerned resident of Fluvanna County whose home is on or very close to multiple proposed Valley Link routes.

Here are just a few of my concerns about living so close to a series of 140 foot towers under a 765v gigantic transmission line.

Our home is located approximately 200 feet from the proposed line. This is absolutely unsafe.

- Living near transmission lines is linked to health concerns including tumors and cancers, developmental disorders, immunodeficiency disorders, cognitive disorders like Alzheimer's, and more.
- Nations around the world recognize the damaging effects of much lower EMFs and provide laws and recommendations to keep residents safe.
- The 24 hour hum and static created by the line would be unbearable outdoors and possibly even indoors. This is a dramatic reduction in quality of life, and would destroy the quiet we so value as part of living in a rural area.

Transmission lines and the resulting EMFS are not safe for the environment.

- Construction activity, active power lines, and herbicide treatments will damage our well and water. Like many rural residents, this is our only source of water.

- Transmission corridors lead to habitat loss and fragmentation of the native wildlife with whom we share our land and enjoy every single day. They cause plant and wildlife disruption, ecosystem degradation, and reduction of carbon storage through removal of trees and other plant matter.

Such large structures are dangerous and unsightly.

- High voltage towers are extremely dangerous in high winds and create a forest fire hazard. Note the deadly and destructive 2018 Camp Fire in California was caused by faulty high voltage lines.
- The cleared corridor and gigantic towers destroy the rural character we specifically chose when we moved here. They visually alter the landscape and add imposing 12 story structures over our one story rural home.
- This technology has a limited life span and the rush to build data centers shows every sign of being a speculative bubble. In addition, the explosive energy demand being driven by AI and data centers is moving faster than communities can keep up. If we continue to build these structures, the Virginia landscape will soon be covered with hundreds of empty data centers and useless, rotting transmission towers. Talk about permanently altering the landscape for absolutely no benefit or good reason.

The energy that will go through this line is not even for this area!

- Valley Link representatives have stated that the power through these lines is solely for the use of northern Virginia data centers. Yet you're planning to drag a wrecking ball across 115 miles of pristine private property that will never benefit from any part of this process.
- Meanwhile, the sudden spike in energy requirements is due to the AI that no one asked for but uses dramatically more energy than other internet services– up to 10 times! Why should we pay for this with our hard-earned dollars, our homes, and our health and safety?
- Preservation Virginia and other cultural and environmental groups have determined the nine counties of the Valley Link project to be Virginia's most endangered cultural, historical, and environmental region in the state today as a result of this project.

Finally, if this path goes through as shown on the map, not only will our home be rendered unsafe for human habitation, we can expect our property to be devalued by up to 50%. This property is our nest egg and retirement fund. We simply cannot allow that to be destroyed for all of the above reasons.

In addition, recent changes in the Valley Link plan are part of a pattern of revisions, including

- major route revisions, including new greenfield corridors;
- changes to proposed landing-point location;
- relocation of the Joshua Falls substation site;
- continued uncertainty regarding final substation approvals;
- routing through landscapes identified by Preservation Virginia as among Virginia's most endangered historic resources;
- growing opposition from local governments across the proposed corridor;
- and a changing data-center development landscape, including reported project delays,
- cancellations, and tighter local review standards in some Virginia localities.

These many revisions raise concerns about planning certainty, permitting feasibility, project costs, and whether the project being advanced today remains materially consistent with the one originally presented and evaluated.

This leads to new questions for Valley Link, Dominion Energy, PJM, and other regulators responsible for evaluating and advancing the project:

- How many major revisions have occurred since the project was first announced?
- How have those revisions affected project costs, timelines, and impacted properties?

- Have changing data-center development trends affected the assumptions used to justify the project?
- Does the project being proposed today remain materially consistent with the project originally evaluated?

I ask that the questions and concerns raised here be forwarded to the PJB Board of Managers concerning their pending review of scope changes for the Joshua Falls-Yeat Transmission line.

Sincerely,

Johannah Willsey Resident of Fluvanna County

From: Katherine Denby
Sent: Tuesday, June 9, 2026 12:37 PM
To: Customer Service (Internet) <custsvc@pjm.com>
Subject: Valley Link Joshua Falls to Yeat Project

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June 09, 2026

Dear Sir or Madam,

Given the new Valley Link transmission line routes through Buckingham County, VA, I am voicing my concerns about the project before it is re-approved by the board.

Many are expressing distress over the impact on farmland in our community. The potential for serious environmental damage during the construction, operation and maintenance of these massive proposed towers is well documented - including noise and light pollution that will affect residents, livestock, and property values.

Specific impacts from the construction phase alone to farming include soil mixing, erosion, rutting, and compaction. commonly associated with transmission construction and can greatly affect future crop yields. Soils may be mixed during the excavation of pole foundations or during the undergrounding of electrical lines. The excavation depth for transmission structure foundations can vary greatly, but in some projects may be more than 50 feet deep. Excavated parent material or subsoils should not be mixed with topsoils and spread on the surface of the ROW. Significant rutting can occur when soils become saturated or in areas of sensitive soils (see Figure 3). This may impact agricultural lands by increasing the mixing of soils, eroding topsoils during rain events, and compacting soils. Ineffective erosion controls may wash valuable topsoils downhill and impact wetlands and waterways. Agricultural soils that have been improperly protected or mitigated may suffer decreased yields for several years after the construction of the transmission line is completed.

We have a family horse farm and are very worried that damage to our water table as well as the noise, particularly during thunderstorms, will have on livestock.

The deafening, explosive sound heard when lightning strikes a (765\text{ kV}\) tower is a combination of a direct **thunderclap** (caused by rapid air expansion) and an instantaneous **fault arc**. The massive electrical discharge briefly ionizes the surrounding air and vaporizes moisture, producing violent, crackling "snap" and "boom" sounds.

In addition, I question the validity of the PJM timeline given the scale of community concern and County government opposition to this project.

I respectfully request that these comments be forwarded to the PJM Board of Managers.

Thank you,

Katherine Denby, Buckingham County

June 1st, 2026
PJM Board of Managers
PJM Interconnection, L.L.C.
2750 Monroe Boulevard
Audubon, PA 19403

Re: Joshua Falls - Yeat Scope Change / Right-of-Way Feasibility and 2029 In-Service Risk

PJM Board of Managers:

We are property owners in Fluvanna and Goochland County with lands situated at or adjacent to critical segments of the proposed Joshua Falls–Yeat 765 kV transmission corridor. These include locations where all route options converge.

We write to formally advise PJM that the contemplated scope modification introduces substantial implementation risks that warrant careful review prior to any Board approval of a revised project configuration. This communication does not reflect a broad objection from uninvolved parties. Our properties lie at points that appear essential to the viability of the routing alternatives under consideration. At locations where multiple routes converge or where critical crossings are required, the availability of particular parcels takes on heightened importance. Should those parcels prove unavailable through voluntary easement negotiations, the project timeline, construction assumptions, and prospects for achieving the targeted 2029 in-service date would be materially impacted.

We have no intention of granting voluntary easements for this undertaking. Should the proposal advance to the Virginia State Corporation Commission and result in issuance of a Certificate of Public Convenience and Necessity, we will assert every legal right available to us in any ensuing easement negotiations, condemnation actions, valuation proceedings, or related litigation. PJM must not presume that right-of-way acquisition over these lands will proceed on a voluntary, straightforward, or expeditious basis. Landowners further intend to contest, to the maximum extent allowed by law, whether eminent domain may be constitutionally exercised to take private property for a project that has been consistently described, promoted, and advanced primarily to accommodate private hyperscale data center expansion. Such a challenge may encompass whether the undertaking meets Virginia's public-use standards under the state constitution and, if necessary, will be pursued through all available avenues of appellate review, including before the Supreme Court of Virginia. This constitutes a genuine feasibility concern. A transmission initiative of this magnitude cannot be assessed solely on the basis of whether it would resolve identified reliability issues once hypothetically placed in service. PJM must also determine whether the project can

realistically be sited, permitted, acquired, litigated where required, and constructed within the necessary timeframe.

For this initiative, those risks are significant. The proposed Joshua Falls–Yeat corridor would entail construction of a new 765 kV greenfield line traversing extensive private property, encompassing sensitive historic districts and strategically important crossing locations. The effort would necessitate continuous right-of-way acquisition across numerous parcels. Opposition at convergence points or key crossings is not confined to isolated segments; it has the potential to undermine the practicality of entire route portions.

PJM should refrain from endorsing any scope modification predicated on an assumed 2029 in-service date without first obtaining a thorough, realistic evaluation of the right-of-way and litigation exposures now apparent along the revised corridor.

Prior to any approval, PJM should direct the project sponsors to address the following matters:

- Whether the 2029 in-service date continues to be attainable should landowners at route-convergence locations and major crossings decline to provide voluntary easements;
- Whether the project schedule accounts for contested condemnation proceedings, valuation disputes, judicial timelines, appeals, and any resulting construction delays stemming from right-of-way litigation;
- The extent to which multiple route alternatives rely upon the same or closely proximate parcels in counties where landowners have indicated opposition to voluntary easement grants;
- Whether the project sponsors have developed alternative alignments capable of bypassing parcels where voluntary acquisition appears improbable;
- Whether the projected project cost incorporates the reasonably anticipated expenses associated with contested easement acquisition, litigation, delays, access restrictions, and any necessary route adjustments;
- Whether existing transmission corridors, existing substations, or other configurations could lessen reliance on new greenfield right-of-way over private land;
- Whether PJM has analyzed the aggregate execution risk arising from opposed route segments in these counties, and widespread landowner and county-level resistance along the corridor.

These considerations are not speculative. They represent identifiable risks to execution and feasibility that are already known prior to Board action. The landowners submitting this letter are formally notifying PJM that these outstanding right-of-way, litigation, routing will form part of the official record in any subsequent Virginia SCC proceeding if

the scope change is approved and a CPCN application is later submitted. That record will demonstrate that PJM received advance notice—before scope-change approval—of unresolved feasibility issues surrounding route acquisition, contested properties at critical convergence zones, and active landowner opposition.

PJM should withhold approval of the Joshua Falls–Yeat scope change unless and until the project sponsors establish that the revised route configurations are feasible, constructible, and realistically capable of meeting the stated 2029 in-service date.

Recent additions to the potential routes in this project now impact additional landowners. We are confident that many of those newly impacted landowners will also sign on to preserve their property and pursue these issues through appellate review, including review by the Supreme Court of Virginia.

Landowner Signatures on Following Pages

Name	Tax Map	County	Route(s)	Signature
Peter + Julie Muniz		Goodland	Y	<i>Julio D. Muniz</i>
Bryant Edwards	23-A-106	Fluvanna	B	<i>Bryant Edwards</i>
Mike Lewis	34-A-2	Fluvanna	B	<i>Michael W. Lewis</i>
Sarah Radcliff	33-A-34C	Fluvanna	B	<i>Sarah Radcliff</i>
William Carl	44-2-6	Fluvanna	B	<i>William Carl</i>
Geneva Payne	1-1-0-19-0 24-A-23 24-A-24B 24-A-24C 24-A-24D	Goodland Fluvanna	B	<i>Geneva B. Payne</i>
Amy Seay	13-A-12	Fluvanna	D	<i>Amy Seay</i>
Christie (Seay) Aviar	54 35-249	Fluvanna	Western Route Palmyra	<i>Christie Aviar</i>
CHARLES PERKINS	1-1-0-18-0	Goodland	B	<i>Charles Perkins</i>

From: Patrick Oxenham

Sent: Tuesday, June 9, 2026 5:41 PM

To: info-response

Subject: Re: Comments for PJM Board of Managers Regarding Joshua Falls–Yeat Re-Approval

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Dear PJM Client Management and Member Services,

Thank you for your response and for confirming that my correspondence has been forwarded to the PJM Board of Managers and Planning Department management for review.

After reviewing your reply and the resources you directed me to, I believe they **reinforce** rather than resolve the concerns raised in my original correspondence.

My original email did not ask PJM to select a different route, acquire easements, or become the arbiter of local land use decisions. I recognize those responsibilities belong elsewhere.

Rather, it asked whether PJM can responsibly review and confirm a materially revised implementation ***without also reviewing the implementation risks those revisions have created.***

After reflecting on your response and reviewing the materials you referenced, I believe the central issue is actually much simpler.

PJM has acknowledged that it reviews and confirms significant scope changes. Therefore, if implementation risks created by those changes are not part of that review, then the review itself is incomplete.

That is the concern I am asking the Board to consider.

PJM's own materials emphasize planning, preparation, stakeholder coordination, and thoughtful solutions to ensure future reliability. Likewise, ValleyLink's public materials explain that routes are refined through stakeholder engagement and landowner feedback before advancing for review.

Those statements recognize an important reality: **successful reliability planning depends** not only on identifying an engineering solution, but **on identifying one that can realistically and responsibly be implemented.**

The current ValleyLink proposal appears to have shifted substantially from the original **2024 PJM planning** concept, which emphasized **using existing corridors and already disturbed areas where feasible.** The proposal now being advanced appears to rely overwhelmingly on new greenfield construction through previously undisturbed rural landscapes.

Standing alone, that observation may simply be a routing discussion.

The consequences of that shift, however, are not.

Today the project continues to experience repeated route revisions, growing public opposition, increasing local government resistance, declining public confidence in the planning process, and heightened regional scrutiny.

Those are not merely emotional reactions. They are implementation risks. They create risks to project schedule, project feasibility, project cost, and ultimately whether the identified reliability solution can be successfully delivered.

Your response appears to separate PJM's reliability responsibilities from the practical consequences of the implementation chosen to achieve that reliability.

Respectfully, I believe that distinction breaks down when those implementation decisions themselves create measurable risks to successful project delivery. If implementation decisions create risks that threaten successful delivery of the reliability solution itself, then those risks are directly relevant to PJM's review.

This is particularly important because the current implementation appears materially different from the planning philosophy that originally supported the project. A proposal that evolves from one centered on minimizing new greenfield impacts through existing corridors to one that appears **overwhelmingly new greenfield should**, in my view, **warrant more than a procedural confirmation.** It should warrant a substantive review of why that change occurred, whether the resulting implementation risks have been adequately considered, and whether the revised implementation remains the most practical and realistically achievable solution.

I also respectfully ask PJM to clarify **what threshold of change** would warrant deeper review. If a proposal can undergo such substantial changes in implementation strategy without triggering additional scrutiny into the resulting implementation risks, then affected communities deserve to understand what level of change would trigger that review.

ValleyLink represents one of the most significant transmission projects Virginia has seen in decades. The precedent established here will likely influence how future infrastructure projects are planned, evaluated, and accepted across the Commonwealth.

For that reason, I respectfully **request that PJM clarify** how implementation risks created by significant scope changes are evaluated as part of the Board's review, whether growing public opposition, repeated route revisions, and increasing local government resistance are considered relevant implementation risks, and where, if anywhere, that evaluation is documented as part of the Board's decision-making process.

I respectfully request that this correspondence also be provided to the PJM Board of Managers as part of the official record.

Thank you for your time and consideration,

Thomas "Patrick" Oxenham
Buckingham County, Virginia

From: Amy Seay

Sent: Wednesday, June 10, 2026 2:16 PM

To: Customer Service (Internet) <custsvc@pjm.com>

Subject: Opposition to and Request for Reevaluation of Proposed Scope Changes to the Joshua Falls–Yeat Transmission Project

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To Whom It May Concern,

Please forward this email to the PJM Board of Managers regarding its pending review of scope changes to the Joshua Falls/Yeat transmission project.

