

My name is Tom Donahue. I am a retired electrical engineer and have been a resident in this County for more than 37 years. I believe that it is essential that this project be evaluated in the **broader context** of the **overall cost and harm** of the massive increase in electric infrastructure that is planned here in Loudoun County and the region as a whole.

- This particular line is just one of three segments making up what is really a 500 kV distribution loop needed to enable further growth of the data center industry.
- This 500 kV loop is part of a \$5 billion PJM project known as 2022 RTEP Window 3.
- The overall PJM project is also slated to bring three additional 500 kV lines into Loudoun from outside the County for what will be a total of six lines from outside that feed into this distribution loop.
- This project was formulated last year after the power industry and PJM were badly surprised by how fast the data centers were growing relative to an earlier 15-year forecast and by the large number of aging power plants seeking to be decommissioned.
- PJM already has concluded that this \$5 billion project is **insufficient** because the data center load continues to grow faster than the forecast of last year. Thus, PJM already has initiated a **new expansion project**, 2024 RTEP Window 1, for which we will begin to see new transmission line proposals in October.

The regulatory process breaks up the PJM plan by state, by company, and by segment; however, it is **one project**.

- With this **unprecedented scale** of building electric power infrastructure, particularly for a data center industry that serves a **global** customer base, we must give **greater weight** to the **harm** that is being caused by the **totality** of this massive **concentration** of industrial facilities in the midst of residential and other less intensive commercial interests.
- Data centers are even displacing existing residential neighborhoods in this County.
- We must look at proposed mitigations to the harms of this distribution loop **relative to** the \$5 billion cost of the **overall** PJM project and the **cumulative harm** of this and future infrastructure, not just relative to the cost of a single line.
- A simplistic cost comparison of one construction method to another is not sufficient.

Loudoun County in its submitted testimony has already described the economic harm of this particular line in terms of its impact on the County's "gateway" along what is essentially the main street of this County with its residential, education, retail, and historical sites.

- As the tallest structures in the County, the long line of towers will be a **dominating industrial feature** of our skyline throughout the lives of our children, our grandchildren, and beyond.

The growing data center industry in Loudoun is the largest concentration of **computing power** in the world, but other parts of the Commonwealth are following a similar path. Thus, this issue of how we **balance construction costs** for electric infrastructure **relative to community harm** is **not just a Loudoun issue**.

- Prince William, Stafford, Henrico, and Culpeper Counties are among those leaping in.
- Neighboring states such as Maryland, Pennsylvania, and Ohio are also moving in this direction.
- As this Commonwealth moves forward, our policies and our regulatory decisions need to consider the **full true cost** for the people who are being asked to live with this infrastructure.

There is a precedent from 16 years ago in Loudoun County with the 230 kV line that now is primarily aligned along the Leesburg Bypass. Dominion sought a southern path through private farmland, but the SCC examiner, in accordance with the law, rejected that path in favor of using the highway and the existing right of way along an unspoiled portion of the W&OD trail.

- Given that decision to use this portion of the trail, most people agreed that using underground technology was a better answer for the community than running the line above ground along the trail.
- But the SCC gave weight to construction cost and ruled that it should go **above ground**. The Virginia General Assembly thought otherwise. The Governor thought otherwise.
- Thus, that line segment was put **underground** as part of a “pilot” that has worked well for us.

Under the law, community harm deserves as much consideration as construction cost.

- Virginia law does not provide a mathematical formula. It is a matter of judgement.
- If we are not prepared to accept the **expense** of protecting our communities from **harm**, then perhaps we should **not** be building this electric infrastructure.
- If we do not see that harm as **reasonable** relative to the indirect economic **benefits** of hosting the data center industry on behalf of its **global** customer base, then we should not encourage further growth of this industry and further unmitigated harm to the community.

Thank you for your consideration.