My name is Amy Seay, and I am a resident of Louisa County, Virginia.

I oppose the Joshua Falls/Yeat transmission project and the proposed scope changes currently under consideration. Based on the information available, I do not believe the revised project has been sufficiently evaluated, and I remain concerned about its impacts on affected communities, private property owners, agricultural lands, and local governments along the proposed corridor.

Since PJM originally selected this project, significant changes appear to have occurred. The route has been modified, the corridor length has changed, proposed facilities have changed, and project maps now appear to show a new substation location associated with the Joshua Falls portion of the project.

These changes raise an important question: Is the project currently under consideration materially different from the project PJM originally approved?

The Culpeper County Board of Supervisors has formally notified PJM that the proposed Culpeper Yeat Substation is not an acceptable terminal site for the project and has requested a more comprehensive evaluation of alternatives before approval of the revised configuration. Because the proposed substation is a key component of the revised project, this position raises important questions regarding project feasibility and the necessity of approving the revised scope at this time.

If a new Joshua Falls substation is also required, additional approvals, land acquisition, permitting, and regulatory review may be necessary.

Given these circumstances, I respectfully request that PJM carefully evaluate whether the current project scope remains consistent with the project originally approved and whether the proposed schedule remains realistic.

If the scope has materially changed, PJM should require a thorough review of the revised project and its alternatives before granting reapproval.

Thank you for your time and consideration.

Sincerely,

Amy Seay
Louisa County, Virginia

From: Megan Chandler-Melton

Sent: Thursday, June 11, 2026 11:39 AM

To: Customer Service (Internet) <custsvc@pjm.com>

Subject: Comments on JFYT Timeline

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Please forward my comment to the PJM Board of Managers concerning their pending review of scope changes for the Joshua Falls-Yeat Transmission line.

As a Charlottesville community member, I am writing to oppose the JFYT line and question the timeline for decision making. I want my children to grow up in a region rich in nature and resources, not depleted from the toll of a single industry. I'm writing in solidarity with my county friends, whose wells are already running dry thanks to drought and data centers, as well my own family, who have been caring and cultivating Virginia land for generations. I write out of concern for every soul in the Commonwealth whose future is compromised by these insane projections of data center energy usage.

Given the irreversible impact these decisions might have on our region, our climate, and our communities, I question the validity of the timeline.

Megan Chandler-Melton

Charlottesville, VA

From: Sarah Holland

Sent: Sunday, June 14, 2026 3:10 PM

To: Anders, David <David.Anders@pjm.com>; Judith.Box@dominionenergy.com; harrison.s.potter@dominionenergy.com; edean@aep.com

Subject: No to Yeat-Joshua Falls proposal

⚠ External Email! Think before clicking links or attachments.

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Dear Board of Directors,

I am writing to express my strong opposition to the Valley Link transmission project and the proposed 765-kV power lines planned near my property.

My farm is not only my home, but also an active cattle operation and the location of my family cemetery. The proposed route passing so close to our land raises serious concerns for my family, my livestock, and the long-term future of our property.

I am deeply concerned about the impacts that accompany large transmission lines of this size, including potential health concerns, disruption to agricultural operations, loss of property value, visual impacts, noise, and the permanent alteration of rural farmland and historic family land. The presence of a family cemetery on the property makes this especially personal and troubling.

I also strongly oppose the proposed YEAT substation in Richardsville and the additional industrial impact it would bring to our rural community and surrounding agricultural land.

Our farms and rural communities are part of what makes Culpeper County unique. Projects of this magnitude should not come at the expense of families who have worked and cared for this land for generations.

I respectfully ask that you oppose the Valley Link project, the proposed YEAT substation in Richardsville, and advocate for protecting the property rights, agricultural operations, and historical family lands of the citizens you represent.

Thank you for your time and consideration.

Sarah Holland
Lignum, Va.

From: Kristen BORDEN

Sent: Monday, June 15, 2026 2:50 PM

To: Customer Service (Internet) <custsvc@pjm.com>

Cc: Anders, David <David.Anders@pjm.com>

Subject: Formal Objection and Request for Consideration of Public Safety, Community Resilience, and Land Use Compatibility for the Proposed Yeat Substation and Valley Link Project

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To PJM Interconnection:

We submit this letter as a formal objection to the proposed Yeat Substation and associated Valley Link Project and respectfully request that PJM carefully consider whether the proposed location in Richardsville, Culpeper County, Virginia is compatible with the realities of the community expected to host this facility.

PJM has justified the original project as necessary to promote reliability. However, significant changes have been made to the original proposal, including the proposed siting of the substation. Reliability should encompass more than the movement of electricity. Reliability and resilience must also include the ability of surrounding communities to safely respond to emergencies, maintain access to essential services, and recover from disasters.

The newly proposed Yeat site on Culpeper County parcels 68-29 and 68-40 is located within a rural agricultural community characterized by limited roadway infrastructure, heavily wooded terrain, reliance on private wells, volunteer emergency services, and low-density residential and agricultural land uses. These conditions are fundamentally incompatible from those typically associated with industrial infrastructure of this magnitude.

Emergency Access and Community Resilience

Residents have repeatedly experienced situations in which downed trees and severe weather blocked local roads, leaving Eleys Ford Road as the only practical means of ingress and egress for portions of the community. The Richardsville Volunteer Fire Department has expressed serious concerns regarding emergency access and the possibility that residents could become isolated during a major incident.

The addition of a massive regional transmission hub introduces risks that include:

- Transformer fires;
- Hazardous materials incidents;
- Wildfire potential;
- Road closures and construction impacts;
- Emergency exclusion zones;
- Simultaneous severe weather events.

A project intended to enhance electric reliability elsewhere should not create a single point of failure for public safety. Community resilience and public safety are themselves elements of reliability.

Mischaracterization of the Surrounding Community

Valley Link project representatives have repeatedly suggested that very few residents are affected and at one point indicated that only ten properties would experience direct impacts. This characterization misrepresents the reality of the Richardsville community.

Hundreds of homes are located along Eleys Ford Road and adjoining roads, with many additional residences situated on secondary roads and private drives. The area consists of established neighborhoods, farms, churches, businesses, and historic properties connected by a limited roadway network.

Any assessment that focuses only on immediately adjacent parcels fails to account for the broader population whose safety, property rights, quality of life, and access to emergency services will be affected.

Reliability Should Not Create New Vulnerabilities

PJM's responsibility extends beyond electrical engineering. A project justified in the name of reliability should not:

- Reduce community resilience;

- Increase dependence upon a single access route;
- Expose residents to avoidable emergency risks;
- Place critical infrastructure in locations lacking sufficient supporting infrastructure;
or
- Create conditions in which residents may become isolated during emergencies.

Reliability should not be measured solely in terms of electrical transmission. It must also account for the resilience and safety of the communities expected to host these facilities.

Inconsistency with Local Planning and Agricultural Zoning

The proposed Yeat Substation is inconsistent with the intent and objectives of Culpeper County's Comprehensive Plan and the purpose of agricultural zoning, both of which were established to protect residents and preserve the rural character, natural resources, and quality of life of the County.

These policies were adopted specifically to guide development and to prevent incompatible land uses from being imposed upon established communities. They recognize that not every use is appropriate in every location and that the health, safety, and welfare of residents must remain paramount. The Richardsville area was planned and zoned for agricultural and rural residential uses, not for the siting of an industrial-scale regional transmission hub serving demand elsewhere.

To disregard these policies would undermine the purpose of local planning and land-use protections and effectively render meaningless the safeguards intended to protect communities from incompatible development. Comprehensive plans and zoning ordinances exist precisely to protect communities from being subjected to incompatible land uses. If those protections are set aside whenever a sufficiently large corporation seeks an exception, then the planning process itself loses its purpose.

Fundamental Land Use Incompatibility

The concerns described above are not issues that can be resolved through landscaping, buffers, traffic studies, or other superficial mitigation measures. The problem is the location itself.

Richardsville is a rural agricultural community that was never planned, zoned, or developed to host an industrial-scale regional transmission hub. No amount of mitigation can alter the underlying incompatibility between the existing character of the community and the proposed use.

The people of this community are not seeking to negotiate the terms under which this project becomes acceptable. Based on the realities of the surrounding area, we do not believe this project belongs here.

Continued Community Opposition

Residents of Culpeper County have consistently demonstrated their opposition through public meetings, engagement with elected officials, comments, and participation throughout the regulatory process. The community does not view this project as beneficial, nor does it believe that the burdens imposed upon the area are justified.

Citizens remain committed to participating fully in every stage of the administrative and legal processes available to them. Opposition to this proposal is broad, sustained, and deeply rooted. It is not temporary, nor is it subject to negotiation through promises of mitigation measures or financial incentives.

The residents of this community did not choose to become a sacrifice zone for infrastructure intended to serve regional demand elsewhere, and they will continue to defend their homes, property rights, safety, and quality of life through every lawful means available.

Conclusion

The people of Richardsville are not asking how this project can be made acceptable. They are asking how this location was considered appropriate in the first place.

Richardsville is not vacant land. It is not an industrial corridor. It is not an empty landscape occupied by only a handful of residents. It is a thriving rural community with hundreds of families, farms, churches, businesses, and historic properties connected by limited infrastructure and protected by volunteer emergency services.

A project designed to improve regional reliability should not do so by creating new vulnerabilities and imposing disproportionate burdens on a rural community that neither needs, benefits from, nor wants this infrastructure.

The question before PJM should not simply be whether the proposed facilities can be engineered. It should also be whether they belong here. Based upon the realities of the surrounding community, the answer is no.

Respectfully,

Kristen Borden

Co-Chair, Richardsville Coalition
Culpeper County, Virginia

From: Susan Caulfield
Sent: Thursday, June 18, 2026 12:35 PM
To: Anders, David <David.Anders@pjm.com>
Subject: Comment on Scope Change -Joshua Falls-Yeat (2024 RTEP Window 1)

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Please provide our comments to the PJM Board of Managers before the expected July vote on the Joshua Falls-Yeat scope change.

Dear PJM Board,

I am writing about Dominion Energy's original Valley Link proposal to PJM, which was approved in early 2025, creating a high-voltage reliability solution to power Northern Virginia data centers. Today, the "Joshua Falls-to-Yeat" segment has shifted to predominantly greenfield construction, with taller 765 kV structures and altered routes. Due to the scope change, we question the feasibility of the entire line and both substations.

We understand Valley Link submitted proposals during PJM Interconnection's Regional Transmission Expansion Plan (RTEP) window, and PJM approved the project in February 2025 as a public necessity to address surging energy demands due to data centers in Northern Virginia, primarily Loudoun County and Prince William County. In this proposal, the lines were maximizing **existing infrastructure and minimizing new greenfield impacts**.

Today, the routes have completely changed. The routes are shifting to a majority of greenfield from the original brownfield route, creating a detrimental impact on the following nine counties.

- **Campbell County** (origin point at Joshua Falls)
- **Appomattox County**
- **Buckingham County**
- **Fluvanna County**
- **Goochland County**
- **Louisa County**
- **Orange County**
- **Spotsylvania County**
- **Culpeper County** (termination point/proposed substation)

These rural counties will bear the brunt of the Joshua Falls-to-Yeat project, both from the land use perspective, as well as financially, as they will be paying to cover the cost for power that won't go to the local communities. Instead, the lines and substations will fuel the massive data center industry in Northern Virginia.

We ask that the Board consider the feasibility, constructability, endpoint land acquisition, local opposition, and in-service date risks, as they should be taken into account due to the proposed scope change by Valley Link.

Sincerely,

From: Abby R

Sent: Thursday, June 18, 2026 2:21 PM

To: Anders, David <David.Anders@pjm.com>; Customer Service (Internet) <custsvc@pjm.com>

Subject: Comment on Scope Change -Joshua Falls-Yeat (2024 RTEP Window 1)

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Please provide my comments to the PJM Board of Managers before the expected July vote on the Joshua Falls-Yeat scope change.

Dear PJM Board,

I am a practicing civil engineer and a resident of Appomattox County, Virginia. I am writing regarding Dominion Energy's original Valley Link proposal, which PJM approved in early 2025 as a reliability solution necessary to address increasing electrical demand associated with Northern Virginia.

I understand that the original proposal emphasized maximizing existing infrastructure and minimizing greenfield impacts. However, the currently proposed Joshua Falls-to-Yeat segment appears to have shifted substantially toward predominantly greenfield construction utilizing taller 765 kV structures and significantly altered routes.

Given the magnitude of these changes, I respectfully ask the Board to reconsider whether the assumptions underlying the original approval remain valid.

These changes introduce substantial risks that should be carefully evaluated, including:

- Constructability challenges associated with predominantly greenfield construction.
- Environmental permitting complexity.

- Land acquisition difficulties and increasing local opposition.
- Reliance on approvals that have not yet been secured.
- Schedule risk and the potential inability to achieve the required in-service date.
- The feasibility of endpoint facilities and associated substations.
- Cumulative impacts to agricultural lands, watersheds, and rural communities.

The burden of the project is now concentrated across nine predominantly rural counties (Campbell, Appomattox, Buckingham, Fluvanna, Goochland, Louisa, Orange, Spotsylvania, and Culpeper). However, the primary benefits are intended to support continued growth in Northern Virginia.

Importantly, these impacts are not limited to individual parcels. They affect multi-generational farms and families with profound connections to the land they have stewarded for decades, and in many cases like my family's, for well over a century. These landowners are not simply evaluating compensation packages. We view ourselves as caretakers of a legacy that we intend to preserve for future generations and are committed to pursuing every available avenue to protect it. This reality should be recognized as a significant factor affecting project feasibility, land acquisition, schedule, and public acceptance.

From a project development perspective, major deviations in routing, structure size, environmental impacts, and public acceptance should warrant renewed scrutiny. A project that has transitioned from utilizing existing infrastructure to predominantly greenfield construction may no longer represent the same project that PJM originally approved.

As a practicing civil engineer, I recognize that no infrastructure project is without impacts. However, good engineering requires balancing competing interests and striving to achieve the greatest benefit while minimizing irreversible harm. Given the scale of the changes and the significant impacts now imposed on agricultural operations, watersheds, and generational family farms, the current alignment does not truly represent the most practical, constructible, and least damaging alternative available.

Reliable energy infrastructure is essential. However, reliability also depends on selecting projects that are realistic, timely, and capable of being implemented without creating unnecessary risks that threaten successful completion.

I respectfully ask the Board to carefully evaluate whether the current proposal and route remains the same project originally approved and whether its revised scope continues to represent the most reasonable and achievable solution.

Thank you for your consideration.

Respectfully,

Abby Ranson, E.I.T.

Concord, VA

Civil Engineer
Appomattox County, Virginia
Passed NCEES PE Examination

From: Beckham Ransons

Sent: Thursday, June 18, 2026 2:25 PM

To: Anders, David <David.Anders@pjm.com>; Customer Service (Internet)
<custsvc@pjm.com>

Cc: chris ranson

Subject: Comment on Scope Change — Joshua Falls to Yeat (2024 RTEP Window 1)

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Please provide my comments to the PJM Board of Managers before the expected July vote on the Joshua Falls–Yeat scope change.

To: PJM Board of Managers

Dear PJM Board,

I am writing to comment on the scope change for the Joshua Falls–Yeat segment of the Valley Link proposal, submitted through the 2024 RTEP Window 1 process.

When PJM approved the original Valley Link proposal in early 2025, the project was presented as a high-voltage reliability solution that largely leveraged existing infrastructure to serve growing data center demand in Northern Virginia. The current Joshua Falls–Yeat

segment, however, has shifted toward predominantly greenfield construction with taller 765 kV structures and substantially altered routing. Because of this scope change, I respectfully question the feasibility and prudence of the proposed segment and its associated substations as currently configured.

The revised routing now places significant new impacts on the following counties:

- Campbell County (origin point at Joshua Falls)
- Appomattox County
- Buckingham County
- Fluvanna County
- Goochland County
- Louisa County
- Orange County
- Spotsylvania County
- Culpeper County (termination point/proposed substation)

These largely rural counties will shoulder the majority of land-use impacts and property acquisitions while receiving little direct local benefit; the primary load served by the line and substations will be data centers located in Northern Virginia. That imbalance raises serious questions about the project's constructability, local impacts, and cost allocation.

Accordingly, I ask the Board to consider the following before voting on the scope change:

1. **Feasibility and Constructability:** Has PJM evaluated the engineering and construction challenges associated with the new greenfield alignment and taller 765 kV structures, including terrain, environmental constraints, and permitting complexity?
2. **Endpoint Land Acquisition and Rights-of-Way:** Has a realistic assessment been completed of the time, cost, and legal risks of acquiring the necessary land and easements at both endpoints and along the revised corridor?
3. **Local Opposition and Delay Risk:** Has PJM accounted for the likelihood of sustained local opposition, potential environmental and cultural resource reviews, and the resulting schedule and cost impacts?

4. **In-Service Date and Reliability Assumptions:** Given the scope change, are the original in-service date and reliability benefits still achievable without significant schedule slippage or cost escalation?
5. **Alternatives Analysis:** Will PJM require Valley Link to provide a comparative analysis of alternative routes and configurations that minimize new greenfield impacts and better leverage existing infrastructure?

The scope change materially alters the project's footprint and risk profile. For the Board to make an informed decision, I respectfully request that PJM ensure these constructability, acquisition, environmental, and schedule risks are fully documented and considered.

Thank you for your attention to these concerns. Please provide my comments to the PJM Board of Managers prior to the expected July vote on the Joshua Falls-Yeat scope change.

Sincerely,
Chris Ranson
Concord, VA

Note: Please confirm the Board has received this submission and advise whether PJM will publish any updated feasibility or alternatives analyses related to the scope change.

From: Sharon Duke
Sent: Thursday, June 18, 2026 3:55 PM
To: Anders, David <David.Anders@pjm.com>; Customer Service (Internet) <custsvc@pjm.com>
Subject: Scope change Joshua Falls-Yeat(2024 RTEP Window 1)

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Please provide my comments to the PJM Board prior to the July vote on the scope change of the Joshua Falls to Yeat project

Dear PJM Board

I am writing about Dominion Energy's original Valley Link proposal to PJM, which was approved in early 2025, creating a high-voltage reliability solution to power Northern Virginia data centers.

Today, the "Joshua Falls-to-Yeat" segment has shifted to predominantly greenfield construction, with taller 765 kV structures and altered routes. Due to this scope change, I question the feasibility of the entire line and both substations.

I understand Valley Link submitted proposals during PJM Interconnection's Regional Transmission Expansion Plan (RTEP) window, and PJM approved the project in February 2025 as a public necessity to address surging energy demands due to data centers in Northern Virginia, primarily Loudoun County and Prince William County. In this proposal, the lines were maximizing existing infrastructure and minimizing new greenfield impacts.

Today, the routes have completely changed. The routes have shifted to a majority of greenfield, creating a detrimental impact on the following nine counties.

- Campbell County (origin point at Joshua Falls)
- Appomattox County
- Buckingham County
- Fluvanna County
- Goochland County
- Louisa County
- Orange County
- Spotsylvania County
- Culpeper County (termination point/proposed substation)

These rural counties will bear the brunt of the Joshua Falls-to-Yeat project, both from the land use perspective, as well as financially, as they will be paying to cover the cost for power that won't go to the local communities. Instead, the lines and substations will fuel the massive data center industry in Northern Virginia.

We ask that the Board consider the feasibility, constructability, endpoint land acquisition, local opposition, and in-service date risks. They should all be taken into account due to the proposed scope change by Valley Link.

Thank you for reading this.

Blessings and Best Regards

Sharon Duke

From: Paula Durbin-Westby

Sent: Thursday, June 18, 2026 10:05 PM

To: Anders, David <David.Anders@pjm.com>; Customer Service (Internet)
<custsvc@pjm.com>

Cc: Paula Durbin-Westby

Subject: Comment on Scope Change -Joshua Falls-Yeat (2024 RTEP Window 1)

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Dear PJM Board,

Please provide my comments to the PJM Board of Managers before the expected July vote on the Joshua Falls-Yeat scope change.

I am writing about Dominion Energy's *original* Valley Link proposal to PJM, which was approved in early 2025, creating a high-voltage reliability solution to power Northern Virginia data centers. Today, the "Joshua Falls-to-Yeat" segment has shifted to predominantly greenfield construction, with taller 765 kV structures and altered routes, *some of which have been recently re-altered*. Due to the scope change, we question the feasibility of the entire line and both substations.

We understand Valley Link submitted proposals during PJM Interconnection's Regional Transmission Expansion Plan (RTEP) window, and PJM approved the project in February 2025 as a public necessity to address surging energy demands due to data centers in Northern Virginia, primarily Loudoun County and Prince William County.

In this proposal, the lines were maximizing **existing infrastructure and minimizing new greenfield impacts**.

Today, the routes have completely changed. The routes are shifting to a majority of greenfield from the original brownfield route, creating a detrimental impact on the following nine counties:

- **Campbell County (origin point at Joshua Falls, except I think they have changed it to another location)**
- **Appomattox County**
- **Buckingham County**
- **Fluvanna County**
- **Goochland County**
- **Louisa County**

- **Orange County**
- **Spotsylvania County**
- **Culpeper County** (termination point/proposed substation, **which has not been approved**)

These rural counties will bear the brunt of the Joshua Falls-to-Yeat project, both from the land use perspective, as well as financially, as they will be paying to cover the cost for power that won't go to the local communities. Instead, the lines and substations will fuel the massive data center industry in Northern Virginia.

We ask that the Board consider the *feasibility, constructability, endpoint land acquisition, local opposition, and in-service date risks*, as they should be taken into account due to the *proposed scope change* by Valley Link.

Best regards,

Paula Durbin-Westby

From: Melissa Copeland

Sent: Friday, June 19, 2026 2:46 PM

To: Customer Service (Internet) <custsvc@pjm.com>; Anders, David
<David.Anders@pjm.com>

Subject: Comment on Scope Change -Joshua Falls-Yeat (2024 RTEP Window 1)

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Contact the Support Center immediately if you click on a link or open an attachment that appears malicious.

Please provide my comments to the PJM Board of Managers before the expected July vote on the Joshua Falls-Yeat scope change.

Dear PJM Board,

I am writing about Dominion Energy's original Valley Link proposal to PJM, which was approved in early 2025, creating a high-voltage reliability solution to power Northern Virginia data centers. Today, the "Joshua Falls-to-Yeat" segment has shifted to predominantly greenfield construction, with taller 765 kV structures and altered routes. Due to the scope change, we question the feasibility of the entire line and both substations.

We understand Valley Link submitted proposals during PJM Interconnection's Regional Transmission Expansion Plan (RTEP) window, and PJM approved the project in February 2025 as a public necessity to address surging energy demands due to data centers in Northern Virginia, primarily Loudoun County and Prince William County.

In this proposal, the lines were maximizing existing infrastructure and minimizing new greenfield impacts.

Today, the routes have completely changed. The routes are shifting to a majority of greenfield from the original brownfield route, creating a detrimental impact on the following nine counties.

- Campbell County (origin point at Joshua Falls)
- Appomattox County
- Buckingham County
- Fluvanna County
- Goochland County

- Louisa County
- Orange County
- Spotsylvania County
- Culpeper County (termination point/proposed substation)

These rural counties will bear the brunt of the Joshua Falls-to-Yeat project, both from the land use perspective, as well as financially, as they will be paying to cover the cost for power that won't go to the local communities. Instead, the lines and substations will fuel the massive data center industry in Northern Virginia.

We ask that the Board consider the feasibility, constructability, endpoint land acquisition, local opposition, and in-service date risks, as they should be taken into account due to the proposed scope change by Valley Link.

Melissa Copeland

-----Original Message-----

From:

Sent: Friday, June 19, 2026 4:37 PM

To: Anders, David <David.Anders@pjm.com>

Subject: Input on the Planned Addition of More Transmission Lines in Virginia

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Dear PJM Members Committee Secretary David Anders,

This letter is regarding PJM's planned regional transmission expansion plans throughout Virginia, specifically: RTEP 2025 Window 1, and the selected Proposals 275 and 331, both from Dominion Energy, in order to provide yet more power to serve data centers.

These lines pose a major threat to the health of the land, wildlife and humans within its path.

I am concerned all of these numerous lines will cross through valuable greenfields and will have a significant impact on residential neighborhoods and community resources like parks, trails and historic sites, as well as large areas of conserved lands. We need our agricultural resources much more than we need to use AI.

Sincerely,

Ms. Angie Mason

From: Kristen BORDEN

Sent: Sunday, June 21, 2026 11:02 AM

To: Walker, William <William.Walker@pjm.com>; Customer Service (Internet) <custsvc@pjm.com>; Anders, David <David.Anders@pjm.com>

Cc:

Subject: Subject: Request to Include This Response in the Public Record

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Dear Members of the PJM Board and Planning Department,

Thank you for your response and for confirming that my previous correspondence has been forwarded to the Board and included on the Board Communication page.

I respectfully request that this response likewise be included in the public record.

You suggest that residents' direct concerns to Valley Link. We have done so repeatedly. Unfortunately, our experience has been that meaningful concerns are dismissed. Community members have been told that we simply need to "sacrifice for the greater good." Valley Link representatives have acknowledged that the studies residents would reasonably expect to have been completed have not yet been performed, while explanations and justifications often vary depending on who is asking the question. Such behavior does not inspire confidence and does not reflect the level of transparency and rigor the public deserves.

More importantly, I believe my concerns are directed to exactly the right audience.

PJM originally approved a project centered around existing infrastructure and limited greenfield impacts, with a substation location where transmission infrastructure already existed. The project now being pursued bears little resemblance to that concept. Residents are facing approximately 115 miles of new greenfield transmission infrastructure and the construction of entirely new greenfield substations. This represents a significant departure from what was originally contemplated and approved.

PJM should not treat a project that has evolved from upgrades centered around existing infrastructure into 115 miles of new greenfield transmission and entirely new substation sites as a routine adjustment. Such a dramatic change deserves heightened scrutiny, not automatic approval. If these changes require Board review and confirmation, then it is entirely appropriate and necessary that the Board hear directly from the communities being affected.

Local governments across the project area have repeatedly expressed that these proposals are incompatible with their comprehensive plans, land use policies, and community expectations. Multiple Boards of Supervisors have formally opposed these projects and have communicated those concerns through resolutions and letters. Those voices deserve to carry at least as much weight as trade associations and corporate advocacy groups.

Residents have observed that letters from organizations such as the Virginia Chamber of Commerce and other institutions supporting these projects are being posted publicly and prominently on your website, while many letters and resolutions from local governments opposing them receive far less visibility. Whether intentional or not, that disparity creates the appearance of bias.

Virginia residents are paying attention. They understand that utility executives and industry representatives occupy influential positions within many of the organizations advocating for these projects. They are increasingly concerned that monopoly utilities possess

disproportionate influence over processes that are supposed to balance reliability with the interests of the communities that must live with the consequences.

Public confidence requires that all viewpoints be afforded equal consideration. Highlighting endorsements while failing to provide comparable visibility to the formal objections of local governments only reinforces the perception that the process favors powerful institutions over the citizens whose homes, farms, businesses, and communities are being impacted.

Reliability is important, but reliability should not come at the expense of transparency, fairness, and respect for local communities. The people living along these proposed routes are not obstacles to be managed or sacrifices to be demanded. They are citizens whose concerns deserve to be heard and whose local governments deserve to be respected.

Thank you for your consideration, and I respectfully request that this correspondence be included in the public record alongside my previous submission.

Sincerely,

Kristen Borden

Richardsville Coalition
Culpeper County, Virginia

From: Kristen BORDEN

Sent: Monday, June 15, 2026 2:50 PM

To: Customer Service (Internet) <custsvc@pjm.com>

Cc: Anders, David <David.Anders@pjm.com>

Subject: Formal Objection and Request for Consideration of Public Safety, Community Resilience, and Land Use Compatibility for the Proposed Yeat Substation and Valley Link Project

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To PJM Interconnection:

We submit this letter as a formal objection to the proposed Yeat Substation and associated Valley Link Project and respectfully request that PJM carefully consider whether the proposed location in Richardsville, Culpeper County, Virginia is compatible with the realities of the community expected to host this facility.

PJM has justified the original project as necessary to promote reliability. However, significant changes have been made to the original proposal, including the proposed siting of the substation. Reliability should encompass more than the movement of electricity. Reliability and resilience must also include the ability of surrounding communities to safely respond to emergencies, maintain access to essential services, and recover from disasters.

The newly proposed Yeat site on Culpeper County parcels 68-29 and 68-40 is located within a rural agricultural community characterized by limited roadway infrastructure, heavily wooded terrain, reliance on private wells, volunteer emergency services, and low-density residential and agricultural land uses. These conditions are fundamentally incompatible from those typically associated with industrial infrastructure of this magnitude.

Emergency Access and Community Resilience

Residents have repeatedly experienced situations in which downed trees and severe weather blocked local roads, leaving Eleys Ford Road as the only practical means of ingress and egress for portions of the community. The Richardsville Volunteer Fire Department has expressed serious concerns regarding emergency access and the possibility that residents could become isolated during a major incident.

The addition of a massive regional transmission hub introduces risks that include:

- Transformer fires;
- Hazardous materials incidents;
- Wildfire potential;
- Road closures and construction impacts;
- Emergency exclusion zones;
- Simultaneous severe weather events.

A project intended to enhance electric reliability elsewhere should not create a single point of failure for public safety. Community resilience and public safety are themselves elements of reliability.

Mischaracterization of the Surrounding Community

Valley Link project representatives have repeatedly suggested that very few residents are affected and at one point indicated that only ten properties would experience direct impacts. This characterization misrepresents the reality of the Richardsville community.

Hundreds of homes are located along Eleys Ford Road and adjoining roads, with many additional residences situated on secondary roads and private drives. The area consists of established neighborhoods, farms, churches, businesses, and historic properties connected by a limited roadway network.

Any assessment that focuses only on immediately adjacent parcels fails to account for the broader population whose safety, property rights, quality of life, and access to emergency services will be affected.

Reliability Should Not Create New Vulnerabilities

PJM's responsibility extends beyond electrical engineering. A project justified in the name of reliability should not:

- Reduce community resilience;
- Increase dependence upon a single access route;
- Expose residents to avoidable emergency risks;
- Place critical infrastructure in locations lacking sufficient supporting infrastructure;
or
- Create conditions in which residents may become isolated during emergencies.

Reliability should not be measured solely in terms of electrical transmission. It must also account for the resilience and safety of the communities expected to host these facilities.

Inconsistency with Local Planning and Agricultural Zoning

The proposed Yeat Substation is inconsistent with the intent and objectives of Culpeper County's Comprehensive Plan and the purpose of agricultural zoning, both of which were established to protect residents and preserve the rural character, natural resources, and quality of life of the County.

These policies were adopted specifically to guide development and to prevent incompatible land uses from being imposed upon established communities. They recognize that not every use is appropriate in every location and that the health, safety, and welfare of residents must remain paramount. The Richardsville area was planned and zoned for agricultural and rural residential uses, not for the siting of an industrial-scale regional transmission hub serving demand elsewhere.

To disregard these policies would undermine the purpose of local planning and land-use protections and effectively render meaningless the safeguards intended to protect communities from incompatible development. Comprehensive plans and zoning ordinances exist precisely to protect communities from being subjected to incompatible land uses. If those protections are set aside whenever a sufficiently large corporation seeks an exception, then the planning process itself loses its purpose.

Fundamental Land Use Incompatibility

The concerns described above are not issues that can be resolved through landscaping, buffers, traffic studies, or other superficial mitigation measures. The problem is the location itself.

Richardsville is a rural agricultural community that was never planned, zoned, or developed to host an industrial-scale regional transmission hub. No amount of mitigation can alter the underlying incompatibility between the existing character of the community and the proposed use.

The people of this community are not seeking to negotiate the terms under which this project becomes acceptable. Based on the realities of the surrounding area, we do not believe this project belongs here.

Continued Community Opposition

Residents of Culpeper County have consistently demonstrated their opposition through public meetings, engagement with elected officials, comments, and participation throughout the regulatory process. The community does not view this project as beneficial, nor does it believe that the burdens imposed upon the area are justified.

Citizens remain committed to participating fully in every stage of the administrative and legal processes available to them. Opposition to this proposal is broad, sustained, and deeply rooted. It is not temporary, nor is it subject to negotiation through promises of mitigation measures or financial incentives.

The residents of this community did not choose to become a sacrifice zone for infrastructure intended to serve regional demand elsewhere, and they will continue to

defend their homes, property rights, safety, and quality of life through every lawful means available.

Conclusion

The people of Richardsville are not asking how this project can be made acceptable. They are asking how this location was considered appropriate in the first place.

Richardsville is not vacant land. It is not an industrial corridor. It is not an empty landscape occupied by only a handful of residents. It is a thriving rural community with hundreds of families, farms, churches, businesses, and historic properties connected by limited infrastructure and protected by volunteer emergency services.

A project designed to improve regional reliability should not do so by creating new vulnerabilities and imposing disproportionate burdens on a rural community that neither needs, benefits from, nor wants this infrastructure.

The question before PJM should not simply be whether the proposed facilities can be engineered. It should also be whether they belong here. Based upon the realities of the surrounding community, the answer is no.

Respectfully,

Kristen Borden

Co-Chair, Richardsville Coalition
Culpeper County, Virginia

ORANGE COUNTY, VIRGINIA

BOARD OF SUPERVISORS

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EDUARD M. VAN HOVEN, DISTRICT TWO
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GLENDIA BRADLEY PAUL
COUNTY ADMINISTRATOR

PHONE: (540) 672-3313
FAX: (540) 672-1679



MAILING ADDRESS:
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ORANGE, VA 22960

PHYSICAL ADDRESS:
R. LINDSAY GORDON III BUILDING
112 WEST MAIN STREET
ORANGE, VIRGINIA 22960

orangecountyva.gov

June 26, 2026

Valley Link LLC (via email)

Re: Joint Opposition to the Proposed Valley Link Joshua Falls to Yeat 765 kV Transmission Project

Dear Valley Link:

This letter is to express the joint opposition of the Orange County Board of Supervisors (Board), Virginia State Senator Bryce Reeves, and Virginia State Delegates Phillip Scott and Karen Hamilton to the proposed Valley Link Joshua Falls to Yeat 765 kilovolt (kV) transmission project, commonly referred to as JF2Y, as currently proposed or in any substantially similar configuration that would traverse any portion of Orange County.

The Board has formally opposed this project, via unanimous Board Resolution, and has requested the support of its state legislative delegation in that opposition. This joint letter reflects a shared position: JF2Y would place severe, permanent, and disproportionate impacts on Orange County residents, farms, historic landscapes, natural resources, and property owners while providing no direct local benefit to the County.

As currently proposed, JF2Y would send a new greenfield transmission line corridor through Orange County, effectively bisecting a substantial portion of the County's rural, agricultural, residential, scenic, and historic landscape. The proposed transmission line corridors do not meaningfully follow existing transmission rights-of-way in Orange County, but instead would introduce a new industrial-scale corridor through areas that the County has worked for years to protect.

Orange County expended significant resources to preserve its rural character, protect working lands, guide growth through its Comprehensive Plan, and avoid unnecessary fragmentation of agricultural and historic landscapes. JF2Y is inconsistent with this local vision. The Orange County Planning Commission has determined that the project is not in substantial accord with the Orange County Comprehensive Plan, and the Board has adopted that determination as part of the County's official position in a formal Board Resolution.

The public opposition in Orange County has been substantial and consistent. At a March 24, 2026, joint Board and Orange County Planning Commission public meeting, more than 1,000 citizens participated in person and online. Our residents spoke clearly about the damage this project would cause to homes, farms, businesses, schools, family land, and way of life. The Board and General Assembly delegation has also received significant additional public input by email, correspondence, calls and direct conversations reflecting sustained opposition to the project.

We are also concerned that the asserted need for JF2Y rests primarily on forecasted future load growth, including projected data center demand and electrification trends, rather than a demonstrated existing deficiency within Orange County. Orange County should not be asked to absorb severe and permanent local impacts based on projected regional demand that depends heavily on future development patterns outside the county. Since Northern Virginia data centers are creating the demand for new transmission infrastructure, the burden should not be shifted onto Orange County citizens and property owners without a far stronger showing of necessity, alternatives, and fairness.

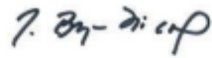
The harm is not merely theoretical or future-facing. The publication of broad proposed corridors has already clouded the use, sale, financing, and long-term planning of affected properties. Landowners within or near the proposed routes are now forced to account for the uncertainty and stigma of a possible 765 kV transmission corridor. In practical terms, large portions of Orange County property and citizens have been placed on hold while Valley Link continues to alter a project within the County that neither the elected officials or citizens support.

The project record also remains unsettled. The proposed Yeat endpoint has shifted to Culpeper County and still requires further approvals, including confirmation through PJM's process that the changed location remains within the scope. Valley Link has also indicated that the Joshua Falls endpoint is being moved and will require a separate approval process. It remains unclear whether that relocation also requires further PJM approval. These unresolved endpoint issues are an additional procedural concern. Even if those approvals are later obtained, Orange County's opposition remains unchanged. The problem is the proposed routing of this project through Orange County.

We ask Valley Link to give substantial weight to Orange County's Board and Legislative Delegation formal opposition, the Planning Commission's Comprehensive Plan determination, the documented public opposition, and the disproportionate local impacts this project would impose. We also expect these issues to be fully considered in any PJM, SCC, or related review of the project, including full consideration of alternatives that avoid Orange County, better use existing corridors, reduce local harm, and place infrastructure burdens closer to the alleged load centers and beneficiaries driving the asserted need. Orange County should not be treated as a pass-through corridor for infrastructure designed primarily to serve load growth in Northern Virginia and elsewhere.

For these reasons, we oppose the proposed Valley Link Joshua Falls to Yeat 765 kV transmission project as currently proposed, and we stand together in urging that this devastating transmission line not be routed through Orange County.

Respectfully,



J. Bryan Nicol
Chair, Orange County Board of Supervisors



Bryce Reeves
Senator, Virginia Senate



Phillip Scott
Delegate, Virginia House of Delegates



Karen Hamilton
Delegate, Virginia House of Delegates

cc:
Virginia State Corporation Commission
PJM Interconnection, L.L.C.
Office of the Governor
Virginia Chief Energy Officer
Virginia Department of Energy
Culpeper County Board of Supervisors
Campbell County Board of Supervisors
Orange County Board of Supervisors
Orange County Planning Commission

From: Doug Chapman

Sent: Monday, June 29, 2026 10:09 PM

To: Anders, David <David.Anders@pjm.com>; Customer Service (Internet) <custsvc@pjm.com>

Subject: Comment on Scope Change -Joshua Falls-Yeat (2024 RTEP Window 1)

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Please provide my comments to the PJM Board of Managers before the expected July vote on the Joshua Falls-Yeat scope change.

Dear PJM Board,

I am writing about Dominion Energy's original Valley Link proposal to PJM, which was approved in early 2025, creating a high-voltage reliability solution to power Northern Virginia data centers. Today, the "Joshua Falls-to-Yeat" segment has shifted to predominantly greenfield construction, with taller 765 kV structures and altered routes. Due to the scope change, I question the feasibility of the entire line and both substations.

I understand Valley Link submitted proposals during PJM Interconnection's Regional Transmission Expansion Plan (RTEP) window, and PJM approved the project in February 2025 as a public necessity to address surging energy demands due to data centers in Northern Virginia, primarily Loudoun County and Prince William County. In this proposal, the lines were maximizing **existing infrastructure and minimizing new greenfield impacts**.

Today, the routes have completely changed. The routes are shifting to a majority of greenfield from the original brownfield route, creating a detrimental impact on the following nine counties.

- **Campbell County** (origin point at Joshua Falls)
- **Appomattox County**
- **Buckingham County**
- **Fluvanna County**
- **Goochland County**
- **Louisa County**
- **Orange County**
- **Spotsylvania County**
- **Culpeper County** (termination point/proposed substation)

These rural counties will bear the brunt of the Joshua Falls-to-Yeat project, both from the land use perspective, as well as financially, as they will be paying to cover the cost for power that won't go to the local communities. Instead, the lines and substations will fuel the massive data center industry in Northern Virginia.

I ask that the Board consider the feasibility, constructability, endpoint land acquisition, local opposition, and in-service date risks, as they should be taken into account due to the proposed scope change by Valley Link.

Additionally, I ask that the Board insist that local communities approving data centers be required to provide their own generating sources for those data centers. Why should nine rural counties be forced to bear the brunt of power supply for data centers in northern Virginia?

Sincerely,

Dr. P. Douglas Chapman

Lignum, VA



From: Lane.E.Carr@dominionenergy.com <Lane.E.Carr@dominionenergy.com>
Sent: Tuesday, June 30, 2026 9:29 AM
To: LaToya Smith <lsmith@orangecountyva.gov>;
george.t.jamerson@dominionenergy.com; Robert.E.Richardson@dominionenergy.com
Cc: kelsey.bagot@scc.virginia.gov; jehmal.hudson@scc.virginia.gov;
samuel.towell@scc.virginia.gov; Customer Service (Internet) <custsvc@pjm.com>;
abigail.spanberger@governor.virginia.gov; vaenergy@energy.virginia.gov;
TUNDERWOOD@CULPEPERCOUNTY.GOV; GDEAL@CULPEPERCOUNTY.GOV;
PBATES@CULPEPERCOUNTY.GOV; DLEE@CULPEPERCOUNTY.GOV;
mbrown@culpepercounty.gov; dpayne@culpepercounty.gov;
kfarrish@CULPEPERCOUNTY.GOV; tklawton@co.campbell.va.us;
cawatts@campbellcountyva.gov; mwcline@campbellcountyva.gov;
jrhardie@co.campbell.va.us; krbrown@campbellcountyva.gov;
pedowdy@campbellcountyva.gov; jacarwile@campbellcountyva.gov; Jason Capelle
(External) <>; Ed Van Hoven <evanhoven@orangecountyva.gov>; Keith Marshall
<kmarshall@orangecountyva.gov>; Crystal Coleman <ccoleman@orangecountyva.gov>;
Bryan Nicol <bnicol@orangecountyva.gov>; John M. Rhett <jrhett@orangecountyva.gov>;
Brandon Van Hoven <bvanhoven@orangecountyva.gov>; Jordan Marshall
<jmarshall@orangecountyva.gov>; Faryn Carpenter Raines
<fcraines@orangecountyva.gov>; Frank DiPasquale <fdipasquale@orangecountyva.gov>;
Mills, David E <David.Mills@pjm.com>; senatorreeves@senate.virginia.gov;

delkhamilton@house.virginia.gov; DelPScott@house.virginia.gov; Glenda Bradley Paul
<gpaul@orangecountyva.gov>; Alyson Simpson <asimpson@orangecountyva.gov>

Subject: RE: Joint Opposition to the Proposed Valley Link Joshua Falls to Yeat 765 kV
Transmission Project

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that appears malicious.

Thank you. This has been received and shared with Valley Link LLC management. It will be
included in the SCC filing.

Lane Carr

Siting & Permitting Technical Advisor, Electric Transmission

Dominion Energy

Cell: 804-310-9658



Communications sent in relation to Valley Link Transmission Company, LLC activities.

From: LaToya Smith <lsmith@orangecountyva.gov>

Sent: Friday, June 26, 2026 4:30 PM

To: Lane E Carr (Services - 6) <Lane.E.Carr@dominionenergy.com>; roya.smith@erm.com
[EXTERNAL] <roya.smith@erm.com>; Jake Rosenberg <jake.rosenberg@erm.com>; Caitlin

C Watson (Services - 6) <caitlin.c.watson@dominionenergy.com>; George T Jamerson (Services - 6) <george.t.jamerson@dominionenergy.com>; Robert E Richardson (Services - 6) <Robert.E.Richardson@dominionenergy.com>

Cc: kelsey.bagot@scc.virginia.gov; jehmal.hudson@scc.virginia.gov; samuel.towell@scc.virginia.gov; custsvc@pjm.com; abigail.spanberger@governor.virginia.gov; vaenergy@energy.virginia.gov; TUNDERWOOD@CULPEPERCOUNTY.GOV; GDEAL@CULPEPERCOUNTY.GOV; PBATES@CULPEPERCOUNTY.GOV; DLEE@CULPEPERCOUNTY.GOV; mbrown@culpepercounty.gov; dpayne@culpepercounty.gov; kfarrish@CULPEPERCOUNTY.GOV; tklawton@co.campbell.va.us; cawatts@campbellcountyva.gov; mwcline@campbellcountyva.gov; jrhardie@co.campbell.va.us; krbrown@campbellcountyva.gov; pedowdy@campbellcountyva.gov; jacarwile@campbellcountyva.gov; Jason Capelle (External) <>; Ed Van Hoven <evanhoven@orangecountyva.gov>; Keith Marshall <kmarshall@orangecountyva.gov>; Crystal Coleman <ccoleman@orangecountyva.gov>; Bryan Nicol <bnicol@orangecountyva.gov>; John M. Rhett <jrhett@orangecountyva.gov>; Brandon Van Hoven <bvanhoven@orangecountyva.gov>; Jordan Marshall <jmarshall@orangecountyva.gov>; Faryn Carpenter Raines <fcraines@orangecountyva.gov>; Frank DiPasquale <fdipasquale@orangecountyva.gov>; david.mills@pjm.com; senatorreeves@senate.virginia.gov; delkhamilton@house.virginia.gov; DelPScott@house.virginia.gov; Glenda Bradley Paul <gpaul@orangecountyva.gov>; Alyson Simpson <asimpson@orangecountyva.gov>

Subject: [EXTERNAL] Joint Opposition to the Proposed Valley Link Joshua Falls to Yeat 765 kV Transmission Project

DO NOT CLICK

This message is not from Dominion Energy.

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Uncertain? Report with PhishAlarm.

We respectfully request that the attached joint letter be transmitted to the Valley Link LLC member CEOs.

Additionally, we ask that this joint letter of opposition be included in the official file for the Joshua Falls to Yeat Transmission Line Project so that it is made part of the formal record for this matter.

Thank you for your attention to this request.



LaToya M. Smith

Chief Deputy Clerk &
Administration Office Manager

County of Orange, Virginia

County Administration

T (540) 672-3313

F (540) 672-1679

orangecountyva.gov

[orangecountyva.gov]

PJM Board of Managers:

I am writing to you on behalf of my family that does not want Valley Link Joshua Falls to Yeat project. Between my wife and me, there are 62 family members that live in Richardsville, located in the County of Culpeper Virginia. It's a very unique rural community we call home. Beginning with our great, great, great grandparents and now all of us. Richardsville is where we have lived our entire lives. As you can see, we love our rural home life where most of our families have stayed and are raising their families here! There are other large families like ours that have stayed, along with our neighbors, who have found this as a place they love and have put their roots here. Valley Link wants Yeat substation and the 765KV lines located in our rural community. This would have a very devastating impact on our community, our health, safety, environment, habitat, waterways, forest, historic areas, lands, homes and our peaceful way of life.

Valley Link received and answered questions in a Town Hall that was held on May 19, 2026, by the Culpeper County Board of Supervisors, who asked the questions while we citizens were in attendance. This occurred after a show and tell by Valley Link held in March at Brandy Station Volunteer Fire Department. This was only done after it was leaked that Fauquier County rejected the Yeat substation and now Valley Link plans to move it to the community of Richardsville. We had no idea about the 765KV line, and now an added substation. Many received no notice or only got a one day notice this event was occurring. This is dishonest and not forthcoming with information that affects us and it definitely shows that their trust is questionable. The representatives could not answer many questions or concerns that needed to be answered. At the Town Hall many questions went unanswered or not in true form, incompletely or not at all. The biggest of all answers was that we were told this project is to produce and provide the electric power needed for the Data centers located in Loudon County and Northern Virginia. No electric power transmitted is for Culpeper or the other eight rural Counties this project would consume. One would think this alone is devastating enough, but no! Valley Link stated the Yeat substation would be the backbone of this project with spines that would run east and west. Which means more devastation to our community. Towers, lines, increase in size of substation, and safety concerns. Phase 1 substation 127 acres. Dominion purchased 400 plus acres. Common sense shows us how this will progress if not stopped.

As a firefighter/medic for 56 years with the Richardsville Volunteer Fire Department & Rescue Squad, Inc. (RVFD&RS), I have great concerns the substation along with the 765KV line could potentially produce a grave emergency for all our families. Our community is heavily forested; we all live among the trees. Eleys Ford Road is our only route of travel for

motor vehicles and it's a small two-lane road that is sixteen miles in length with only three outlets. Richardsville Volunteer Fire Department & Rescue Squad, located near the center of the community, will be responsible to guide citizens to these outlets during an emergency. The first outlet is three miles away going west and is within a half-mile of the proposed Yeat substation site. The next outlet is four miles going east, located in Spotsylvania County. If a large-scale emergency were to occur at the proposed sub-station site, it easily has the potential to block all evacuation routes. This could have deadly consequences! Our agency would be all alone to protect our families and neighbors' lives and homes making the task of mitigating the emergency more difficult. Other fire & EMS agencies would not be able to gain access to assist with emergency operations required. I am sure Valley Link has not even considered these safety hazards. No one has spoken to RVRFD&RS about these issues that are real and legit! It shows they don't do their homework thoroughly but do it recklessly. Come see for yourselves.

Our Board of Supervisors knows how unique our community is. They understand the magnitude of the devastation our community would suffer if the substation and the 765KV lines were here. That is why they immediately adopted a "Resolution" in public record opposing the entire Valley Link project, letting Valley Link know they oppose it upfront. Subsequently, they submitted a letter to PJM stating their opposition to the project.

Richardville's rural location is not conducive to any type of industry, much less the huge scale operations that Dominion's Valley Link has planned. At present, the only businesses located near the planned substation site are there precisely due to the rural nature of the area; The Salvation Army Rappahannock Retreat and Camp, that brings intercity children to the country for respite care, ChildHelp residential facility for abused children and the Rappahannock River Campground where visitors enjoy our scenic rivers.

Valley Link's Joshua Falls to Yeat project is planned solely for private businesses up north, who are consuming so much energy for their gain in wealth at the expense of destroying all the innocent people's lives who have worked hard just to have a home, land and family. The lives and the future of our children and their children will be taken away forever. Valley Link still doesn't provide any documentation about our health concerns, ELF, EMF, stray voltage they call it. They stated recently "If you get shocked give them a call". REALLY! You only hear from their people who state the danger is inconclusive. Then, they say it's safe? Which is it? Outside agencies have studies about the health effects with facts that Valley Link does not wish to use. Environmental impact studies, our properties and homes impacts, water, habitat, wetlands, forest filtration by nature being taken away, our historic waters and land impacted. Where are the answers? Our lives, our families, and the entire

community's future way of life will be gone forever! Why should innocent people be punished because of the greed and mistakes that others have made in other regions of Virginia. Aren't human lives of an entire community worth saving over any amount of money or material thing? I hope you feel and say they are. Say NO to this devastating monstrosity that is being proposed? I pray your answer is YOU WILL NOT allow it to proceed. Thank you for your time.

James B. Hurlock, Jr.

Richardsville, VA

June 1st, 2026
PJM Board of Managers
PJM Interconnection, L.L.C.
2750 Monroe Boulevard
Audubon, PA 19403

Re: Joshua Falls - Yeat Scope Change / Right-of-Way Feasibility and 2029 In-Service Risk

PJM Board of Managers:

We are property owners in Buckingham, Fluvanna, Louisa and Appomattox Counties with lands situated at or adjacent to critical segments of the proposed Joshua Falls-Yeat 765 kV transmission corridor. These include locations where all route options converge, as well as areas near major crossings such as Route 3.

We write to formally advise PJM that the contemplated scope modification introduces substantial implementation risks that warrant careful review prior to any Board approval of a revised project configuration. This communication does not reflect a broad objection from uninvolved parties. Our properties lie at points that appear essential to the viability of the routing alternatives under consideration. At locations where multiple routes converge or where critical crossings are required, the availability of particular parcels takes on heightened importance. Should those parcels prove unavailable through voluntary easement negotiations, the project timeline, construction assumptions, and prospects for achieving the targeted 2029 in-service date would be materially impacted.

We have no intention of granting voluntary easements for this undertaking. Should the proposal advance to the Virginia State Corporation Commission and result in issuance of a Certificate of Public Convenience and Necessity, we will assert every legal right available to us in any ensuing easement negotiations, condemnation actions, valuation proceedings, or related litigation. PJM must not presume that right-of-way acquisition over these lands will proceed on a voluntary, straightforward, or expeditious basis. Landowners further intend to contest, to the maximum extent allowed by law, whether eminent domain may be constitutionally exercised to take private property for a project that has been consistently described, promoted, and advanced primarily to accommodate private hyperscale data center expansion. Such a challenge may encompass whether the undertaking meets Virginia's public-use standards under the state constitution and, if necessary, will be pursued through all available avenues of appellate review, including before the Supreme Court of Virginia. This constitutes a genuine feasibility concern. A transmission initiative of this magnitude cannot be assessed solely on the basis of whether it would resolve identified reliability issues once hypothetically placed in service. PJM must also determine

whether the project can realistically be sited, permitted, acquired, litigated where required, and constructed within the necessary timeframe.

For this initiative, those risks are significant. The proposed Joshua Falls–Yeat corridor would entail construction of a new 765 kV greenfield line traversing extensive private property, encompassing sensitive historic districts and strategically important crossing locations. The effort would necessitate continuous right-of-way acquisition across numerous parcels. Opposition at convergence points or key crossings is not confined to isolated segments; it has the potential to undermine the practicality of entire route portions.

PJM should refrain from endorsing any scope modification predicated on an assumed 2029 in-service date without first obtaining a thorough, realistic evaluation of the right-of-way and litigation exposures now apparent along the revised corridor.

Prior to any approval, PJM should direct the project sponsors to address the following matters:

- Whether the 2029 in-service date continues to be attainable should landowners at route-convergence locations and major crossings decline to provide voluntary easements;
- Whether the project schedule accounts for contested condemnation proceedings, valuation disputes, judicial timelines, appeals, and any resulting construction delays stemming from right-of-way litigation;
- The extent to which multiple route alternatives rely upon the same or closely proximate parcels in counties where landowners have indicated opposition to voluntary easement grants;
- Whether the project sponsors have developed alternative alignments capable of bypassing parcels where voluntary acquisition appears improbable;
- Whether the projected project cost incorporates the reasonably anticipated expenses associated with contested easement acquisition, litigation, delays, access restrictions, and any necessary route adjustments;
- Whether existing transmission corridors, existing substations, or other configurations could lessen reliance on new greenfield right-of-way over private land;
- Whether PJM has analyzed the aggregate execution risk arising from opposed route segments in these counties, and widespread landowner and county-level resistance along the corridor.

These considerations are not speculative. They represent identifiable risks to execution and feasibility that are already known prior to Board action. The landowners submitting this

letter are formally notifying PJM that these outstanding right-of-way, litigation, and routing issues will form part of the official record in any subsequent Virginia SCC proceeding if the scope change is approved and a CPCN application is later submitted. That record will demonstrate that PJM received advance notice—before scope-change approval—of unresolved feasibility issues surrounding route acquisition, contested properties at critical convergence zones, active landowner opposition.

PJM should withhold approval of the Joshua Falls–Yeat scope change unless and until the project sponsors establish that the revised route configurations are feasible, constructible, and realistically capable of meeting the stated 2029 in-service date.

Landowner Signatures on Following Pages

[illegible]

[illegible]

The PJM Board of Managers
c/o David E. Mills, President & Chief Executive Officer
PJM Interconnection, LLC 2750 Monroe Blvd. Audubon, PA 19403

SUBJECT: Joshua Falls–Yeat Scope Change / Revised Proposal 820 No Longer Reflects the Project Before PJM / Request to Reject or Defer Approval

Attn: David Mills

I write regarding the pending scope change for the Joshua Falls–Yeat 765 kV transmission project. PJM should not approve the proposed scope change in its current form.

The project now before the Board is not the project PJM selected out of the 2024 Window 1 RTEP. It is not a minor refinement. It is not merely a shorter route. It is a materially different transmission project with unsettled endpoints, materially altered routing assumptions, changed substation configurations, new land-use risks, new approval dependencies, and a required in-service date that appears increasingly unrealistic.

PJM selected Revised Proposal 820 based on a specific project package. That package included a new Joshua Falls–Yeat 765 kV line from the existing Joshua Falls station to a proposed Yeat substation in Fauquier County, associated 500 kV and 230 kV cut-ins, a Joshua Falls substation upgrade, and a new 765/500/230 kV Yeat substation. PJM’s own 2024 constructability materials evaluated Proposal 820 on that basis.

That is not the project now being advanced. The current proposal moves the Yeat endpoint approximately 15 miles south into Culpeper County, removes the 230 kV yard, changes the 500 kV topology, cancels the Vontay loop-in, redirects previously associated infrastructure, changes AEP/Dominion mileage assumptions, and now appears to involve a relocated Joshua Falls starting point that was not clearly presented to TEAC as part of the May 2026 Yeat scope change.

The Board should not approve a scope change that treats these changes as though they are ordinary implementation details. They are not. They go directly to the feasibility, constructability, cost, schedule, and reliability assumptions underlying the original selection.

PROJECT OVERVIEW

The project overview in PJM’s 2024 constructability review described the new Joshua Falls–Yeat 765 kV line as being constructed from the existing Joshua Falls station in Campbell County to the proposed Yeat substation in Fauquier County. The proposed Yeat station was described as a 65-acre station located on undeveloped agricultural land in rural Fauquier County.

The pending scope change no longer reflects that evaluated project. The proposed Yeat endpoint is now Culpeper Yeat. The proposed 230 kV component at Yeat is removed. The 500 kV cut-ins are changed. Previously approved and later-planned Yeat-related topology is modified or canceled. The routing is no longer the same evaluated package. And now, separate project materials indicate that the existing Joshua Falls station itself is proposed to be relocated due to

space constraints, with that relocation and associated work to be completed under a separate Appalachian Power project and separate SCC filing.

If both endpoints have changed or are unsettled and the routing is entirely greenfield then the project before PJM is not Revised Proposal 820 as selected. It is a new practical project being assembled from pieces after the fact.

RIGHT-OF-WAY / LAND USE RISK ANALYSIS

PJM's original 2024 constructability review stated that the Joshua Falls–Yeat 765 kV line was approximately 138 miles and that 66% of the route, approximately 91 miles, would either parallel or use existing right-of-way. PJM's constructability review also stated that approximately 34% of the 138-mile 765 kV run was greenfield construction and that the remainder mostly paralleled existing ROW.

That original risk profile no longer appears to apply. The current proposed configuration materially changes the project's land-use profile. The new endpoint in Culpeper County is a contested greenfield terminal site opposed by the host county. The revised routing introduces new landowner impacts, new alternate routes, new areas of convergence, and additional communities that were not asked to host the project as originally selected.

The landowner opposition submitted to PJM is directly relevant to this analysis. Landowners in Orange, Louisa, Culpeper, and Spotsylvania Counties have already informed PJM that they do not intend to voluntarily grant easements and intend to exercise all available legal rights in any SCC, easement, condemnation, valuation, or appellate proceeding. This is not an abstract public relations concern. It is a right-of-way acquisition and execution risk.

PJM should not assume that acquisition of a new 765 kV greenfield corridor across these properties will be voluntary, routine, or timely. A route with multiple convergence points, contested crossings, and organized landowner opposition creates real schedule and constructability risk.

If PJM would not have selected Revised Proposal 820 had it been presented as an all-or-nearly-all-greenfield routing exercise with contested land acquisition across multiple counties, then PJM should not approve that result now through a scope change.

ENVIRONMENTAL, HISTORICAL, AGRICULTURAL, AND COMMUNITY RISK ANALYSIS

PJM's original constructability review recognized environmental risks, including potential impacts to FEMA floodplains, streams, wetlands subject to federal permitting, woodlands with potential habitat for federally listed species, and coordination with wildlife and conservation interests.

The current scope change increases rather than resolves these concerns. The proposed Culpeper Yeat endpoint is located in the Richardsville area, a rural, historically significant, environmentally sensitive community closely tied to the Rapidan and Rappahannock River landscapes. Culpeper County has formally opposed the siting of the proposed Yeat substation in

this location due to land use, environmental, historical, agricultural, community, and constructability concerns.

The Board should not treat relocation to Culpeper as reducing impacts simply because it shortens one segment of the line. Shortening mileage is not the same thing as reducing total project risk. Moving a major terminal substation into a host county that has formally opposed the site introduces a serious feasibility risk that did not exist in the same way when Proposal 820 was evaluated as a Fauquier endpoint.

The scope change appears to transfer unresolved siting conflict from one locality to another while presenting the transfer as a project improvement. PJM should not accept that framing.

TRANSMISSION LINE RISK ANALYSIS

PJM's 2024 constructability review stated that, given extensive reuse of existing ROW, transmission line construction risks were low and limited to issues such as removal or salvage of existing overhead transmission infrastructure and potential design limitations for reuse of existing infrastructure and assets.

That conclusion cannot simply be carried forward to the current proposed project. The current configuration appears to rely on a materially different routing concept. It shortens the line in a numerical sense, but it also introduces new routing assumptions, alternate corridors, contested land acquisition, and uncertain endpoint dependencies. The current project is not merely a reduced version of the original line. It is a reconfigured line with different transmission consequences.

The May 2026 TEAC materials indicate that Culpeper Yeat will receive the new 765 kV Joshua Falls–Yeat line, tie into the existing 500 kV system, receive revised 500 kV interconnections, and no longer include the original 230 kV yard. The result is not a small local reliability facility. It is a 765/500 kV bulk-transfer node.

A transmission line risk analysis must therefore consider not only whether a line can be drawn between two points, but whether the revised configuration remains the least-risk, most feasible, and most constructible way to address the modeled reliability issue by the required date.

SUBSTATION RISK ANALYSIS - YEAT

PJM's 2024 constructability review evaluated Proposal 820 as a specific, integrated transmission solution. The proposed Yeat station was presented as a new 65-acre greenfield substation in Fauquier County, interconnected to the existing 500 kV and 230 kV system as part of a single topology. PJM's independent review of cost, constructability, environmental impacts, schedule, and land-use risk was based upon that configuration, not the substantially different project now before the Board.

Since selection of Revised Proposal 820, the project has undergone a series of significant revisions. The proposed Yeat substation has been relocated approximately fifteen miles south into Culpeper County after the original host jurisdiction raised substantial concerns. The 230 kV yard has been removed, multiple supporting facilities have been reconfigured or eliminated, and

previously approved 2024 and 2025 RTEP projects now require modification to accommodate the new endpoint. These are not isolated engineering refinements. They represent a material change to the topology that PJM originally evaluated and approved.

Equally significant, the relocation itself is now contested by the new host jurisdiction. Culpeper County has formally opposed the proposed substation location and has asked PJM not to approve the pending scope change. Unlike the project evaluated in 2024, the revised configuration now depends upon a terminal site that lacks local support and whose future remains uncertain.

PJM should therefore evaluate whether the revised configuration remains the lowest-cost, most constructible, and least-risk solution under the same criteria that governed the original competitive selection. A project selected because of its favorable cost, constructability, and schedule characteristics should not be transformed into a fundamentally different project after selection without a comparable level of scrutiny. If the proposal presented today had originally consisted of a contested greenfield terminal in Culpeper County requiring reconfiguration of previously approved transmission topology, it is far from clear that Proposal 820 would have received the same evaluation or selection.

SUBSTATION RISK ANALYSIS - JOSHUA FALLS

The Joshua Falls issue is now equally important. PJM's original 2024 constructability review described the Joshua Falls component as adding two 765 kV breakers at Joshua Falls. It specifically warned that, due to the mountainous terrain at the Joshua Falls substation, any expansion to permit new line terminations would require significant civil work and costs. PJM also recognized that procurement of EHV equipment could lead to unexpected schedule delays and additional cost due to extended lead times.

As of the May 2026 TEAC scope-change materials, the Joshua Falls work was still described as adding two 765 kV breakers at Joshua Falls and expanding the substation to add those breakers. The May TEAC materials did not appear to present a formal scope-change analysis for relocating the Joshua Falls station itself.

Yet Valley Link project materials now indicate that, due to space constraints, the existing Joshua Falls Station is proposed to be relocated, and that the relocation and associated work will be completed under a separate Appalachian Power project with a separate SCC filing.

That is a major issue. If the approved 2024 project assumed upgrades at the existing Joshua Falls station, but the project now requires a relocated Joshua Falls terminal facility on a separate site, then the starting point of the line has materially changed. That change should not be separated from PJM's review of the Yeat scope change. The two endpoints are functionally dependent components of the same 765 kV transmission path.

PJM should not approve a scope change for one end of the line while failing to evaluate whether the other end of the same line has also changed, requires separate approval, increases costs, creates new land-use impacts, and adds schedule risk. If the relocated Joshua Falls facility is necessary for the line to function, then it is not an unrelated side project. It is part of the practical start point of Joshua Falls–Yeat.

COST REVIEW

PJM's original cost review for Proposal 820 was based on a high-level conceptual design and included a 30% contingency. PJM's independent estimate for Proposal 820 totaled approximately \$1.244 billion, compared to the proposing entity's estimate of approximately \$1.017 billion.

Those cost estimates were based on the project as evaluated at that time. The project now appears materially different. The Yeat endpoint moved. The 500 kV topology changed. The 230 kV component was removed. The 765 kV line routing changed. The AEP/Dominion mileage split changed dramatically. The Joshua Falls station may now require relocation to a separate site and separate SCC filing.

Those changes materially undermine the cost assumptions underlying the original selection.

PJM should require a new cost review that accounts for:

1. Greenfield land acquisition across the revised corridor;
2. Contested easement acquisition and condemnation costs;
3. Litigation-related delay and access costs;
4. The cost of a relocated Joshua Falls substation;
5. New 765 kV facilities required to connect a relocated Joshua Falls terminal;
6. Reconfiguration or deconstruction costs at the existing Joshua Falls site;
7. Additional SCC filing costs and schedule dependencies;
8. Revised 500 kV interconnections at Culpeper Yeat;
9. Removal, cancellation, or modification of prior 2024 and 2025 selected components;
10. Costs associated with local opposition and potential project delay.

It is not sufficient to claim cost savings from shortening the line if the revised project introduces new substation construction, new endpoint risk, new litigation risk, and new dependencies not included in the original evaluation.

SCHEDULE REVIEW

PJM's original 2024 constructability review assessed Proposal 820 as having medium-high schedule risk because the project had a notable amount of 765 kV greenfield construction and expected environmental and local county issues along the routing process.

That was before the current scope change. The current project faces substantially greater schedule risk:

1. The Yeat endpoint has moved to a host county that has formally opposed the site;
2. The Culpeper Yeat substation requires local land-use approval;
3. The revised corridor faces organized landowner opposition; Multiple landowners have stated they will not voluntarily grant easements;
4. Condemnation, valuation, and appellate issues may be litigated;
5. The Joshua Falls starting point may require relocation;
6. The relocated Joshua Falls work may require separate local approval and separate SCC filing;

7. The project may now require multiple interdependent SCC proceedings;
8. Prior 2024 and 2025 project assumptions may require reconfiguration;
9. The project still claims a June 1, 2029 required in-service date.

A required in-service date does not make an unsettled project constructible. The Board should ask whether this project can realistically be sited, permitted, acquired, litigated, engineered, procured, constructed, and energized by June 2029. If the answer depends on assuming voluntary easements, uncontested land-use approvals, no meaningful litigation, no delay at Joshua Falls, no delay at Culpeper Yeat, and no major redesign, then the schedule assumption is not realistic.

PROPOSING ENTITY EXPERIENCE AND CAPABILITY

PJM's 2024 review concluded that Transource had significant experience with the proposed equipment and capabilities to construct Proposal 820 as submitted.

The phrase "as submitted" is critical. The project now before PJM is not Proposal 820 as submitted. It is a reconfigured project being advanced through a scope-change process after public siting conflict emerged around the original endpoint. The Board should not rely on a 2024 capability conclusion tied to a different project configuration to approve a materially altered 2026 scope.

Even a capable transmission developer cannot eliminate the risks created by a contested endpoint, a potentially relocated starting point, organized landowner refusal, separate SCC proceedings, local land-use uncertainty, and a compressed required in-service date.

RECONFIGURATION OF 2024 AND 2025 RTEP ASSUMPTIONS

PJM should also evaluate how the proposed scope change affects previously approved and selected 2024 and 2025 RTEP projects.

The approved 2024 project placed Yeat in Fauquier County and included a 765/500/230 kV substation with specific 500 kV and 230 kV cut-ins. Later 2025 planning concepts evaluated additional Yeat-associated infrastructure, including additional 765 kV concepts and Vontay-related topology. The April and May 2026 TEAC materials now remove, redirect, or cancel several of those Yeat-associated functions.

That means the scope change is not isolated. It changes the grid topology around Yeat. It changes how prior selected or proposed projects interact. It changes what future models assume. It changes the foundation on which other transmission planning may be built.

PJM should not approve the scope change until it has clearly explained:

1. Which 2024 RTEP baseline components are modified, removed, or replaced;
2. Which 2025 RTEP projects or assumptions must be re-modeled;
3. Given the previously selected projects assumed a Fauquier Yeat Endpoint, whether the Culpeper Yeat endpoint changes transfer limits, reliability margins, redundancy, or future expansion needs;
4. Whether removing the Vontay loop-in changes the reliability value of the project;

5. Whether the current configuration remains equivalent to the selected 2024 solution.

THE BAIT-AND-SWITCH PROBLEM

PJM should confront the central issue directly. The project selected in 2024 was evaluated as a defined package. It had a Fauquier endpoint, a particular substation configuration, a particular line length, a particular use or paralleling of existing ROW, a particular division of utility responsibilities, and a specific Joshua Falls upgrade.

The project now presented to the public and to PJM is materially different. The endpoint moved. The route changed. The 500 kV topology changed. The Vontay concept was canceled. Kraken was redirected. The AEP portion shrank dramatically. The Joshua Falls starting point may now require relocation and separate approval.

That sequence has created a serious public confidence problem. PJM should not permit a project to be selected under one set of assumptions and then materially transformed through scope-change proceedings into a different project that imposes new burdens on counties and landowners who were not asked to host the originally approved configuration.

If the current project had been submitted in 2024 as a new greenfield 765 kV corridor with an unsettled Joshua Falls start point, contested routing across multiple counties, a new Culpeper endpoint opposed by the host county, uncertain local approvals, and no 230 kV local-serving yard at Yeat, it is highly doubtful PJM would have evaluated it the same way or selected it on the same basis. That is why the Board should reject or defer the scope change.

REQUEST TO THE PJM BOARD

For the reasons stated above, I respectfully request that the PJM Board of Managers:

1. Decline to approve the Joshua Falls - Yeat scope change;
2. Defer any vote until PJM conducts and publicly presents a full constructability, cost, feasibility, and schedule reassessment of the current project as actually proposed;
3. Require Valley Link, Dominion, Appalachian Power, AEP, and any other responsible project sponsor to explain whether the Joshua Falls starting point has materially changed and whether that change requires PJM scope-change review;
4. Require a full cost reassessment that includes the relocated Joshua Falls facility, separate SCC filing requirements, additional land acquisition, litigation, condemnation, and schedule-delay risks;
5. Require a full schedule reassessment of whether the project can realistically meet the June 1, 2029 required in-service date given unsettled endpoints, local opposition, right-of-way risk, and potential multiple SCC proceedings;
6. Require disclosure of how the revised Culpeper Yeat configuration affects previously selected 2024 and 2025 RTEP projects and assumptions;
7. Require analysis of alternatives that avoid a new greenfield 765 kV terminal site in Culpeper County and maximize existing corridors, existing substations, and less disruptive configurations;

8. Enter this letter and attachments into the materials considered by PJM staff and the PJM Board before any vote on the proposed scope change.

CONCLUSION

PJM is not being asked to approve a minor scope correction. PJM is being asked to approve a materially different project from the one selected in 2024.

The 2024 constructability review already identified medium-high constructability risk and medium-high schedule risk for Proposal 820 as submitted. The current project is more uncertain, more contested, more dependent on local approvals, more vulnerable to right-of-way litigation, and now potentially dependent on a relocated Joshua Falls starting point that was not fully vetted in the May 2026 TEAC scope-change presentation.

PJM should not approve this scope change by assuming away the very risks that now define the project. This project no longer reflects the Proposal 820 PJM selected. It should not be approved as though it does.

Michael Regan
Michael Regan

Enclosures:

1. Exhibit A – Culpeper County Board of Supervisors Letter to PJM Regarding the Joshua Falls–Yeat Scope Change
2. Exhibit B – Landowner Letter to the PJM Board of Managers Regarding Right-of-Way Feasibility and 2029 In-Service Risk
3. Exhibit C – PJM 2024 Window 1 Revised Proposal 820 Constructability and Cost Review Excerpt



**COUNTY OF CULPEPER, VIRGINIA
BOARD OF SUPERVISORS**

Tom Underwood, Chairman
302 North Main Street, Culpeper, VA 22701
Telephone: (540) 727-3427 Email: BOS@Culpepercounty.gov

June 4, 2026

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

Re: Joshua Falls–Yeat Scope Change / Culpeper Yeat Substation / 2024 RTEP Window 1

Members of the PJM Board of Managers:

On behalf of the Culpeper County Board of Supervisors, we write regarding the proposed scope change for the Joshua Falls–Yeat 765 kV transmission project and the associated proposed Culpeper Yeat substation.

The Board urges PJM not to approve the proposed scope change in its current form. As currently configured, the project lacks an acceptable terminal site in Culpeper County. On April 7, 2026, the Culpeper County Board of Supervisors adopted a formal resolution opposing the Valley Link Joshua Falls–Yeat 765 kV transmission line and specifically opposing the proposed Yeat substation in the Richardsville area of Culpeper County. That position was restated during the May 19, 2026, meeting with Valley Link representatives.

This opposition is based on specific land use, environmental, historical, agricultural, community, and constructability concerns surrounding the proposed Richardsville-area substation site and the associated 765 kV corridor.

The proposed scope change before PJM is not a minor modification. The April and May 2026 Transmission Expansion Advisory Committee (TEAC) materials reflect substantial revisions to the previously PJM approved configuration, including relocation of the Yeat substation approximately 15 miles south into Culpeper County from its originally contemplated location near Morrisville in Fauquier County, shortening of the proposed 765 kV greenfield corridor, removal of the originally planned 230 kV yard at Yeat, revised 500 kV interconnections, and cancellation or modification of multiple previously approved supporting elements. Those changes confirm that the project remains in flux. They also raise serious questions about whether the revised configuration is feasible, properly scoped, or adequately supported by settled planning assumptions.

The removal of the originally planned 230 kV yard at Yeat is significant because it appears to reduce or eliminate any direct local load-serving function previously associated with the proposed Culpeper site. The Board does not request that this component be restored. Rather, the removal underscores the Board's concern that the revised Culpeper Yeat substation is primarily a regional bulk-transfer facility that Dominion has represented as serving data center load growth in Northern Virginia, not infrastructure

Exhibit A – Culpeper County Board of Supervisors Letter to PJM Regarding the Joshua Falls–Yeat Scope Change

needed to serve local Culpeper County demand. The scope reduction at Yeat reinforces that concern. Culpeper County is already subject to the SCC-approved Culpeper Tech Zone 230 kV transmission project, which Dominion represented as necessary to serve data center load growth and area reliability in Culpeper, Orange, and Fauquier. That project includes new 230 kV infrastructure and related regional upgrades. Given that approved local reliability project, PJM should not approve a separate 765 kV scope change that places a major greenfield bulk-transfer substation in Culpeper while offering no clear local reliability benefit to County residents.

The proposed substation also raises serious future-expansion concerns. Regional Transmission Expansion Plan (RTEP) materials indicate that Yeat has been associated in prior configurations with multiple 765 kV connections and a 230 kV component as part of a broader long-term topology. Although portions of that scope have now been removed or modified, there is concern that approval of a Culpeper Yeat site could establish the foundation for additional future 765 kV loops, reinforcements, or other large-scale industrial transmission infrastructure in the Richardsville area. The currently revised configuration appears to rely on a single 765 kV connection into Yeat. If that connection is critical to regional transfer capability, will future reliability planning later reintroduce additional 765 kV looped infrastructure or reinforcements at Yeat to address redundancy, resilience, or contingency concerns? Culpeper County should not be asked to approve a site that appears limited today, only to become the foundation for a much larger transmission hub later. Such an arrangement is untenable for Culpeper County. The Richardsville area is rural, historically significant, environmentally sensitive, and closely tied to the Rapidan and Rappahannock River landscapes. The public opposition from area residents reflects legitimate concern that this project would permanently alter the character of the community. A 765 kV/500 kV substation on a large greenfield site is not a temporary impact. It is a permanent regional infrastructure node that could shape future land use and future transmission planning for decades.

The Board is also concerned that the current proposal appears to concentrate a major regional transfer function at a single new greenfield terminal location in Culpeper County. If the project is truly required for regional reliability by 2029, PJM should carefully evaluate whether a configuration dependent on a contested greenfield substation site, local land-use approvals, extensive right-of-way acquisition, and likely litigation can reasonably meet that required in-service date. A required in-service date is not the same thing as a feasible construction schedule.

During the May 2026 meeting with Valley Link representatives, Board members asked whether major PJM-approved transmission projects had ever later been canceled. Valley Link representatives responded to the Board that they were not aware of any such examples. The Board raises this issue because that representation is incomplete. PJM-approved projects are not immutable. PJM has previously delayed, revised, or removed major RTEP transmission projects when planning assumptions, timing, or reliability drivers changed. The Potomac-Appalachian Transmission Highline (“PATH”), a proposed 765 kV transmission project, and the Mid-Atlantic Power Pathway (“MAPP”) are examples of major PJM-approved transmission projects that were later removed from the RTEP after further analysis showed the underlying reliability drivers no longer supported the projects within PJM’s planning cycle. Culpeper County raises this point because PJM should not treat prior RTEP selection as a substitute for current feasibility review. Before approving this scope change, PJM should determine whether the revised Joshua Falls–Yeat configuration remains feasible, constructible, and justified given the host county’s formal opposition to the proposed terminal site. The County also notes that Valley Link representatives have stated that alternative electrically viable 500 kV corridor locations farther north could require additional routing through Culpeper County. The Board does not view that as a sufficient basis to approve the current Culpeper Yeat site. PJM should not treat the County’s rural residents as choosing between one unacceptable impact and another. Instead, PJM should require a more complete evaluation of alternatives

Exhibit A – Culpeper County Board of Supervisors Letter to PJM Regarding the Joshua Falls–Yeat Scope Change

that avoid a new greenfield 765 kV terminal site in Culpeper County and maximize existing transmission corridors and infrastructure.

Culpeper County's Comprehensive Plan emphasizes that development of future electrical transmission lines should be limited while meeting the electrical demands of the County, and that expansion within existing transmission line corridors should be the first option pursued. *See Culpeper County Comprehensive Plan, chapter 7, page 13* The proposed scope change is inconsistent with that planning principle.

For these reasons, the Board respectfully requests that PJM:

1. Decline to approve the proposed Joshua Falls–Yeat scope change in its current form;
2. Defer any PJM Board action until Valley Link/Dominion provide a full explanation of why the project requires a new greenfield terminal substation in Culpeper County;
3. Require a complete analysis of alternatives that do not depend on the proposed Culpeper Yeat substation site, including alternatives using the originally contemplated northern configuration or other existing 500 kV corridors and substations. The Board understands that the Joshua Falls–Yeat project selected in the 2024 RTEP Window 1 process was based on a different landing configuration than the Culpeper Yeat site now proposed. The Board further understands that the Culpeper Yeat landing configuration was presented later through the 2026 TEAC scope-change process, after the original PJM approval. While Dominion has stated that relocating Yeat south shortens the line, reduces costs, and avoids constraints north of the Rappahannock River, the Board cannot discount the significance of local opposition and siting impacts in that relocation decision. The currently proposed Culpeper site faces formal opposition from the host county and substantial public opposition from the Richardsville community. PJM should not approve a scope change that merely transfers unresolved siting conflict from one locality to another.
4. Require a clear explanation of what local reliability benefit, if any, the revised Culpeper Yeat configuration provides to Culpeper County residents after removal of the 230 kV yard;
5. Require disclosure of how the revised configuration interacts with the SCC-approved Culpeper Tech Zone 230 kV project and other approved or proposed regional transmission infrastructure;
6. Require Valley Link/Dominion to explain whether the revised scope remains feasible for the stated 2029 required in-service date, given equipment lead times, permitting, land acquisition, local land-use approvals, and foreseeable litigation;
7. Require Valley Link/Dominion to identify whether the Culpeper Yeat site is intended, or may later be used, to accommodate future 765 kV loops as proposed in existing RTEP documents, additional transmission lines, or other major future infrastructure not included in the current scope change;
8. Enter this letter and the Culpeper County Board's opposition into the materials considered by PJM staff and the PJM Board before any vote on the proposed scope change.

Culpeper County recognizes the importance of reliable electric service and regional transmission planning. However, regional reliability planning must be grounded in realistic siting, constructability, local land-use feasibility, and honest evaluation of impacts. A project that depends on a terminal site already rejected by the host county should not be advanced as though its feasibility is settled.

The proposed Culpeper Yeat substation is not a valid or acceptable landing site for this project. The Culpeper Board of Supervisors requests that PJM not approve the proposed scope change as currently presented.

Sincerely,



Tom Underwood, Chairman Culpeper County
Board of Supervisors Culpeper, Virginia

June 1st, 2026

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

Re: Joshua Falls - Yeat Scope Change / Right-of-Way Feasibility and 2029 In-Service Risk

PJM Board of Managers:

We are landowners in Orange, Louisa, Culpeper, and Spotsylvania Counties whose properties are located at or near critical portions of the proposed Joshua Falls - Yeat 765 kV transmission corridor, including areas where all route alternatives converge and areas of convergence near key crossings such as Route 3.

We write to place PJM on notice that the proposed scope change presents significant execution risk that should be evaluated before the PJM Board approves any revised configuration. This is not a general objection from distant observers. Our properties are located at points that appear important to the feasibility of the proposed routing options. Where multiple route alternatives converge and critical crossings occur the practical availability of specific parcels becomes especially important. If those parcels are not available through voluntary easement acquisition, the project schedule, constructability assumptions, and ability to meet the stated 2029 in-service date are directly affected.

We do not intend to voluntarily grant easements for this project. If the project proceeds to the Virginia State Corporation Commission (SCC) and a Certificate of Public Convenience and Necessity (CPCN) is granted, we intend to exercise all available legal rights in any subsequent easement acquisition, condemnation, valuation, or related court proceedings. PJM should not assume that right-of-way acquisition across these properties will be voluntary, routine, or timely. Landowners also intend to challenge, to the fullest extent permitted by law, whether eminent domain may constitutionally be used to acquire private property for a project repeatedly justified, marketed, and advanced to serve private hyperscale data center growth. That challenge may include whether the project satisfies Virginia's public-use requirements under the Virginia Constitution. If necessary, landowners intend to preserve and pursue those issues through appellate review, including review by the Supreme Court of Virginia. That is a material feasibility issue. A transmission project of this scale cannot be evaluated only by asking whether it resolves modeled reliability violations once assumed in service. PJM should also evaluate whether the project can realistically be sited, permitted, acquired, litigated if necessary, and constructed in time to meet the required in-service date.

For this project, those risks are substantial. The proposed Joshua Falls - Yeat corridor would require a new 765 kV greenfield transmission line across private land, including sensitive historical areas and key crossing points. The project would require continuous right-of-way acquisition across many parcels. Resistance at convergence points or major crossings is not isolated. It can affect the feasibility of entire route segments.

The current scope has changed substantially since the original 2024 Regional Transmission Expansion Plan (RTEP) Window 1 selection. The May 2026 Transmission Expansion Advisory Committee (TEAC) materials now reflect a materially different configuration, including relocation of the Yeat terminal site into Culpeper County and shortening of the proposed 765 kV corridor. These changes demonstrate that the project remains unsettled at this late stage and that the route and terminal assumptions supporting the original selection should not be treated as fixed or final. Notably, through the May 2026 TEAC materials, the Joshua Falls substation continued to be included as part of the project scope, with no apparent disclosure that the existing Joshua Falls substation may itself require relocation or separate approval.

Recent information indicates that uncertainty now exists not only at the Yeat endpoint, but also at the Joshua Falls starting point. We understand that the original solution was evaluated against modifications to the existing Joshua Falls 765 kV substation, including substation expansion. However, recent Valley Link project materials indicate that Appalachian Power now intends to relocate the Joshua Falls substation to a new site over two miles away. That relocation appears to require separate local land-use approval from the host county, a separate SCC application, construction of new 765 kV facilities to connect the relocated substation, and potentially deconstruction or reconfiguration of facilities at the existing Joshua Falls substation.

The project also faces a known terminal-site issue. Culpeper County has formally opposed the proposed Yeat substation in Culpeper County. We understand that the host county has already passed a resolution opposing both the Joshua Falls - Yeat line and placement of the Yeat substation in Culpeper County. That opposition does not replace our concerns as landowners, but it underscores that the proposed line faces risk at both the route level and the terminal-site level.

These developments materially increase the execution risk of the project. PJM should not evaluate the proposed Yeat relocation in isolation while the starting point of the same 765 kV line may also be moving, may require separate approval, and may introduce additional permitting, land acquisition, litigation, and construction dependencies. If both the beginning and ending points of the Joshua Falls - Yeat project are unsettled, then the routing assumptions between those endpoints cannot be treated as settled either, and the 2029 in-service date should not be considered a reliable assumption.

PJM should not approve a scope change based on an assumed 2029 in-service date without first requiring a realistic assessment of the right-of-way and litigation risks now evident along the proposed corridor.

Before approving the proposed scope change, PJM should require the project sponsors to address the following:

- Whether the 2029 in-service date remains realistic if landowners at route-convergence points and key crossings refuse voluntary easements;
- Whether PJM's schedule assumptions include contested condemnation proceedings, valuation disputes, court timelines, appeals, and construction delays resulting from right-of-way litigation;

- How many route alternatives depend on the same or nearby parcels in Orange, Louisa, Culpeper, and Spotsylvania Counties where landowners are opposed to voluntary easement acquisition;
- Whether the project sponsors have identified alternate alignments that avoid parcels where voluntary acquisition is unlikely;
- Whether the estimated project cost includes the reasonably foreseeable costs of contested easement acquisition, litigation, delay, access limitations, and route modifications;
- Whether existing transmission corridors, existing substations, or alternative configurations could reduce the need for new greenfield right-of-way across private property;
- Whether the proposed scope change remains constructible if the Culpeper Yeat terminal site remains formally opposed by the host county;
- Whether the proposed scope change remains constructible if the Joshua Falls starting point requires relocation to a new site, separate local land-use approval, a separate SCC application, additional 765 kV construction, and potential reconfiguration or deconstruction of existing facilities;
- Whether PJM has evaluated the dependency between the Yeat endpoint relocation and the Joshua Falls starting-point relocation, including whether either end of the project can proceed on the assumed schedule if the other is delayed, modified, challenged, or rejected;
- Whether PJM has evaluated the combined execution risk created by uncertainty at both endpoints, opposed route segments in Orange, Louisa, Culpeper, and Spotsylvania Counties, broader landowner and county opposition along the proposed corridor, Culpeper County's formal opposition to the proposed terminal site, and the potential need for separate approvals related to the relocated Joshua Falls substation.

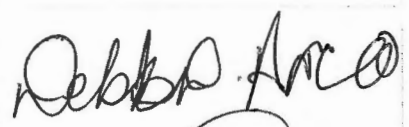
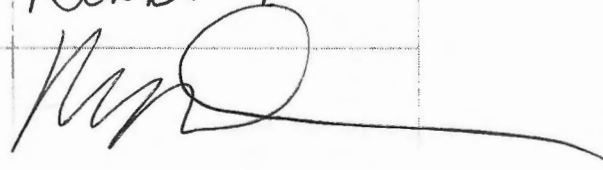
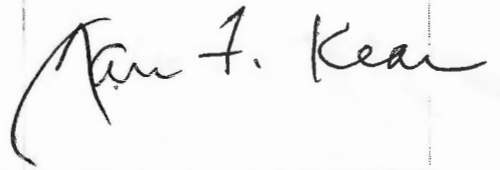
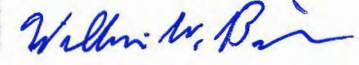
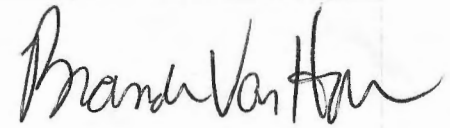
Recent additions to the potential routes in this project now impact additional landowners. We are confident that many of those newly impacted landowners will also sign on to preserve their property and pursue these issues through appellate review, including review by the Supreme Court of Virginia.

These are not theoretical concerns. They are known execution and feasibility risks before the Board acts. The landowners submitting this letter are placing PJM on notice that these unresolved right-of-way, litigation, routing, and terminal-site issues will become part of the record in any future Virginia SCC proceeding should the proposed scope change be approved and separate CPCN applications later filed for functionally dependent components of the same transmission path.

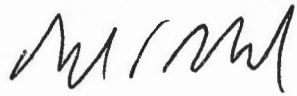
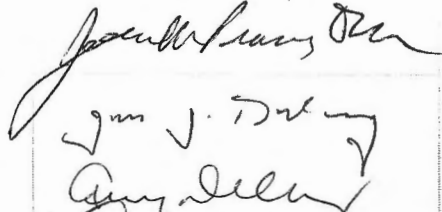
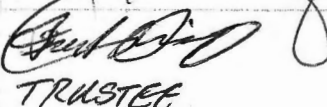
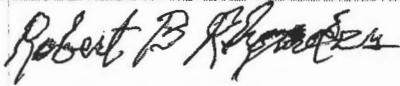
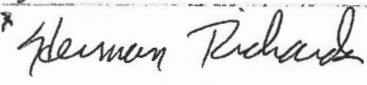
PJM should not approve the Joshua Falls–Yeat scope change unless and until the project sponsors demonstrate that the revised route and terminal configurations are feasible, constructible, and realistically capable of meeting the stated 2029 in-service date.

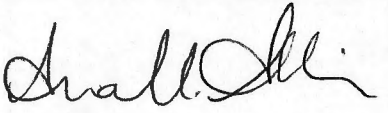
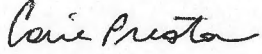
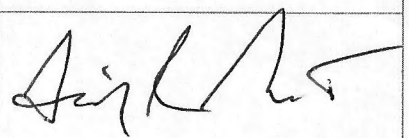
Landowner Signatures on Following Pages

Name	Tax Map	County	Route(s)	Signature
Robert M. Chambers Jr.	36-40, 36-41, 36-42	Orange	Y	<i>Robert M. Chambers Jr.</i>
Robert M. Chambers Jr.	71-91	Louisa	Y	<i>Robert M. Chambers Jr.</i>
Robert M. Chambers Jr.	67-38E	Culpeper	All	<i>Robert M. Chambers Jr.</i>
Gari N Dulin	22-48	Orange	Y	<i>Gari N. Dulin</i>
Gari N Dulin	67-38E	Culpeper	All	<i>Gari N. Dulin</i>
William A. Barnes	37-2	Orange	Y	<i>William Barnes</i>
Charles Woolfrey	35-39, 35-12E, 36-21	Orange	B,Y	<i>Charles Woolfrey</i>
REDACTED	REDACTED	REDACTED	REDACTED	<i>E. Eugene Ernst</i>
Eugene W. Ernst	21-22B	Orange	Y	
R andall Allen	63-57	Orange	B	<i>RD Allen</i>
Curtis Gish	21-42, 21-41 <i>21-45C</i>	Orange	R,B	<i>Curtis Gish</i>

Name	Tax Map	County	Route(s)	Signature
John W. Waugh	63-16	Orange	Y	
Anthony Mayo	50-24, 50-3, 50-4, 35-44	Orange	B	
Debbie Arco	62-21	Orange	R,P	
Vicky Denslow	62-19, 62-23K	Orange	R,B	
Shane Fletcher	11-17, 11-52, 11-56, 11-61	Orange	Y	
James Keon	13-94, 13-92, 13-100, 6-18, 7-1	Louisa	B,P	
Biscoe Family LLC	41-A-14, 41-A-13, 41-A-8	Spotsylvania	B,Y	
George William and Nancy Biscoe Trust	41-A-7	Spotsylvania	B,Y	
Biscoe Family LLC	64-3	Orange	B,Y	
Brandon & Caroline VanHoven	74-28, 74-28A, 62-23H	Orange	P	
Ed & Gwen VanHoven	73-5A, 73-6A, 73-6, 73-12	Orange	P	

Name	Tax Map	County	Route(s)	Signature
Ed & Gwen VanHoven continued	73-19 73-19A 73-18A	Orange	P	
Bill VanHoven	62-23E, 62-23D, 62-23C	Orange	P	
Jessie Sue Woolfolk, trustee	73-1 73-3 73-5	Orange	P	
Thomas Edward Graves	73-13, 74-1, 73-13, 74-2, 74-26	Orange	P	

Name	Tax Map	County	Route(s)	Signature
Paul A. McDonald	21-70	Orange	R,B,Y	
Robert & Joan Prasse	21-4	Orange	R,B,Y	
James & Amy Delaney	21-8-4	Orange	R,B,Y	
Lee & Shirley Bishop	21-44C, 21-44K	Orange	R,B,Y	 TRUSTEE
Robert B. Rhoades	21-43, 21-40A, 21-43A, 21-43B	Orange	R,B,Y,P	
John C. Kyonaga, Esq.	21-11A	Orange	Y	
Bertha May Mills & Rita Mills Gellatly	10-78A	Orange	R,B,Y	willing But unavailable
Jeanne L. Copperthite	10-78C	Orange	R,B,Y	
Herman L. Richards, Jr	3-5D	Orange	R,B,Y	
Zachary Dayton	3-5E	Orange	R,B,Y	
Michael N. Delaney	21-2-45	Orange	Y	

Name	Tax Map	County	Route(s)	Signature
Ben Ahlbin & Anna Ahlbin	21-2-46	Orange	Y	
Corie Preston	3-4	Orange	P,B,R	
Erin and John Frey	21-2-5	Orange	Y,P	willing but unavailable
Marc and Rebecca Henson	21-2-1	Orange	Y,P	
Corey Settle	21-2-44	Orange	Y	
Josh and Becky Graves	21-2-43	Orange	Y	
Sydney R. Pace II	27-A-38	Spotsylvania	Y,B	

Name	Tax Map	County	Route(s)	Signature
Benjamin Pennington	35-5-15	orange	O, Y	Benjamin L. Pennington
Robert Rhodes	21-43 21-43A 21-43B	orange	O, Y	Robert Rhodes
ANTILONY PETRALIA	49-20	ORANGE	RTE 619 O, Y	Antony Petralia
Jancy Althoff	34-24 34-27A	Orange	O, Y	Jancy Althoff
TERRELL MARONEY		Orange	N/A	Terrell Maroney
Paul Catron	35-5-38 35-5-17	orange	O, Y	Paul Catron
Darryl Chewing	49-47C	Orange	P, O	Darryl Chewing
Debbie Chewing	49-47C	Orange	P, O	Debbie Chewing
Susan Vertling	49-22A	Orange	orange + variant O, Y	Susan Vertling
Todd Mullins	62-4 62-5 62-7	Orange	P, O	Todd Mullins

Map 7. Proposal 820

NOTE: This map is only intended to illustrate the general electrical connectivity of the projects and should **not** be relied upon for exact geographical substation locations or line routes.

Project Overview

Proposal No. 820 includes five components, all of which are selected for the detailed evaluations.

- Component 1: Joshua Falls-Yeat 765 kV line
- Component 2: Yeat Station Greenfield Station
- Component 3: Yeat Station 500 kV Greenfield Cut-In Lines
- Component 4: Joshua Falls Substation Upgrade
- Component 5: Yeat Station 230 kV Greenfield Cut-In Lines

Constructability Review

Right-of-Way/Land Usage Risk Analysis

Joshua Falls-Yeat 765 kV Line

New Joshua Falls-Yeat 765 kV line is approximately 138 miles and will be constructed from the existing Joshua Falls station in Campbell County, Virginia, to the proposed Yeat substation in Fauquier County. The line will traverse 11 counties (Albemarle, Amherst, Buckingham, Campbell, Culpeper, Fauquier, Fluvanna, Louisa, Nelson, Orange and Spotsylvania) in Virginia.

The total route is 138 miles, with 66% (91 miles) either paralleling or using existing ROW, 18.5% (26 miles) paralleling AEP ROW, 14.3% (20 miles) in existing AEP ROW, 23.9% (33 miles) paralleling Dominion ROW, and 8.9% (12 miles) paralleling gas pipelines. Existing 69 kV (AEP) ROW from Amherst-Clifford will be utilized. This line is being removed and provides some existing ROW that will need to be expanded.

Yeat 500 Cut-In Lines Greenfield Transmission Line

The proposal includes approximately 1.5 miles for each leaving the proposed Yeat station to the existing Bristers-Ox 500 kV (1.03 miles) and Meadowbrook-Vint Hill 500 kV (0.5 mile) lines in Fauquier County, Virginia, which will parallel/cross existing ROWs to include interstates, roads, railroads, existing transmission lines/utilities, existing pipelines and best minimizes potential impacts to the natural and human environments.

Yeat 230 kV Cut-In Lines Greenfield Transmission Line

The component is a less than one-mile 230 kV new tie-in leaving the proposed Yeat station to the existing Vint Hill-Elk Run lines in Fauquier County, Virginia. The 230 kV greenfield tie-in routes will be paralleling/crossing existing ROWs to include interstates, roads, railroads, existing transmission lines/utilities, existing pipelines and best minimizes potential impacts to the natural and human environments. Overall, the ROW risk for this proposed component is medium. This component would cross approximately five railroads owned by Buckingham Branch Railway and CSX Transportation; approximately 118 roads/highways in Fauquier, Culpeper, Orange, Spotsylvania, Louisa, Fluvanna, Buckingham, Albemarle, Nelson and Amherst counties; approximately 12 transmission lines owned by Appalachian Power Co and an unknown owner; and approximately six pipelines owned by Colonial Pipeline and Transcontinental Gas Pipeline. It is anticipated that the proposal could require permits, consultations, clearances and authorizations from four counties in Virginia. State PSC Approval, CPCN and DOT utility permits, and driveway/local road permits may be required.

Yeat Substation

The proposed Yeat station will be 65 acres in size and located on undeveloped agricultural land in rural Fauquier County, Virginia. The proposed station will be purchased in fee.

Overall, the transmission line components parallel existing transmission lines and use some greenfield construction. This proposal's ROW risk is considered medium-high.

Environmental Risk Analysis

Joshua Falls-Yeat 765 kV line

The proposed component has the potential to impact environmental resources including FEMA floodplains, streams, and wetlands subject to USACE Section 404 and/or Section 10 permitting, and woodlands with the potential to serve as suitable habitat for federally listed Threatened & Endangered Species. Impacts to these resources will require coordination with the appropriate county floodplain administrator and coordination with state wildlife agencies, USACE and USFWS. Coordination with conservation easement holder – Team Green – will be required.

Transmission Line Risk Analysis

Given the extensive reuse of existing ROW for this proposal, transmission line construction risks are low and limited to concerns with existing overhead transmission infrastructure components needing to be removed/salvaged before construction of proposed brownfield lines can commence, and potential design limitations for reuse of existing infrastructure/assets.

Substation Risk Analysis

Yeat Substation

Yeat station will include two new 765/500 transformers in parallel, one new 500/230 kV transformer and one new 500 MVAR, 500 kV cap bank, one new 765 kV breaker, 10 new 500 kV breakers and three new 230 kV breakers.

Joshua Falls Upgrade

This component is to add two 765 kV breakers at Joshua Falls. Due to the mountainous terrain for Joshua Falls substation, any expansion of the substation to permit new line terminations will require significant civil work and costs.

Procurement of EHV equipment could lead to unexpected schedule delays due to extended lead times and additional cost. With EHV equipment being relatively uncommon in the U.S., unexpected delays in procurement, engineering and construction may occur. Additionally, regulation and currency fluctuations for overseas equipment are likely to occur, which will impact costs.

Constructability Summary

Proposal 820 has about 34% of its 138-mile run of 765 kV as greenfield construction, and the remainder mostly paralleling existing ROW. The anticipated challenges for land acquisition, combined with some of the environmental and local county features as a part of its proposed route, results in a medium-high risk assessment for constructability.

Outage Review

No significant outage risks were identified as a part of this proposal.

Cost Review

As part of the detailed constructability analysis, PJM and its consultants prepared a high-level conceptual, independent cost estimate for the components of this proposal. This estimate is based on a high-level assessment of probable costs for the current conceptual design and is reflective of recent supplier quotes and previous experience with substation engineering, transmission line engineering and construction. Additionally, where available, incumbent substation upgrade cost estimates were requested and incorporated into the independent cost estimate. The independent cost estimate includes a contingency of 30%, as it is a concept-level estimate. A side-by-side comparison of proposing entity costs and independent cost estimates is contained in **Table 11**.

Table 11. Proposal 820 Cost Review

Component ID	Component Description	Proposal Cost Estimates (\$M)	Independent Cost Estimates (\$M)
1	Joshua Falls-Yeat 765 kV line	675.00	781.26
2	Yeat Station Greenfield Station	226.90	347.76
3	Yeat 500 cut in-lines Greenfield Transmission Line	8.60	8.60
4	Joshua Falls Upgrade	99.19	99.19
5	Yeat 230 kV cut in-lines Greenfield Transmission Line	7.20	7.20
	Total	1,016.90	1,244.01

The total proposal cost estimate is within 11–20% of the independent cost estimate and is considered low-medium risk.

Schedule Review

Proposal 820 has a notable amount of 765 kV greenfield construction. There are environmental and local county issues expected as a part of its routing process. A medium-high schedule risk is assessed.

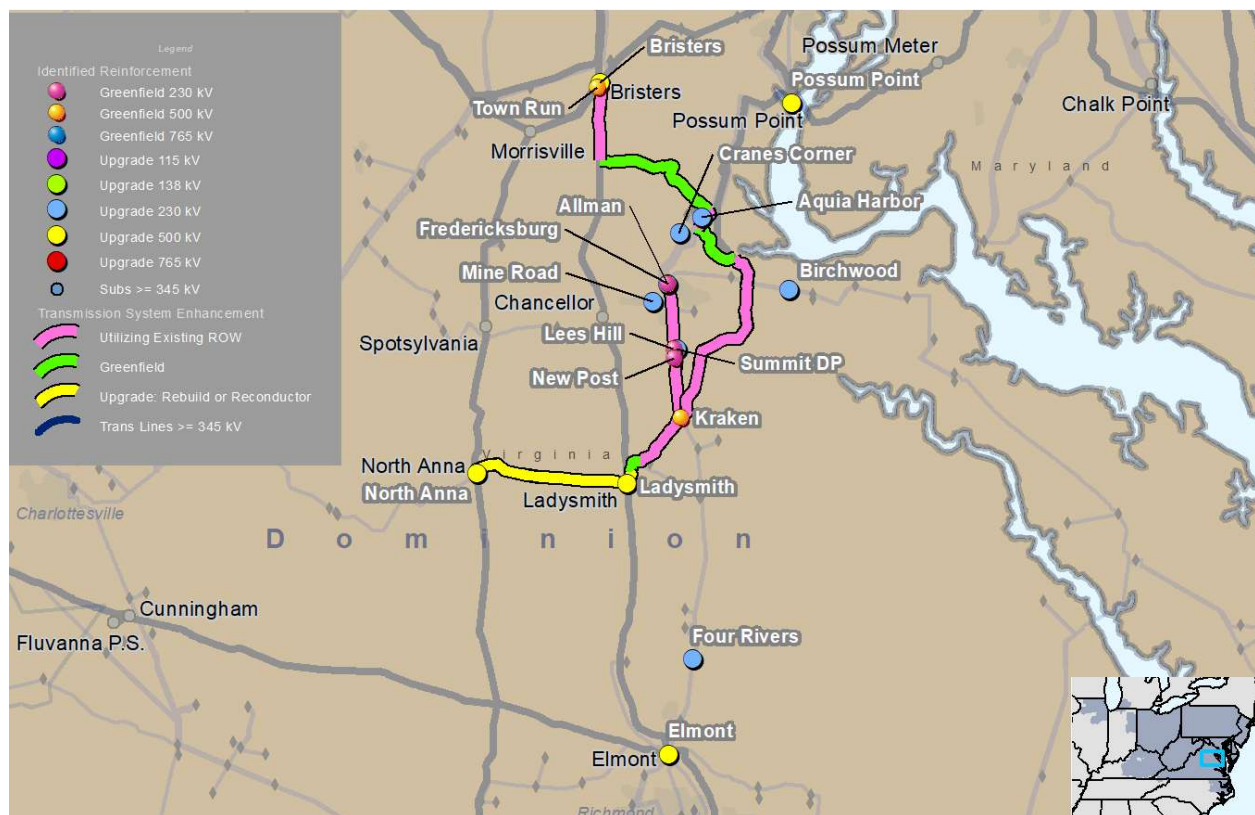
Proposing Entity Experience and Capability Review

Transource has significant experience with the proposed equipment and the capabilities to construct Proposal 820 as submitted. The proposing entity experience and capability risk is considered low.

Proposal 967 – VEPCO (Dominion)

Dominion Proposal No. 967 (**Map 8**), described as DVP Central Area Improvement, is one of the major components of the PJM joint Proposal Nos. 262, 759, 636 & 610 (Portfolios 1A, 1B, 2 & 3) to address the Regional Cluster solution. The Proposal No. 967 consists of a total of 38 components that include five greenfield transmission line components, nine transmission line upgrade components, three greenfield substation components and 21 substation upgrade components, adding up to 67 miles of 500 kV transmission lines.

Map 8. Proposal 967



NOTE: This map is only intended to illustrate the general electrical connectivity of the projects and should **not** be relied upon for exact geographical substation locations or line routes.

Project Overview

Dominion Proposal 967 includes the following components: